

Date: 05 December 2019  
Our ref: 298790



Brent London Borough Council  
**BY EMAIL ONLY**

Dear Sir/Madam,

### **Planning Consultation: Brent Local Plan Reg 19**

Thank you for your consultation on the above dated 23<sup>rd</sup> October 2019.

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.

#### **Biodiversity Net Gain**

We welcome the policy inclusion for achieving a net gain in biodiversity for all developments (Policy BGI1). Biodiversity net gain is strongly supported by the National Planning Policy Framework (NPPF) and features prominently in the government's 25 Year Environment Plan. When delivering this policy we recommend use of Natural England's recently released Defra Biodiversity Metric 2.0. The new metric is accompanied with detailed guidance and a tool to apply the metric. Natural England encourages the incorporation of the [10 best practice principles](#) developed by CIRIA/CIEEM/IEMA for those delivering biodiversity net gain.

#### **Green Infrastructure (GI)**

We welcome policy inclusion for retaining existing blue and green infrastructure and adding/enhancing where possible. GI provides multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. Please refer to Chapter 8 of the draft London Plan for further policy guidance when delivering the Local Plan.

#### **Brent Reservoir Site of Special Scientific Interest (SSSI)**

Brent Reservoir SSSI is of interest primarily for breeding wetland birds and in particular for significant numbers of nesting great crested grebe. The diversity of wintering waterfowl and the variety of plant species growing along the water margin are also of special note for Greater London.

We note that the Brent Reservoir SSSI is referred to under the name Welsh Harp. While we acknowledge this local name for the SSSI, we would recommend that the official name (Brent Reservoir SSSI) is listed clearly in order for local residents to know which name to search for when looking up information on the SSSI.

We note that the Local Plan identifies the Welsh Harp (Brent Reservoir) SSSI as a recreation and leisure opportunity. There are existing elements of recreation on the SSSI, such as sailing and walking round on official footpaths. However, recreational pressures for the Local Plan need to be considered if there are plans to open up more of the site for public use. Recreational disturbance of the site would be a planning consideration in particular when delivering the BEGA2: Staples Corner Growth Area which is adjacent to the SSSI.

We suggest the possibility of developing a supporting policy noting the need to protect the SSSI, including management of visitor recreational disturbance.

### **Climate Change**

We welcome the consideration of climate change within Policy BSUI1. We highlight the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. If creating a Green Infrastructure Strategy for the borough, there is opportunity to think of climate change within this strategy. Natural England will soon be publishing a 2<sup>nd</sup> edition of its Climate Change Adaptation Manual which will include a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough.

Yours sincerely,

Thames Solent Team, Natural England