



LEE VALLEY REGIONAL PARK AUTHORITY

**REGENERATION AND PLANNING
COMMITTEE**

21 SEPTEMBER 2017 AT 11:30AM

Agenda Item No:

6

Report No:

RP/01/17

CONSULTATION BY THE MAYOR OF LONDON ON THE DRAFT LONDON ENVIRONMENTAL STRATEGY

Presented by the Head of Planning and Strategic Partnerships

SUMMARY

The Mayor of London has published a draft Environmental Strategy for consultation which highlights the range of environmental challenges facing the city and sets out a suite of policies and proposals to address these. A strategic aim seeks to ensure that "London is **greener, cleaner and ready for the future**". The draft Strategy looks in depth at the following areas; air quality, green infrastructure, climate change mitigation and energy, waste, adapting to climate change and ambient noise. Officer's draft comments included at Appendix A to this report offer support for the Mayor's ambition to make London the world's greenest global city delivered through an integrated and holistic approach. More detailed comments are made in relation to the policies and proposals in the Green Infrastructure chapter and on climate change adaptation. As an interconnected river valley system, the Park performs many of the green infrastructure functions and services promoted by the draft Environmental Strategy and should be referenced in the strategy.

RECOMMENDATIONS

Members Approve: (1) the draft letter included at Appendix A to this report as the Authority's formal comments on the Mayor's draft London Environment Strategy

BACKGROUND

1 Mayor's Powers and Responsibilities

The Greater London Authority Act 1999 (as amended) allows the Mayor of London to create a London Environmental Strategy, setting out the Mayor's environment vision for London as required to meet London's

needs. The Mayor has a range of powers and responsibilities in relation to environmental matters. He has a legal duty to set out policies in this strategy for adapting to climate change and a duty to take action on climate change. The London Plan enables the Mayor to set a framework for the delivery of sustainable growth and guide spatial development. Through Transport for London the Mayor can manage London's transport and its impacts and supervise local authority air quality management functions. Local authorities will also be required to act in general conformity with the Environment Strategy on matters relating to municipal waste.

2 Recently the Mayor published a new vision for London: "A City for All Londoners". This document highlighted the fact that as the threats from climate change become more tangible, it is vital both for the health and wellbeing of Londoners and for business competitiveness to protect and enhance the environment.

3 **Current state of environment**

The draft Environmental Strategy presents a stark diagnostic of the environmental issues which, if left unchecked, threaten the future of the capital. In summary these are:

- Air quality – London's air is described as "dangerously – and illegally – poor" with high levels of pollutants present that harm human health and quality of life. It is seen as the most pressing environmental threat to the future health of London.
- Green Space and Biodiversity – there has been a gradual loss of green space due to development and the paving over of gardens. As green space is lost and/or reduced in quality, the range of plants and animals that live in London has decreased. Almost half of Londoners have poor access to parks and yet access to good quality green space and living in greener neighbourhoods can have a big impact on people's health and quality of life.
- Greenhouse gas emissions – there is an over-reliance on fossil fuels which means London is not yet on track to reduce its emissions quickly enough to avoid the worst impacts of climate change, or to meet national and international climate aims
- Energy – the strategy states that one in ten electricity substations are approaching full capacity, and demand will continue to increase as new areas of the city are redeveloped. One in ten households in the city live in fuel poverty.
- Waste – landfill capacity is set to run out by 2026 yet only half of the 7m tonnes of waste produced by Londoners each year is currently recycled.
- Flood risk – the expansion of impermeable surfaces, loss of green

space and an aging drainage system means London is increasingly at risk from flooding, particularly as climate change brings more intense rainfall and a rise in sea level.

- Heat risk – the strategy states that climate change is set to lead to heatwave conditions every summer by the middle of the century, and the Urban Heat Island effect makes the centre of London up to 10°C warmer than the rural areas around the city. Increasing heat risk could make homes, workplaces and public transport uncomfortable for all and dangerous for the most vulnerable.
- Water scarcity and river water quality – the Strategy states that by 2025, demand for water is expected to outstrip supply by ten per cent, and by 2040 the gap will increase to 21 per cent. A large proportion of London’s water is sourced from groundwater and surrounding rivers, which damages the health of rivers and threatens the city’s future water supply. London’s rivers are already in a poor state. Under an EU framework, only two of London’s 47 river water bodies are classed as ‘good’ – 31 are ‘moderate’, nine are ‘poor’ and the rest are ‘bad’.
- Ambient noise – excessive noise can damage people’s health. Almost 2.4 million people in London are already exposed to noise levels that exceed international guidelines.

THE DRAFT LONDON ENVIRONMENTAL STRATEGY

- 4 The draft Strategy sets out a suite of aims, objectives, policies and proposals to address these environmental challenges where action is required to deliver the Mayor’s vision for London “to be the world’s greenest global city”. A set of principles have been identified to ensure that the delivery of the Strategy remains realistic and ‘people-focused’.
 - Improving lives and reducing inequalities – action is required across different policy areas to provide solutions to environmental challenges and deliver on the social justice.
 - Leading by example – the Mayor and wider Greater London Authority (GLA) group should take the lead.
 - Avoiding negative impacts on other policy areas – a single focus on one policy concern shouldn’t lead to a negative impact on another.
 - London should be a global leader on the environment.
 - Moving beyond business as usual – rather than just minimising the worst impacts of future change, this strategy aims to protect and improve London’s environment.
- 5 Specific aims for topic areas are included:

Topic	Environmental Strategy Aim
Air Quality	London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities
Green Infrastructure	London will be a National Park City where more than half of its area is green; where the natural environment is protected and the network of green infrastructure is managed to benefit all Londoners
Climate Change Mitigation and Energy	London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy.
Waste	London will be a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of London's municipal waste will be recycled
Adapting to Climate Change	London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought.
Ambient Noise	Londoners' quality of life will be improved by reducing the number of people adversely affected by noise and promoting more quiet and tranquil spaces.

6 Four strategic approaches have been used in drawing together policies and proposals in the Strategy to make the most of environmental opportunities now and in the future and to reinforce the holistic approach that is considered essential to tackle London's environmental challenges. They are:

- Low carbon circular economy – to keep resources in use as long as possible in order to extract maximum value from them.
- Smart digital city – is about using new technologies and increased connectivity to make better use of infrastructure and provide more efficient services, for example smart energy meters can help people reduce their energy use.
- Green infrastructure and natural capital accounting – the huge range of benefits provided by green infrastructure – from better physical and mental health to reduced flood and heat risk – are too easily overlooked. Natural capital accounting addresses this by presenting the full benefits of green infrastructure in a similar way to other capital assets, such as buildings, to be clear about the implications of losing environmental resources.
- The Healthy Streets Approach – provides a framework for putting human health and experience at the heart of planning the city. Ten evidence-based indicators ensure individual streets are fair, inclusive and sustainable environments.

COMMENTS ON THE DRAFT LONDON ENVIRONMENT STRATEGY

- 7 The Regional Park has a unique role to play as part of the delivery of this strategy largely because of its size which creates a unique sense of place allowing lower ambient noise levels, lower temperatures countering the 'urban heat island' effect and the range of flood mitigation and control measures integral to its fabric. It is also a place for sustainable forms of transport including walking and cycling.
- 8 Officer draft comments set out in Appendix A to this report offer support for the Mayor's ambition to make London the world's greenest global city and the integrated approach to addressing the environmental challenges facing the city.
- 9 **Green Infrastructure**
The policies and proposals presented in the Green Infrastructure chapter are of most relevance to the Regional Park and the Park Authority notwithstanding the interconnectivity of environmental issues across a variety of themes. The Mayor's aim is for "London to be a National Park City where more than half of its area is green; where the natural environment is protected and the network of green infrastructure is managed to benefit all Londoners". Three objectives set out the specific outcomes that need to be achieved supported by policies and proposals:
 - Objective 5.1 Make more than half of London's area green by 2050.
 - Objective 5.2 Conserving and enhancing wildlife and natural habitats.
 - Objective 5.3 Value London's natural capital as an economic asset and support greater investment in green infrastructure.
- 10 Reference to the Regional Park needs to be included in the Strategy. The Park is an established part of London's Green Infrastructure recognised in the London Plan 2016 under Policy 2.18 'Green Infrastructure: The Multi Functional Network of Green and Open Spaces'. As an interconnected river valley system, the Park preforms many of the green infrastructure functions and services supported and promoted by the draft Environment Strategy. The Plan at Appendix B to this report shows the Regional Park within the London context.
- 11 There is general support for Objective 5.1 and the related policies and proposals which seek to "make more than half of London's area green by 2050". The Mayor's proposal (5.1.1c) to develop green infrastructure programmes and projects in major regeneration areas is particularly welcome given that the Park forms part of both the Lower Lee and Upper Lee Opportunity Areas.
- 12 Policy and proposals that aim to protect a core network of nature

conservation sites and seek a net gain in biodiversity (Policy 5.2.1) are also to be welcomed. Development pressure within and on the boundaries of the Park has the potential to fragment and isolate wildlife sites and create issues around access and disturbance. The Authority has supported the inclusion of policy in the riparian Local Plans which seeks to achieve a net gain in biodiversity as part of new development.

- 13 Proposal 5.2.1c, which seeks to secure better management of existing habitats, create new habitats and conserve key species, should be revised so that it also refers to non-native invasive species. These require landscape scale management to reduce their impact on the key species and habitats.
- 14 The Mayor intends to establish a London Green Spaces Commission to develop new models for the delivery and management of London's green infrastructure (proposal 5.3.1a) This should also consider the scope for additional mechanisms or funding to assist boroughs in co-ordinated nature conservation management. Very few local planning authorities have in-house ecological expertise to draw upon in planning for and making decisions relating to nature conservation. There is a need to refocus attentions at a landscape scale, to provide assistance to Boroughs and ensure a strategic approach to nature conservation. This could involve a range of other stakeholders including private organisations, Regional Parks, and charities.
- 15 A 'Natural Capital Account' for London's public parks and green spaces is to be published alongside the final version of the Environment Strategy. This approach is consistent with the newly emerging methodology of Natural Capital Accounting developed in this country by Government. This will set out the economic value of public parks and green spaces and thereby support, or provide a business case for, investment in these spaces. The Strategy reports "initial conclusions show London's public green space has a combined asset value in the order of tens of billions".
- 16 As part of the Park Development Process and the revision of its Strategic Policies the Authority is seeking to identify the range of benefits or services provided by the Park to its sub regional funding base. This is based on the premise that the Park provides essential 'ecosystem services' of financial and social importance to the sustainable development of London and the wider Essex and Hertfordshire region. This approach will be used to inform the strategic policies being developed as part of the Park Development Framework (PDF) to ensure the full 'value' of the Park is recognised and taken into account in future planning and land use decisions.
- 17 **Adapting to Climate Change**
The Authority's PDF Environment Proposals recognise the significant value of the flood risk management system and infrastructure within the Park and the benefit of this to the wider London area in terms of flood management. The comprehensive approach to climate change

adaptation and flood risk management under Objectives 8.1 and 8.2 is therefore supported. There is particular interest in the Mayor's proposals for nature-based approaches to flood risk and the use of green infrastructure to help manage flood risk. For the Authority this should provide opportunities to enhance the recreational, biodiversity and landscape values of the Park.

ENVIRONMENTAL IMPLICATIONS

18 The environmental implications are considered in the body of the report.

FINANCIAL IMPLICATIONS

19 There are no financial implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

20 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

21 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

22 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

23 There are no equality implications arising directly from the recommendations in this report.

Author: Claire Martin, 01992 709828, cmartin@leevalleypark.org.uk

BACKGROUND REPORTS

London Environmental Strategy Draft for public consultation

August 2017

APPENDICES ATTACHED

Appendix A	Letter to the Mayor of London
Appendix B	Plan showing Regional Park within the London context

LIST OF ABBREVIATIONS

PDF	Park Development Framework
GLA	Greater London Authority
MOL	Metropolitan Open Land
SSSI	Sites of Special Scientific Interest
SPA	Special Protection Area
GiGL	Green Space information for Greater London
SINCS	Sites of Importance for Nature Conservation
LVRPA	Lee Valley Regional Park Authority
AAP	Area Action Plan
CIL	Community Infrastructure Levy
LISI	London Invasive Species Initiative

Appendix A to Paper RP/01/17



Draft London Environmental Strategy
City Hall
The Queen's Walk
London
SE1 2AA

Email: swilkinson@leevalleypark.org.uk
Direct Dial: 01992 709885

21st September 2017

Dear Sir/Madam

RE: CONSULTATION BY THE MAYOR OF LONDON ON THE DRAFT LONDON ENVIRONMENTAL STRATEGY - LEE VALLEY REGIONAL PARK AUTHORITY COMMENTS

The Regional Park Authority welcomes the opportunity to comment on the draft London Environmental Strategy.

The Regional Park has a unique role to play as part of the delivery of this strategy largely because of its size which creates a unique sense of place allowing lower ambient noise levels, lower temperatures countering the 'urban heat island' effect and the range of flood mitigation and control measures integral to its fabric. It is also a place for sustainable forms of transport including walking and cycling. It should be explicitly identified as part of London's green infrastructure.

The Authority endorses the Mayor's ambition to make London the world's greenest global city and supports the integrated approach to addressing the environmental challenges facing the city. Given the extent of the Regional Park, 'London's' environmental issues cannot exist in isolation from the adjoining wider region of Hertfordshire and Essex and the delivery of potential solutions will have an effect on the wider Park, itself an interconnected entity and river corridor system.

Green Infrastructure

Specific reference to the Regional Park as an established part of London's Green Infrastructure should be included within the Strategy. The Lee Valley Regional Park is recognised in the London Plan 2016 as a strategic network of green infrastructure (Policy 2.18) and identified as part of London's strategic open space network (Map 2.8). As a Regional Park, and an interconnected river valley system the Park performs many of the green infrastructure functions and services supported and promoted by the draft Environment Strategy.

The Park Development Framework sets out the Authority's aspirations for the future development and management of the Regional Park (in accordance with the requirements of the Park Act 1966 section 14) as a multifunctional space contributing to the environmental sustainability of the region. Thematic Proposals adopted in 2011 identified the Regional Park's contribution to environmental sustainability and the role it can play in helping people improve their wellbeing. Environment themed objectives identified areas of focus for the Authority and its partners in relation to water quality and supply, flood risk management, energy efficiency, and sustainable waste management, alongside objectives for visitor facilities, sport and recreation, biodiversity, improving wellbeing and landscape. These thematic proposals have formed a framework for the adopted Area Proposals (Areas 1 through to Area 5) which cover the whole of the Park within the London area. These can be reviewed on the Authority's web site ([PDF Area Proposals link](#)) and work is underway on reviewing strategic policies which could account for this

The majority of open spaces within the Regional Park are protected as Green Belt and MOL and are open to the public for informal recreation and leisure purposes whilst also performing other environmental functions such as managing increased flood risk, conserving and enhancing scarce resources such as water and offsetting the urban heat island effect. Large areas of land and water are also protected as national and international areas of importance for biodiversity and as Sites of Importance for Nature Conservation (SINCs). These are managed by the Authority and partners to enable public access and interaction with nature, for example Walthamstow Marshes Nature Reserve and SSSI, Middlesex Filter Beds nature reserve in Hackney and Bow Creek Ecology Park in Newham. The soon to open Walthamstow Wetlands nature reserve in the Park in Waltham Forest, which will be managed by the London Wildlife Trust is the most recent example.

Objective 5.1 and the policies and proposals that flow from this which seek to "make more than half of London's area green by 2050" are supported. Proposal 5.1.1c which highlights the need for green infrastructure programmes and projects in major regeneration areas is important for the Park; it lies within both the Lower Lee and Upper Lee Valley Opportunity Areas. The London Plan has already identified the need within the Upper Lee Valley Opportunity Area for collaboration between the relevant boroughs, LVRPA and water utilities to relate new development to the environmental assets of the Regional Park and in doing so plan for long term flood risk management – outcomes the Authority is seeking to secure through major

projects such as Meridian Water and the Edmonton Leaside AAP within Enfield.

The Authority welcomes the protection of a core network of nature conservation sites and a net gain in biodiversity (Policy 5.2.1). Both are relevant to the Park given the number of protected sites (SINCs, SSSIs, SPA) and the future enjoyment of nature by visitors to and regular users of the Regional Park. Sites of nature conservation interest and importance are facing increasing pressure from development, its associated infrastructure and the lack of provision for wildlife within new schemes.

In its statutory role the Authority seeks to protect the integrity of the Regional Park. Development along the boundaries of the Park can fragment or disrupt wildlife sites and corridors within the Park, for example through lighting, noise, loss of buffer habitat. Achieving a net gain in biodiversity needs to be planned into new schemes from an early stage in the development process and adopted as a planning policy by the London boroughs.

Policy 5.2.1b identifies that further work will be carried out on a possible biodiversity offsetting metric for London. Given the scale of development proposed in the upper Lee valley this is something worth exploring, with the Regional Park benefitting from enhancement secured through CIL.

The Mayor's proposal 5.2.1c, to secure better management of existing habitats, create new habitats - to strengthen wildlife corridors and augment fragile habitats, and conserve key species is welcomed and endorsed. The proposal should also consider non-native invasive species and target landscape scale management of these as they will have an impact on the key species and habitats. The proposal could reference the LISI (London Invasive Species Initiative list) held at GiGL.

Table 1 under Proposal 5.2.1c identifies 4 habitat types chosen as suitable habitat creation and restoration opportunities for London. These tie in with the habitats identified in the Authority's revised Biodiversity Action Plan (due to be published later this year), namely Rivers and Streams, Reedbeds, Woodland and Grassland.

The principles of a 'National Park City' where everyone has the opportunity to experience, enjoy and benefit from the natural environment complement the Regional Park's remit and are fully endorsed by the Authority.

Proposal 5.3.1a aims to set up a (time-limited) London Green Spaces Commission to develop new models for the delivery and management of London's green infrastructure. There is also scope for additional funding to assist boroughs in co-ordinated nature conservation management. The report notes that the boroughs are stretched with regard to funding. Reforming of the London Biodiversity Partnership for example, potentially hosted at the London Wildlife Trust would refocus attentions at a landscape scale, provide assistance and expertise to Boroughs (who may now be lacking in-house

resources), and ensure a strategic and co-ordinated approach embracing not only boroughs but Regional Parks, charities and private organisations.

The Authority notes the Mayor's aim to publish and promote a natural capital accounting framework for London (Proposal 5.3.1b) and to publish a 'Natural Capital Account' for London's public parks and green spaces alongside the final version of the Environment Strategy. The Authority is currently exploring and seeking to identify the range of benefits or services provided by the Park, both for Londoners and the wider region of Essex and Hertfordshire as part of its work on the Park Development Framework. Understanding these benefits or 'ecosystem services' will help to ensure they are recognised in strategic policies, to be produced by the Authority. The key ecosystem services provided by the Park that have been identified and are currently under discussion include:

- Supports Biodiversity
- Connects people with nature
- Provides a sense of openness and tranquillity
- Keeps the air clean
- Increases physical activity through formal and informal activities
- Heat amelioration
- Creates opportunities to learn
- Boosts the local economy
- Protects London from flooding
- Appreciation of heritage
- Supplies water to London
- Provides food.

Adapting to Climate Change

The Authority supports the comprehensive approach to climate change adaptation and the policies and proposals which seek to understand and manage the risks and impacts of climate change in London (Objective 8.1 and policies/proposals under 8.1.1 and 8.1.2). The Authority recognises that climate change will increase the probability of flooding through a combination of intense rainfall and rising sea levels.

As a Regional Park based upon a river floodplain corridor the Park has a vital role in managing flood risk in the region; many of the water bodies, watercourses and open spaces within the Park provide capacity for floodwater storage. Whilst the flood risk management network is largely owned and operated by the Environment Agency many of the waterbodies and waterside open spaces are owned and managed by the Authority, especially in the north of the Park.

Proposals 8.2.1a and 1b are supported – the role of the Mayor in working with partners to raise awareness about flood risk and develop options and best practice in hard and soft-engineered flood management is welcomed. Within the Park, given its interconnectivity and presence in the upper sections of the

River Lee catchment there are opportunities to employ 'natural flood management' which, as described in Box 32 in the strategy, involves "managing flood risk by protecting, restoring and emulating the natural regulating function of catchments and rivers; often through a series of smaller interventions.." Within the Park these interventions and flood risk management in general would need to meet both the functional requirements and contribute to the recreational, biodiversity and landscape values of the Park.

The waterways and water bodies have an important role in supporting leisure activities in the Park; for this water quality and availability is critical, particularly in terms of the biodiversity value of the Park and its designated sites. Policy and Proposals under Objective 8.3 'Ensuring efficient, secure, resilient and affordable water supplies for Londoners' does not address this matter directly and it may be a topic for one of the other sections of the Environment Strategy. However the Authority is engaged in a couple of landscape-scale schemes which should be referenced; the Lea Catchment Nature Improvement Area and River Lea Catchment Partnership, which seek to address issues relating to the wider water environment, and the creation of resilient ecological networks.

Officers from the Authority would be happy to discuss any of the points raised in this letter in advance of publication of the final strategy.

Yours sincerely

Stephen Wilkinson
Head of Strategic Planning and Partnerships

