
From:
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Subject:

Dear Mayor Khan and the London Plan team,

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

I believe we need to amend development processes so that a more balanced decision can be reached which reflects the value - in its wider sense - of trees to London. They are not just lumps of rooted wood to be got rid of if they're in the way, and their value needs to be recognised more fully.

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,

Ken Williams

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