

Dec 2nd 2021

To the City of London Planning and Environment Committee,

The London Environmental Network supports the City of London adopting the updated Environmental Management Guidelines. We recognize the importance of the Guidelines for protecting the Natural Heritage System and conserving wildlife habitat, Species at Risk, water resources and ecological functions within the City of London and as part of systems which extend throughout the surrounding region.

**The updated Guidelines are essential to ensuring that environmental studies and monitoring of, as well as protective measures for, the Natural Heritage System will be carried out according to best management practices informed by current science.**

Given ongoing climate change and biodiversity loss crises, safeguarding the Natural Heritage System is more important than ever. Development in London is proceeding at an accelerated pace. Studies, reviews and plans for mitigation to support development proposals must reflect the City's responsibility to conserve the Natural Heritage System for future generations.

On their face, the 2021 draft Environmental Management Guidelines include numerous improvements over their 2007 predecessor. However, it may be the case that the forthcoming implementation of the updated Guidelines will reveal conflicts, gaps and sources of ambiguity in the text that reduce the overall effectiveness of the Guidelines for protecting the Natural Heritage System.

**Therefore, we urge Council to adopt the new Guideline with a requirement for staff to report back to the Planning and Environment Committee at least twice during a Council term, starting with June of 2023, on the application of the new Guidelines and recommendations for any changes that may be required.**

We also thank the tireless voluntary work of EEPAC committee members for supporting the review of these guidelines from the community's perspective.

Thanks for your time,



Skylar Franke  
Executive Director  
London Environmental Network