The Draft London Plan December 2017

Trees and Design Group Response to Consultation

Introduction

The Trees and Design Action Group (TDAG) is an open collaborative forum facilitating cross-sector and cross-disciplinary dialogue and projects promoting the role of the urban forest throughout the United Kingdom.

The group shares the collective vision that the location of trees, and all the benefits they bring, can be secured for future generations through better collaboration in the planning, design, construction and management of our urban infrastructure and spaces.

Established in 2007 as a not-for-profit and apolitical collaborative forum, TDAG incorporated as a charitable trust in 2013. Its membership, online publications and information are free. This approach enables TDAG to assimilate ideas and knowledge independently of organisational hierarchy, profit or commercial interests.

The Trees and Design Action Group (TDAG) welcomes much of the content of the Draft London Plan and would make the following comments. Proposed amendments to the text are in bold with additions in italics.

Chapter 1 Planning London's Future (Good Growth Policies)

Policy GG1 Building Strong and inclusive communities

We would stress the role that trees and accessible green space can play towards these broad objectives; they are currently absent from the policy wording and we would recommend their mention, for example as part of objective GG1-C, to ensure they are part of planning decisions and local planning policy.

Policy GG2 Making the best use of land

We recommend that infrastructure assets (GG2/F) include green infrastructure assets especially trees which deliver multiple cross-cutting social, environmental and economic benefits.

Paragraph 1.3.3. **Access to green and open spaces, including waterways *and trees* can improve health, but access varies widely across the city.**

Policy GG3 Creating a healthy city

We support this policy and would recommend that trees are identified with active travel, healthy streets and provision of new green infrastructure.

Policy GG6 Increasing efficiency and resilience

A significant area of developed urban land is associated with transportation, access, parking, storage and open space. This can be designed and managed to deliver multi-functional ecosystem services as green infrastructure and this is most effectively addressed at an early stage of the development process. We there recommend that explicit attention is drawn to this opportunity through the following policy amendment.

B. Ensure buildings, *spaces* and infrastructure, *including movement corridor*s, 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 *and making effective use of natural assets such as trees to help mitigate and adapt to the effects of climate change.*

Chapter 3 - Design

Policy D2 Delivering good design

Trees provide a wide range of benefits in densely developed urban environments and are subject to special consideration in the planning system. They are also often perceived to be in conflict with development due to characteristics such as root activity (notably on London's shrinkable clay soils), light or visibility obstruction, falling debris and safety, all of which may be addressed through well-considered and sensitive design. We therefore *strongly* recommend that the policy should make explicit reference to the need to accommodate existing and new trees and that the design and layout of buildings and infrastructure make appropriate allowance for them.

Initial evaluation

A 6) open space networks, green infrastructure *including existing trees*, and water bodies

Design Quality and development certainty

D Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and placemaking based on the characteristic set out in Policy D1 London's form and characteristics. *Special care should be taken to ensure that landscape design proposals, including the retention of existing and establishment of new trees, are accommodated in and potential long term conflict between retained or new trees, hedgerows and built form are designed out at the planning stage.*

Policy D9 Basement development

Para 3.9.5 TDAG strongly supports the reference to protection of trees, landscape and biodiversity as these can be at great risk from excavations at basement levels.

Chapter 4 – Housing

Policy H1 Increasing housing supply

Sentence 2) (d) the redevelopment of surplus utilities and public sector owned sites *provided they do not include woodland, parks and open spaces.*

Chapter 5 – Social Infrastructure

Policy S4 Play and informal recreation

The policy addresses play provision in predominantly conventional terms as a facility that is primarily for children and young people and as a component that needs to be added to the built environment, rather than fully integrated as a part of good place-making. We support the policy reference to incorporating trees and greenery into play spaces, not least because of the shade, shelter and biodiversity value they add, but would like to see a more positive approach to enabling play and recreation opportunities for all members of the community to be incorporated into well-treed streets and open spaces generally. In the Vauban suburb of Freiburg, there is a policy approach that children should be able to play everywhere. This has beneficially influenced the design and layout of streets, buildings and open spaces and encourages greater community cohesion, rather than segregating play and recreation from other urban activity and regarding it as solely the preserve of children and young people.

We therefore suggest the following amendments to the policy text:

B. Development proposals should, wherever feasible:

2) d) incorporate existing and new trees and other natural elements.

4) for public realm developments, new streets and open spaces, incorporate incidental play and recreation opportunities and natural elements, including trees, to make the space more playable, comfortable, attractive and distinctive.

Policy S7 Burial space

Burial spaces are significant elements of open space and green infrastructure within the urban environment and reference is made to this in the supporting text. We would like to see explicit reference made in the Policy to the importance of good landscape design and management for new and existing burial spaces and for opportunities to be taken where possible to plant large-growing, long-lived trees in such spaces. Suggested policy addition:

D. New burial spaces should be designed, laid out and managed to make a positive contribution to green infrastructure including the planting of large-growing and long-lived trees where possible.

Chapter 8 – Green Infrastructure and Natural Environment

Policy G1 Green Infrastructure

Paragraph 8.1.1 **... network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; *supporting learning and development in children and adults*, adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.**

Policy G5 Urban greening

We welcome the specific inclusion of trees in the policy section A, as new development offers vital opportunities to maintain and increase the urban forest population and its contribution to resilience, health, wellbeing and good place-making. We also welcome the reference to TDAG's publication Trees in Hard Landscapes in Table 8.2

Policy G7 Trees and woodlands

Trees have a finite life and the Mayor's intention to increase tree cover by 10% by 2050 make it essential that new development should provide for new tree planting wherever possible. TDAG would welcome the additional weight that would be given to inclusion of its guidance on urban trees within the policy, rather than simply in the supporting text at 8.7.2. We therefore propose an amendment to C as below:

C. **Development proposals should ensure that*, wherever possible,* existing trees of quality are retained (FN 108). If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should *wherever possible* be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy. *When**

preparing more detailed planning guidance boroughs should refer to ~~the Forestry Commission's Right Trees for a Changing Climate (FN 110) and~~ guidance produced by the Trees and Design Action Group (FN 111), a multi-disciplinary cross-partnership forum seeking to promote urban forests, including the forthcoming online guide: Species Selection for Green Infrastructure.

TDAG would similarly wish to see the Policy include an explicit requirement (as in the previous 2011 London Plan Policy 7.2.1) for Boroughs to produce tree strategies as part of their Green Infrastructure strategies (referred to in Policy G1), rather than this being simply included in the supporting text at 8.7.1. We therefore propose an addition policy requirement as below:

D. Boroughs should produce a Tree Strategy covering the audit, protection, planting and management of trees and woodland in accordance with the Mayor's SPG Preparing Borough Tree and Woodland Strategies (Feb 2013) and incorporate this within their Green Infrastructure Strategies.

Paragraph 8.7.2 Increase in canopy cover. It is important that canopy cover across Greater London is more consistent to ensure increases in canopy cover in areas of deprivation. Ref. Canopy Cover Report from the Urban FWAC (due for launch 20 March 2018) which recommends 20% canopy cover overall (not average).

Chapter 9 - Sustainable infrastructure

The use of trees, together with other natural elements such as green walls, green space and water features, can help to mitigate heat risk through evapo-transpiration and shading. Trees and vegetation can also reduce wind chill and turbulence. There is also substantial evidence that informed use of trees and shrubs or hedges make a positive contribution to air quality. The US Dept. of Energy provides guidance on the effective use of landscape to reduce energy requirements and create more comfortable environments.

We would wish to see reference made in policies in Section 9 to ways in which landscape treatment of external spaces and structures and the microclimatic effects of green infrastructure, particularly large growing trees, can reduce energy demands for heating and cooling and create a more amenable environment for people and wildlife.

Policy S11 Improving air quality

Air quality and green infrastructure – reference *First Steps in Urban Air Quality* – new guidance from the Trees and Design Action Group (TDAG) UK by Ferranti, E.J.S., MacKenzie, A.R., Ashworth K., and Hewitt C.N. 2017is now available as a free download from: http://epapers.bham.ac.uk/3069/

Policy SI4 Managing heat risk

We suggest the following additional section.

C. Development proposals should, wherever feasible, make use of landscape design and natural assets including trees and other green infrastructure elements to help in reducing energy demands of buildings and uncomfortable or unhealthy overheating of external areas.

11. Funding the London Plan

Green Infrastructure

11.1.45 onwards

TDAG strongly supports the comments made in the section on funding Green Infrastructure. We would stress the importance of ensuring that all opportunities associated with new development, transportation projects, 'grey' infrastructure improvements and other major change activities are fully exploited to create, integrate and connect green infrastructure assets, including new urban tree and woodland planting.

Representatives of TDAG would be pleased to discuss these matters further or to provide any additional information.