
From:
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Dear Mayor Khan and the London Plan team,

With reference to the London Plan consultation I wish to respond as follows.

Trees are vital to our nation's health and happiness and especially in our crowded cities where they help to absorb pollution, provide cover and habitat for wildlife and make the 'concrete jungle' a pleasanter place to look at and to live in. Consequently I am asking that the following points be considered or incorporated in the London Plan. My main point is that trees should be specifically mentioned and not just linked together with green spaces, which can mean just grass or verges. In paragraph 1.3.3 "and trees" should be added after the word waterways. In paragraph 3.9.5 "Protection of Trees" should be an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings. In policy H1 sentence B2)d public sector owned sites should not include woodland, parks or open spaces. Paragraph 4.2.9 any loss of green cover as a result of housing developments must be compensated for by off-site provision of trees or green space. This might include green roofs, landscaping to ensure adequate urban drainage or street trees. Policy S4 - section B2)d which sets out proposals for play areas for children and youngsters which should be at least 10 square metres per child and incorporate trees and green space. Policy G1 should be supported since it emphasises the importance of trees. This support also applies to Policy G5 and also the inclusion of woodland and trees in Table 8.2. Reference should also be made to "Residential Development and Trees/Woodland Trust, 2015. Sites of Metropolitan Importance and all ancient woodlands should be added to the categories of planning applications that MUST be referred to the Mayor. Section B)1 should be amended to read "GIVE STRONGEST POSSIBLE PROTECTION TO VETERAN TREES AND ANCIENT WOODLAND ESPECIALLY WHERE THEY ARE NOT ALREADY PART OF A PROTECTED SITE". We must support the role specified in paragraphs 8.71-8.73. We must have MORE trees in cities not LESS.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: "Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city."
- Paragraph 3.9.5. I support the inclusion of "Protection for trees" as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that "public sector owned sites" will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of "no net loss of overall green cover" as a result of small housing developments, and support "off-site provision such as new street trees" in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES."
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: "incorporates trees and/or other forms of greenery".
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and

subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).

- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and

all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.

- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): "GIVE THE STRONGEST POSSIBLE protection TO 'veteran' trees and ancient woodland, ESPECIALLY where these are not already part of a protected site". I support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners' manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresses.

Yours,

Joan Anne Hepworth

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