

Christopher Coombe

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19:06

Dear Carmel

I am so sorry this has slipped between the cracks, and it seems we are late to make any comment. We would quite understand if the Inspectors decide to ignore this, but have just one point to make on the proposed amendments.

The Proposal at paragraphs 6 and 9 is to change “all” to “major” in the description of developments, change “alleviate” to “address” and then add a qualification “where suitable and viable”. The London Plan is cited as the reason for the use of “address”. The justification for the use of “major” is that only larger sites could achieve this, but “major” is not defined

The change from “alleviate to “address” in both 15.3 (f) and 15.3.23 conforms with the London Plan. But the use of the word “major” in place of “all” does not. Major is not defined, and is likely to confuse. The problem that the modification might address should, we submit, not be the *size of the site*, but what is *proportionate to the site* and its circumstances. The Plan would be clearer if it acknowledged that there may be a proportionate solution. The further qualification of “major” by “where suitable and viable” is an unnecessary further dilution. As the explanation is that only major sites (undefined) are likely to be able to deal with such problems, that qualification weakens the policy further and is not required. Suitability and viability are better and fairer measures by which to assess all cases.

It would be far simpler to avoid issues about the size of the site, and apply the London Plan test to all sites. The change from “alleviate” (which suggests “remedy” or “improve”) to “address” (which suggests “consider” or “engage with”) is already weaker and should itself be more than enough to deal with issues of viability on any site, but if “major” is changed to “all” a viability test would be reasonable. We suggest that the amendments read as follows:

*f. Expect ~~Major~~ all development on sites found in an area of deficiency in access to nature to address the deficiency, where suitable and viable. ~~incorporate appropriate Biodiversity elements and habitat features to improve nature conservation, and to improve accessibility to SINC~~s through site design.*

*15.3.23. ~~Major~~ All development proposals on sites that are located in these areas of deficiency will be expected to ~~alleviate~~ address these deficiencies, where suitable and viable. We will support improvements in accessibility to SINC*s in areas of deficiency through all developments, where this is practicable ~~possible and practical~~.

Kind regards  
Christopher Coombe