

**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?**

*Creating a healthy city*

- 66.1. Yes, Policies G6-G9 provide an effective strategic context for conserving and enhancing natural habitats, encouraging more access to nature, protecting and increasing the city's tree canopy, and providing space for growing food at the local level - all of which help to improve health and well-being, and encourage healthy lifestyles. The Policies address elements of London's green infrastructure that can help to mitigate the impacts of flooding and the urban heat island, as well as other impacts of climate change, and are essential for creating a healthy city, in line with the objectives of Policy GG3.
- 66.2. The 2012 NPPF sets out principles for protecting and enhancing biodiversity, geodiversity, trees and woodland.<sup>1</sup> It sets requirements to plan biodiversity at a landscape-scale and to identify and map the components of local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. The Government's 25-year environment plan stresses the importance of the natural environment for promoting physical and mental wellbeing, particularly in urban areas.<sup>2</sup> About 20 per cent of London's land area is designated as a Site of Importance for Nature Conservation (SINC)<sup>3</sup>; these sites provide important ecosystem services for London's environment as well as providing Londoners with opportunities for contact with nature, which is beneficial for health.

*An effective strategic context and basis for development management*

- 66.3. The protection of SINCs (G6), and enhanced protection for trees and woodland (G7) have become well-established policy through the preparation and testing of successive London Plans, providing a clear framework for development plans as well as development management decisions. The more detailed criteria in the draft Plan for the protection of SINCs and of trees outside woodlands are necessary and justified on the basis that in a densely populated urban environment the benefits they provide are even more valuable because of their relative scarcity compared to less developed areas.
- 66.4. Policy G6 provides a clear framework for biodiversity assets and their protection, which takes into account sites of London-wide strategic importance, Sites of Metropolitan Importance (SMIs)<sup>4</sup>, and sites of borough and local importance, as part of a wider network. It sets out how boroughs preparing local plans and groups preparing neighbourhood plans should identify and protect sites of nature conservation importance within this strategic context. In relation to development proposals, Policy G6 clearly sets out a hierarchy of measures to avoid the loss of, or damage to, sites

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<sup>1</sup> NLP/GD/03: DCLG, National Planning Policy Framework (NPPF) March 2012, Paragraphs 109 - 119

<sup>2</sup> NLP/GD/04: HM Government, A Green Future: Our 25 Year Plan to Improve the Environment, 2018

<sup>3</sup> Greenspace Information for Greater London CIC, 'Key London Figures', 2015, Accessed via: <https://www.gigl.org.uk/keyfigures/>

<sup>4</sup> A review of SINCs was undertaken to ensure that the strategic SMIs identified were based on robust and up-to-date evidence - NLP/GI/002: Land Use Consultants, Sites of Metropolitan Importance for Nature Conservation, December 2016

and, where possible, to enhance biodiversity and ecological features, by avoiding damage to the most important features, mitigating any adverse impacts, enhancing other parts of the site, or providing off-site compensation where necessary.

- 66.5. Policy G7 sets out a strategic approach to London's trees and woodlands that provides for their protection and enhancement as part of a broader context of London's urban forest. Trees and woodlands play a crucial role as part of London's green infrastructure. They can help to trap air pollutants, add to amenity, provide shading, absorb rainwater and filter noise, thereby assisting with the implementation of other London Plan Policies<sup>5</sup>. The Policy establishes the need for boroughs to protect existing veteran trees and ancient woodland, and to identify opportunities for tree planting through development plans. Policy G7 also sets out a clear approach to assessing and protecting trees as part of development proposals. Where trees are removed as part of development proposals, Part C of the Policy ensures adequate replacement planting is provided, using an appropriate tree valuation methodology such as i-tree or CAVAT to ensure that the value and benefits of the trees are maintained.
- 66.6. Policy G8 provides a clear approach to encourage food growing opportunities within development plans. Community food growing spaces can help to support more active lifestyles and better diets and can create opportunities for social interaction, which can contribute to improved health and wellbeing. Further details on the implementation of this Policy is addressed in paragraphs 66.14 and 66.15 of the matter statement.
- 66.7. In line with the 2012 NPPF<sup>6</sup>, Policy G9 aims to prevent harm to geological conservation interests. To correct a drafting error in the numbering of sites in figure 8.2, which shows geological interests in London, an amended figure is proposed (see appendix).

**In particular:**

**a) Will Policy G6 be likely to achieve net gains in biodiversity and consistent with national policy?**

- 66.8. Yes, in accordance with the 2012 NPPF<sup>7</sup>, the Policy requires the identification of SINC and ecological corridors in order to establish coherent networks and opportunities for enhancing the conservation of priority species and habitats that sit outside of the SINC network. The proposed text set out in the Minor Suggested Changes to Part D of G6 makes explicit the policy's aim to secure net biodiversity gains as part of the identification of opportunities to enhance or create habitats and other features of biodiversity value.<sup>8</sup>
- 66.9. The SINC network in London encompasses a much wider range of habitats and nature conservation sites than would be included in a Local Wildlife Sites network at a county level, due to the relatively higher value of habitats in more densely developed areas compared with less urban environments. The protection of this network ensures that biodiversity is protected and connected throughout the city and, in combination with other policies such as Policy G5 Urban Greening, Policy G7 Trees and Woodlands and Policy SI17 Protecting and enhancing London's waterways, the overall policy

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<sup>5</sup> NLP/GI/005: Treeconomics, *Valuing London's Urban Forest - Results of the London i-Tree Eco Project*, 2015

<sup>6</sup> NLP/GD/03: DCLG, NPPF 2012, paragraph 117

<sup>7</sup> NLP/GD/03: DCLG, NPPF 2012, paragraph 117; and MHCLG, NPPF 2018, paragraph 174

<sup>8</sup> NLP/CD/09: Mayor of London, *Table of Changes - Minor Suggested Changes to the Draft new London Plan*, August 2018, Ref: MSC 8.47

framework creates opportunities for the creation of new habitats through the development and regeneration of land that is adjacent to or connects components of the SINC network.

**Are specific provisions relating to European sites in BA necessary give other legislative requirements?**

66.10 The wording set out in in the Minor Suggested Changes part BA of Policy G6 and the proposed changes to the accompanying supporting text in paragraph 8.6.1B do not set additional criteria over and above that required by legislation. However, the provisions relating to protected sites are intended to provide signposting to the key principles of the relevant legislation and to highlight the duty to consult the appropriate statutory body as part of the planning process. Following a recommendation from the Habitats Regulations Assessment (HRA), a Minor Suggested Change was proposed to Policy G6. A Further Suggested Change was made in relation to Policy H1 to more explicitly acknowledge issues connected to Epping Forest. Further details are provided in the Mayor's response to Matter 3.

**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?**

66.10. Policy G7 provides strong and effective protection for trees and woodland. It sets out principles for how existing trees should be assessed and protected or replaced as part of development proposals. The Policy ensures that the strongest protections apply to ancient woodland and veteran trees – the most irreplaceable of natural assets. All of London's ancient woodland lies within sites identified as SINCs and as such, the protections afforded for this especially important habitat are reinforced by Policy G6.

66.11. Policy G7 also states that boroughs should identify opportunities for tree planting in strategic locations as part of their development plans. This is complemented by Policy G5, which encourages the provision of trees as part of measures that can be used in meeting urban greening requirements. Semi-natural vegetation, such as trees and woodland, and standard trees in connected tree-pits are among the highest value surface cover types in table 8.2 - Urban Greening Factors (UGF) and, as such, are an effective measure that can be used to meet the relevant UGF requirements.

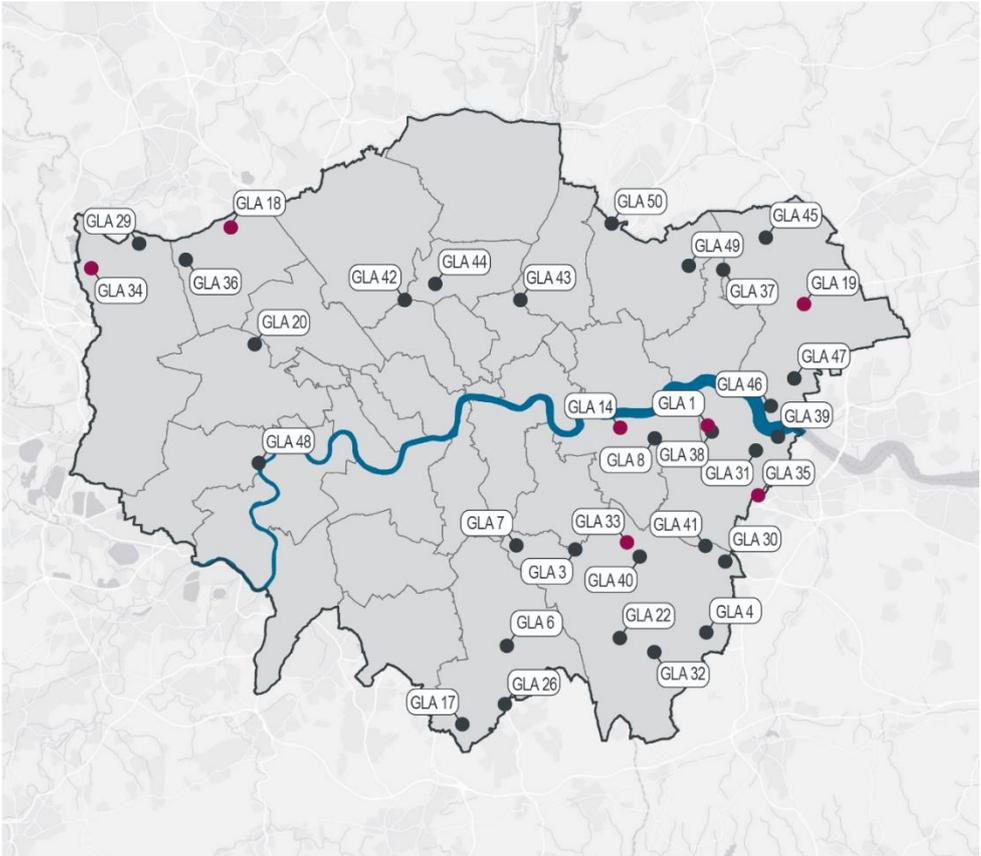
66.12. It is acknowledged that the planning process is primarily a tool for protecting trees and woodlands and ensuring that sufficient trees are planted within new developments to provide amenity and climate adaptation benefits. Meeting the Mayor's ambition to increase London's canopy cover by 10 per cent by 2050 will require a range of policy interventions and projects that sit outside of the land-use planning process. These are outlined in the London Environment Strategy and include making the economic case (through natural capital accounting and payments for ecosystem services) for the provision of financial incentives or subsidies for extensive woodland planting in the Green Belt.

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

- 66.13. Yes, Policy G8 provides clear direction to boroughs to protect existing allotments to ensure that these established food-growing spaces are safeguarded. It is recognised that there will be limited opportunities for the creation of additional traditional allotments in London and as such G8 also encourages innovative approaches to food growing, such as providing space within community gardens and on green roofs as part of new development, as well as encouraging opportunities for food growing on a meanwhile basis. G8 also directs boroughs to identify sites that could be used for commercial food growing, encouraging urban agriculture. In addition, the strong protection for Green Belt and MOL provided by Policies G2 and G3 ensures that London's existing farmland is protected and will be available for conventional agriculture or new approaches to market-gardening should, for example, suitable market conditions or subsidy regimes occur in the future.
- 66.14. The Mayor's Food Strategy complements Policy G8 and sets out how the Mayor will use other plans and programmes outside of the planning system to support existing food growing.

**Appendix 1: Further Suggested Change**

The Mayor is suggesting the following further change to Figure 8.2:

Change ref no	Policy/para /table/map	Further suggested change
M66.1	Figure 8.2	<p><i>Proposed amendments to map to correct numbering and to include SSSI sites:</i></p>  <p>Sites of National and Regional Geodiversity Importance</p> <ul style="list-style-type: none"> <li>● Sites of Special Scientific Interest (SSSIs)</li> <li>● Recommended Regionally Important Geological Sites (RIGS)</li> </ul> <p>Reference numbers refer to the appendices of the London Foundations SPG 2012</p> <p>Source: GLA Planning Contains OS data © Crown copyright and database right (2018)</p>