

I am a resident of Edmonton. My comments on the Draft Local Plan are as follows:

DRAFT STRATEGIC POLICY SP BG5: "*Green belt and edges of the countryside/urban area*"

- This borough contains some of the largest brownfield sites in London, yet huge swathes of Green Belt land are earmarked for residential development in this draft policy. This is a developer-led policy that in no way reflects the interests of the people who live in the borough, nor the residents of these future new developments, who will no longer benefit from the so-called 'permanent' Green Belt.
- Anyone who is paying any attention to the serious cliff-edge loss of biodiversity in this country will recognise that this is a seriously backwards and short-sighted proposal. Our existing developed areas cannot support biodiversity the way wild areas can and we are rapidly losing biodiversity through ignorance and lack of interest in the natural world. Last year, bored lockdown gardeners destroyed habitats for invertebrates and now hedgehogs are starving. Every old roof that is replaced blocks nesting spaces. More gardens are paved over for convenience. New LED streetlights are depleting caterpillar survival rates by 50%. Within this bleak context, to propose the permanent loss of huge areas of habitat in our precious Green Belt is devastating. All the sustainable building materials and SUDS schemes and a bit of tree planting cannot replace destroyed habitat, and most borough residents will not voluntarily create wildlife-friendly gardens as the existing evidence shows.
- The Green Belt is important because creatures need large enough connected areas to meet their minimum needs for food, nesting, shelter and supporting a large enough population so that they survive. This underscores why these areas need to be left alone and not destroyed for imaginary 'benefits' that can be obtained elsewhere. Meadows are particularly critical for biodiversity as they support the invertebrates that support birds, bats and mice, that support foxes and birds of prey etc.
- In no way does the building of houses on these 'previously-developed' areas in the Green Belt represent 'very special circumstances' in accordance with the NPPF. The borough, particularly Edmonton, has sprawling single storey shopping areas and semi industrial areas that could support huge numbers of dwellings in mixed use developments. There is absolutely no credible evidence that the only way to provide new houses is by building on the Green Belt, and lots of evidence that there are brownfield opportunity sites that have not been used up yet.
- Green Belt development would be car-reliant and unsustainable in every sense of the word. The only people who are in favour of it are developers and those who will financially benefit.

DRAFT STRATEGIC POLICY SP BG3 "*Biodiversity net gain, rewilding and offsetting*".

- I monitor the bird visitors to my garden and am concerned about the decline of urban bird species in the borough such as swifts and sparrows. There appears to be nothing in the Local Plan to help them. Many Councils require nest boxes such as

swift bricks in new developments, but I can see nothing specific that would ensure this is a requirement or that these species would be supported. Swifts especially have very specific needs and modern building construction excludes any space for nesting (i.e. parapet roofs do not allow for nesting).

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- Normally, I can see bats hunting over the garden on summer nights, but I have not seen any this year, which is a great concern. Please require developers to provide bat boxes in new developments.
- The DEFRA biodiversity net gain metric does not take into account the urban species that use buildings, and no value is given for providing nesting and roosting spaces nor travelling routes for these species.
- Hedgehogs are struggling as their territories/food sources are cut off and reduced in size by fences and roads and lack of natural areas. The situation for Hedgehogs is particularly dire in London, where they are extremely rare. Please include a requirement for developers to provide hedgehog highways in new developments.
- The London Plan 2021 Policy G6 Biodiversity and Access to Nature (page 325) calls for artificial nest sites that are of particular relevance and benefit in an urban context.
- The NPPG 2019 Natural Environment Paragraph 023 mentions that relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs.
- Integrated measures for wildlife are particularly important for their long lifetime without maintenance being required.
- Water is one important, and often overlooked requirement for the survival of all wildlife, and rarely provided in urban areas. Wildlife ponds should be included in new developments.

I have installed 14 swift boxes, and two nest boxes, and allow my grass to go long and it is awash with grasshoppers, every variety of bee, and butterflies. My wildlife friendly garden (although it has a long way to go) is a rarity in the area. I have seen just one hedgehog, but can see that there is little habitat/food source for them in gardens here. It is absolutely essential that we stop invading and destroying the last places where wildlife has a shred of protection, and so that it (and they) will still be there for us to enjoy. Daily, people prove that they can't cohabit peacefully with wildlife and are happy to drive it out of their gardens. NOT building over the Green Belt is the least we can do.