Woodland Trust, March 2018

Response to the consultation on the New London Plan

About the Trust

The Woodland Trust is the UK's leading woodland conservation charity and aims to protect native woods, trees and their wildlife for the future. We do this by protecting, restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woodland. We champion and deliver the most dynamic solutions to protect and revitalise our natural environment – the recreation of wooded landscapes on a national scale. We own over 1,000 sites across UK, including 5 in London, and nationally we have 500,000 members and supporters.

We campaign to ensure that laws governing environmental protection are enforced and that central, regional and local government is held to account on environmental pledges. We also campaign vigorously with the support of local communities, to prevent any further destruction of ancient woods and veteran trees.

What does the Trust want to see for London?

We intrinsically know that trees give colour, beauty and life to London. There is now a wealth of evidence on the many benefits of accessible woodland and high canopy cover, including improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity.

Most of these issues are summarised, along with the appropriate references for the background research and evidence, in the Trust's publication *Residential Development and Trees*

Before the last Mayoral election, we presented a manifesto for woods and trees to all candidates. We want the London Plan to lead to:

1.   Better protection for London's trees and woods from development, especially ancient woodland and veteran trees.
2.   More tree canopy cover provided, especially through new development.
3.   More Londoners able to access and appreciate the wide benefits trees bring to their lives.
4.   More political recognition of the value of urban trees to people and wildlife through London's example.

The following suggestions are what the Trust has identified as London Plan policies to support and also recommendations for improvement, relating to the topic of trees and woodland and related issues of green infrastructure and net gain for biodiversity. They are written here as they appear in the London Plan, not in priority order. Any proposed additions are set out in **bold text in red**, proposed deletions ~~struck through~~.

Detailed comments and suggestions

Policy GG2: Making the best use of land

Support this policy, but **recommend** the following addition to paragraph D "Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening **in order to secure net gain for biodiversity**"

Recommend the following addition to the second sentence of paragraph 1.2.6 "Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering 50 per cent green cover **and net biodiversity gain** across London, will be important to help London become a National Park City."

The Government's 25 Year Plan for the Environment makes frequent reference to environmental net gain, and the draft London Environment Strategy aims to increase green and blue cover to over 50%. Therefore, appropriate references to net gain for biodiversity should be included here and elsewhere in the plan.

Paragraph 1.3.3

Recommend an addition to the following sentence: "Access to green and open spaces, including waterways **and trees**, can improve health, but access varies widely across the city."

Our own research on the Woodland Access Standard (adopted by the Forestry Commission) indicates that access does indeed vary across the city. The latest data was published in *Space for People* last year, but the Trust can supply the data in GIS form if required.

The health benefits of greater tree canopy are summarised in *Residential Developments and Trees*, but new evidence continues to emerge that widens our appreciation of such benefits, such as the "'Urban Mind" project (http://proarbmagazine.com/new-research-conducted-kings-college-london-suggests-trees-sky-birdsong-cities-beneficial-mental-wellbeing/).

Policy GG5 Growing a good economy

Recommend an additional Part H is added to Policy GG5: "**H: Ensure that London's economy contributes to the protection and sustainable management of the natural environment, and secures net gains in its quality and quantity.**"

Policy GG5 and supporting paras implies that growth can be achieved in isolation from the natural environment, and without environmental damage. Nevertheless, we consider that London's natural environment makes a significant contribution to the capital's economy, and its attractiveness to business. This is recognised in the Mayor's draft Environment, and Economic Development Strategies, and the Mayor's aim to introduce a Natural Capital approach.

Policy GG6 Increasing efficiency and resilience

Recommend adding a sentence to Part B: "Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like

flooding and heatwaves, and avoiding contributing to the urban heat island effect. **Ensure green infrastructure is protected and created to enhance resilience against a changing climate.**"

This policy and subsequent narrative do not mention the role of green infrastructure and natural water systems in helping make the city more resilient to impacts from climate change and other severe natural events.

Paragraph 3.9.5
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.

Paragraph 4.2.9
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.

Given the previously mentioned commitments to net gain, this means that no net loss in small housing developments is essential if these targets are to be achieved elsewhere.

Policy H10 Redevelopment of existing housing and estate regeneration
Recommend a minor amendment to the third bullet point in para 4.10.2: improving the social, economic**,** ~~and~~ physical **and natural** environment in which homes are located

We are concerned that the intensification of existing housing estates can lead to net losses of trees, open green space and wildlife, often in areas of already poor green infrastructure provision. The management of these open spaces has often led to them being of poor quality (and use) and negative perceptions, and hence vulnerable to loss.

Policy S4 Play and informal recreation
Support section B2d, 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".

There is an increasing amount of research showing that children benefit physically and mentally from playing outside in more natural green spaces (see *Residential Development and Trees*).

Policy G1 Green infrastructure
Support this policy, and subsequent narrative that mentions the important role of trees

Policy G5 Urban greening
Support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees.

Recommend that the policy, or narrative, clarifies that the requirement to protect what is already there takes precedence. The good practice of the "Mitigation Hierarchy" aims to avoid loss or harm as the first step.

Support the inclusion of the role and weighting for woodland and trees in *Table 8.2 - Urban Greening Factors*

Recommend a higher weighting for hedgerows in Table 8.2, as they will be located in publicly accessible locations where they will give more public benefit than some of the other elements listed.

Recommend including a reference to *Residential Development and Trees* (Woodland Trust, 2015, www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/)

This document references the research that supports the importance of trees and green spaces in housing developments. Over 80 per cent of the population now live in towns and the benefits of providing high quality green spaces is widely recognised. These vital spaces can be taken for granted but add significant value to developments in terms of social, economic and environmental benefits. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the benefits they can provide.

Policy G6 Biodiversity and access to nature
Support this policy.

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.

Recommend that an intention to achieve Net Gain for Biodiversity is included in Policy G6.

Both these additions would reinforce the Mayor's intention to protect and increase green cover (and realise the benefits that cover provides), and echo the government's commitment to net environmental gain.

Policy G7 Trees and woodlands
Support this policy, but **recommend** that *Section B)1* is strengthened as follows: "**give the strongest possible** protect**ion to** 'veteran' trees and ancient woodland**, especially** where these are not already part of a protected site".

Ancient woodland is irreplaceable, yet still under threat - the Woodland Trust knows of over 500 such locations under threat of development in England alone. Veteran trees are similarly threatened, especially those outside of sites with some extent of protection. Given the GLA's new *Strategic Housing Market Assessment* showing that London has a need for approximately 66,000 additional homes a year, both these habitats are likely to become threatened in London in the future.

Loss of irreplaceable habitats will <u>always</u> entail net loss to biodiversity.

Recommend referring London boroughs to guidance on ancient woodland and veteran trees: *Planners' manual for ancient woodland and veteran trees* (Woodland Trust, 2017, www.woodlandtrust.org.uk/publications/2017/09/planning-for-ancient-woodland/).

This manual covers a comprehensive range of issues relating to ancient woodland, veteran trees and planning. It is still possible to undertake high quality development that respects and responds to the precarious nature of our ancient woods and trees. This document helps planners embed ancient woodland and aged and veteran trees into plan making and decision taking.

Support the subsequent narrative on the role of trees, particularly paragraphs 8.71 – 8.73, but **recommend** that two elements are put back in to the policy section, as they were in the last London Plan: i) The requirement for boroughs to produce and regularly update tree strategies (if necessary as part of boroughs' wider green infrastructure strategies), using the GLA and FC Supplementary Planning Guidance on preparing tree strategies; and ii) The reference to guidance produced by the Trees and Design Action Group.

Contact details, for further information or clarification:

Richard Barnes MCIEEM, CBiol, MRSB
Senior Conservation Adviser; External Affairs Officer - London

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
0330 333 3300
www.woodlandtrust.org.uk

Stand up for trees