

Matter 66: Biodiversity, trees, food growing and geodiversity

M66. Would Policies G6-G9 assist in creating a healthy city in accordance with Policy GG3 and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the individual policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:

- a) Will Policy G6 be likely to achieve net gains in biodiversity and consistent with national policy? Are specific provisions relating to European sites in BA necessary give other legislative requirements?**

We consider that policies G6-G9 are justified and necessary. We strongly support the new wording within paragraph D, for development to aim to secure net biodiversity gain. This increases the extent to which the Plan is consistent with paragraph 170 of the revised NPPF (2018) which states that... *'Planning policies and decisions should contribute to and enhance the natural and local environment by... minimising impacts on and providing net gains for biodiversity'*, and consistent with Paragraph 109 of the 2012 NPPF. Furthermore, a net gain approach is consistent with the 25 Year Environment Plan which aims to embed an *'environmental net gain'* principle for development. We consider this policy should be fleshed out to describe how a biodiversity net gain approach is expected to be implemented across London in order to provide an effective basis for development management. Defra has recently launched a consultation on biodiversity net gain, which can be found [here](#).

We consider that the plan distinguishes between international, national and local sites¹, and further advise that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites² should be included on a proposals map so they can be clearly identified. Designated sites should be protected and, where possible, enhanced. **The Plan should provide direction for Boroughs to consider the impacts of development in relation to designated sites as early as possible within the development planning process.** These further alterations would ensure that the plan provides an effective strategic context for the preparation of development plans.

The Plan should also make provisions for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary. In particular, in our most recent response to the HRA for the Plan, we have emphasized to the role of the GLA in supporting the development of the emerging mitigation strategy at Epping Forest Special Area of Conservation.

- b) Will Policy G7 be effective in protecting trees and woodland especially ancient woodland and veteran trees and in increasing the extent of London's urban forest?**

The 25YEP outlines the government's objectives for increasing tree cover in England. This includes a commitment to planting 1 million urban trees by 2022, as part of a broader Defra

¹ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

² The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

target to increase woodland cover in England to 12% by 2060. Street trees are an integral part of the urban landscape in London.

We welcome the additional clarity which the Mayor's Suggested Changes to the draft Plan will provide to plan preparation and planning decisions at the local level. The additional reference (paragraph 8.7.1) to the joint work by the Mayor and the Forestry Commission on producing a London Tree and Woodland Framework is noted. This should support and inform local and neighbour plans' preparation, and provide guidance for local authorities' preparing green space strategies

A London Urban Forest Strategy is vital to realise the Mayor's tree canopy ambitions and contribution to other agendas. The Strategy would be a refresh of the existing London Tree & Woodland Framework. It is based on the previous work by the London Forestry & Woodland Advisory Committee and London Tree Partnership.

The Strategy will be an opportunity to bring together the work of partners in order to help to achieve the Mayoral targets on tree planting, canopy cover and green cover.

We refer to the Forestry Commission's response for further comments on this question.

c) Does Policy G8 provide sufficient encouragement to food growing and urban agriculture?

We have no comments to make on this question.

We also refer to the Environment Agency's statement in relation to Matter 66.

In addition we would note that there other issues in relation to biodiversity and green infrastructure that the plan has addressed but which have not been captured in our response to the specific questions outlined in relation to Matters 64 and 66. We look forward to further engagement with the GLA on these issues.