

London & South East

Nobel House Area 1C
17 Smith Square
London SW1P 3JR

Tel 07990 563001

craig.harrison@forestry.gov.uk

www.forestry.gov.uk/london

Mr Sadiq Khan
Mayor of London
City Hall
The Queens Walk
London
SE1 2AA

Area Director
Alison Field

London Manager
Craig Harrison

1st March 2018

Dear Mr Khan

London Plan Consultation – Forestry Commission response

The Forestry Commission welcomes the opportunity to respond to the public consultation on your draft London Plan. We, Natural England, and Environment Agency as Defra's arm's length bodies, collectively have a statutory role or interest in many of the Plan's themes. We have worked together to review the draft Plan where we have complimentary interests, and this is reflected in our organisation's responses.

The Forestry Commission mission is to protect and expand the nation's forest and increase their value to society and the environment. We are really pleased to see that our vision is very close to your aspirations as set out in the London Plan and London Environment Strategy, including the principle of good growth.

We are pleased to see that many of the environmental policies of the current London Plan have been strengthened and we welcome your ambition in the draft Plan and your draft Environment Strategy. Your updated London Plan provides the opportunity to ensure new homes are resilient, and improve the environment for existing and future generations. Impacts of climate change are already being seen with the country experiencing more extreme weather patterns. It is vital that planning decisions are made in the context of these impacts, in addition to reduced natural resources and limited environmental capacity, and that decision makers look to the benefits of maintaining and improving a healthy environment and managing flood risk. We are pleased to see many of these key themes reflected in your draft London Plan.

The government's Environment Plan, (A Green Future: Our 25 Year Plan to Improve the Environment), January 2018 sets out the government's aims to improve the environment, within a generation. We are really pleased to see that many of the draft London Plan's spatial policies will support the government's 25 year Plan, and the objectives for the environment within your draft London Environment Strategy. Nonetheless, with the recent publication of the government's plan, we suggest that there is scope to review the draft London Plan to ensure delivery of national environmental objectives.

Our main comments are summarised below, including suggested wording for Policy G7 – Trees and Woodland. More detailed responses to the Plan are included in Appendix 2.

Support for London Plan references

We welcome:

- Policy G5 on urban greening and GI as a fundamental element of major development (8.4.1)

- Reference to tree strategies (8.4.2)
- Urban greening definition and role of trees (8.5.2)
- Review of ALGG SPG but need to clarify links between ALGG and delivery of policies and Mayoral targets e.g. increase in tree canopy cover and increase in overall green cover. Maximising urban greening could benefit from making links to ALGG and its opportunities for connectivity (3.1.4)
- Recognition of GI as infrastructure that needs funding. The Mayor should take a role in identifying new sources (11.1.51)
- Links to GI and natural environment in Chapter 5 social infrastructure
- Policy S4 play and informal recreation - incorporate trees and or other greenery
- Reference to MOL and open spaces as quiet areas (D13)

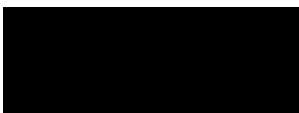
Key Messages / Comments – primarily focussed on Policy G7

Please see our suggested rewording of this policy in appendix 1.

- The Urban Forest offers multiple benefits across most of the London Plan Chapters e.g. Housing – timber construction and use of home grown timber to help deliver low carbon, circular economy; contributing to the Healthy Streets programme; helping ensure the city is resilient.
- It is crucial that the urban forest is protect & improved as well as expanded – otherwise the Mayoral ambition for tree canopy increase is unlikely to be realised
- A London Urban Forest Strategy is vital to realise the Mayor’s tree canopy ambitions and contribution to other agendas. It should be referenced in the London Plan and London Environment Strategy.
 - The Strategy/Plan could be referred to a refresh of the existing London Tree & Woodland Framework and based on the previous work that the London Forestry & Woodland Advisory Committee and London Tree Partnership has done on “A Forest for all Londoners”; also embedding the vision and principles behind the published Urban FWAC documents e.g. A vision for a Resilient Urban Forest.
 - 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.
- Urban forest management – as with other activities – should be targeted for maximum benefit e.g. tree and woodland planting in areas where green space/tree cover is low and/or there is limited access to nature
- There are significant Woodland creation opportunities in the green belt that would increase green belt multi-purpose delivery of benefits beyond just prevention of development / urban sprawl
- Policy G7 needs to refer to strategic action such as tree strategies to convert your ambition into reality. Reference to other strategic documents would also be helpful such ‘A Vision for a Resilient Urban Forest’ which was produced by the Urban FWAC network, plus Trees & Design Action Group publications.

If you or your team have any queries about our response please do not hesitate to contact me.

Yours sincerely



Craig Harrison
Forestry Commission
London Manager

Appendix 1: Suggested wording for Policy G7 Trees and woodlands

- A Trees and woodlands should be protected and managed, and new trees and woodlands should be planted in appropriate locations - in order to increase the extent of London's urban forest and associated social and environmental benefits.
- B Borough Tree Strategies, Opportunity Areas and Development Plans should consider how London's urban forest can be expanded and enhanced by:
- 1) protecting 'veteran' trees, ancient woodland and other trees of quality¹⁰⁸ where these are not already part of a protected site.
 - 2) identifying the potential for more active, sustainable management of woodland and trees to deliver more benefits such as biodiversity and public access.
 - 3) identifying opportunities for tree planting in strategic locations.
- C Development proposals should ensure that, wherever possible, existing trees of quality are retained¹⁰⁸. Where tree removal is absolutely necessary, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, methodologies such as i-Tree¹⁰⁹ or CAVAT¹¹⁰. The planting of additional trees should generally be included in new developments, particularly large-canopied species.

8.7.1 Trees and woodlands play an important role within the urban environment. They help to trap air pollutants, provide shading, absorb rainwater and filter noise. They also provide extensive areas of habitat for wildlife, especially mature trees. The urban forest is an important element of London's green infrastructure and comprises all the trees in the urban realm, in both public and private spaces, along linear routes and waterways, and in amenity areas.

8.7.2 An i-Tree Eco Assessment of London's trees quantified the benefits and services provided by the capital's urban forest¹⁰⁹. This demonstrated that London's existing trees and woodlands provide services (such as pollution removal, carbon storage, and storm water attenuation) valued at £133 million per year, and that these services are best provided by mature, large canopy trees. The cost of replacing these services if the urban forest was lost was calculated at £6.12 billion. Consequently, when trees are removed the asset is degraded and the compensation required in terms of substitute planting to replace services lost should be based on a recognised tree valuation method such as CAVAT¹¹⁰ or i-Tree Eco¹⁰⁹.

8.7.3 The Mayor wants to increase tree cover in London by 10 per cent by 2050. Trees should be designed into developments from the outset to maximise tree planting opportunities and optimise establishment and vigorous growth. When preparing more detailed planning guidance boroughs are also advised to refer to good urban forest practice guidance¹¹¹ including Right Trees for a Changing Climate¹¹² and guidance produced by the Trees and Design Action Group¹¹³.

8.7.4 The Mayor and Forestry Commission have produced Supplementary Planning Guidance on preparing tree strategies to help boroughs plan for the management of the urban forest¹¹⁴. These should be part of boroughs' wider green infrastructure strategies. The urban forest is managed by a multitude of owners, so requires collaboration to maximise urban forest benefit delivery – to date via the London Tree & Woodland Framework¹¹⁵. Through the London Tree Partnership, which includes all of the main urban forest organisations in London including the Greater London Authority and Forestry Commission, a refreshed plan should be produced that facilitates collaborative working to deliver the Mayor's ambition for increased tree canopy cover.

108 Category A and B trees as defined by BS 5837: 2012

109 www.forestry.gov.uk/london-itree; https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_i-tree_report_final.pdf

110 <https://www.ltoa.org.uk/resources/cavat>

111 www.forestry.gov.uk/london-practice

112 <http://www.righttrees4cc.org.uk>

113 <http://www.tdag.org.uk/guides--resources.html>

114 <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland>

115 www.forestry.gov.uk/lwtf

Appendix 2

General comments

- The definition of Urban Forest – and how it is referred to in this response – is “The urban forest comprises all the trees in the urban realm – in public and private spaces, along linear routes and waterways and in amenity areas. It contributes to green infrastructure and the wider urban ecosystem”.
- The London Plan should take account of the Government’s 25 Year Environment Plan including the Natural Capital Approach (developing a common understanding and ensuring it influences future decision making); Increase in greenspace and tree canopy cover; access to and connecting people with nature.
- The London Plan should complement the London Environment Strategy in terms of objectives and ambition such as Green Infrastructure.
- Due regard needs to be given to areas surrounding Greater London, as they are so inexorably linked. The urban forest and other GI does not respect administrative boundaries, and maximum benefit for London will be achieved if considered more holistically.
- When developing opportunity areas and development plans, green infrastructure and the urban forest should be a material consideration to maximise benefits delivery and built/green environment integration.

Chapter 7

G1 GI – The ALGG approach could be more effective and inform opportunity areas and development plans, and support it being reviewed. Net loss/gain could be applied to the urban forest, recognising that the loss of 1 large tree needs to be balanced with substantial new planting. Methods such as i-Tree and CAVAT provide methodologies to apply such approaches, and is already being used by some Boroughs.

G5 Urban Greening - given housing proposals emphasise the contribution of smaller developments, need to ensure net gain is achieved there too; accessible green space must be preferred to inaccessible green space where possible, in recognition that exclusive GI may provide broad benefits but lacks local appreciation.

The basis for **Green Space Factor** proposed values seems unbalanced. We fully understand and support the importance of green roofs and walls especially in inner London but the score doesn't reflect the benefits delivery compared with semi natural vegetation or street tree planting in terms of multiple benefits, longevity of benefit delivery, cost/benefit and accessibility to nature.

G6 Biodiversity & access to nature – London’s Urban Forest is a key opportunity for place making and community engagement/involvement e.g. tree planting, local woodland management, empowering people and businesses to water street trees outside their property. We support the more detailed responses on this from Natural England and Environment Agency.

G7 Trees & Woodlands

We support the aim of increasing the extent of London’s Urban Forest and Plan recognition that this requires not only new planting but protection of existing trees & woodland. With sustainable management, the existing urban forest could deliver more public benefits such as biodiversity enhancement and public access enhancement. Our [recent report on London’s woodlands](#) has highlighted this as an issue/opportunity.

To realise your ambitions for the urban forest, a Plan or Strategy is needed to facilitate a collaborative delivery programme - [the London Plan should refer to a refreshed London Tree & Woodland Framework](#) which has stood the test of time well since its publication in 2006. A refreshed Framework/Plan/Strategy should collate existing activity that contributes to the

ambition, identify additional activities that could be delivered through adjusted current activity and identify where new approach may be needed. We do not see the GLA as the leader in developing such plans, but a leader alongside key London Tree Partnership members – in line with preparatory work that the partnership and London Forestry & Woodland Advisory Committee has already been done.

We welcome the reference to Trees & Design Action Group publications and suggest it should also include publications produced by the Urban Forestry FWAC Network on a [Resilient Urban Forest Vision](#) and supporting documents.

The London Plan should also refer to the SPG on Borough Tree Strategies, enabling Boroughs to develop a strategic approach to urban forest management. Borough strategies should include Tree and woodland protection, planting and maintenance and opportunities for planting new trees which will help deliver your ambitions for London.

Woodland management plans should be encouraged where they don't exist, especially as part of development plans/opportunity areas – without approved plans it is difficult to determine whether woodland is being duly protected and sustainably managed. Opportunities should be sought to accommodate natural colonisation/regeneration of trees and woodland where it is desirable and achievable, particularly in or next to semi-natural habitats.

G8 Food growing - orchards have proved a valuable entry point for communities to connect with their local greenspace, enhancing residential areas and engaging people in orchard planting and maintenance work. This approach could be expanded to include the urban forest more widely and thus develop more community awareness, engagement and involvement.

Other Chapters

Chapter 1

GG1 – The urban forest provides a crucial backdrop, improving everyone's daily lives; this applies across all ages from cradle to grave and supporting community cohesion.

GG2 - best use of land - urban forests is a champion of multi-functional land use delivering social, environmental and economic benefits; there is significant scope to improve land use benefits through e.g. woodland creation on green belt and other land – and should be considered as part of Opportunity Areas and Development Plans.

GG3 Healthy City – There is a vast amount of evidence showing how the urban forest improves health and wellbeing for all ages. The [Green Cities: Good Health](#) resources provide an excellent range of evidence about the multitude of health benefits from the urban forest.

GG5 Growing a good economy - Given London has 20% tree canopy cover, it plays a major role in making the City attractive that generate investment and economic growth. The London Plan and LES ambitions for tree canopy increase will assist this and also support the provisioning Ecosystem services that the urban forest provides (wood, fruit, recreation etc).

GG6 resilience - London cannot be a resilient city without a resilient urban forest. The urban forest will help the city regulate temperature and improve water management & air quality. Tree canopy cover increase will help this but consideration is also needed regarding a future treescape that is more diverse and designed to cope with expected pressures such as climate change and urban heat island.

SD2 – We support collaboration in the wide SE of England to deliver benefits within and beyond London.

Chapter 3 - Design

D1 London's form & characteristics - in order to create a resilient city with resilient urban forest, the London Plan needs to recognise that the treescape will evolve over time. London's urban forest needs to diversify in terms of tree species and composition where it is currently vulnerable,

to create a future mature treescape that is valued but will look different to what we see now e.g. moving away from the avenues of London plane which are highly vulnerable to future threats.

D7 Public Realm - trees offer some of greatest opportunities to enhance public realm, increase their usage and nudge behaviours e.g. tree lined streets will encourage walking and cycling. Reduction of future car parking should provide increased tree planting and street enhancement opportunities.

Chapter 4 Housing

Timber frame construction offers huge future potential to help meet housing demand whilst also contributing to zero carbon, zero waste ambitions. Technologies already available such as Cross Laminated Timber (CLT) enable timber construction and have already been used in London, with scope to do much more. Emerging technical developments that can further increase timber construction opportunities. Increased use of timber in construction provides an opportunity to use UK sustainably produced timber. The use of sustainable timber from London's urban forest can help give new developments and communities a sense of place. This would all support 'good growth' and both the national and London economy.

Chapter 9 - Sustainable Infrastructure

We support the Plan's recognition that GI is an important component of sustainable infrastructure including the urban forest. London trees and woodlands can make significant contributions to the circular economy, zero carbon, waste, air & water quality etc.

SI7 reducing waste and supporting the circular economy - urban forest management not only ensures tree canopy is protected, maintained and increased but also supports the circular economy. We recommend strengthened wording about the re-use of timber from trees that are necessarily felled during development or other tree operations. At present an unnecessary amount of tree produce is chipped and taken as waste. Re-use not only reduces waste but can be utilised on site to give a sense of place and connect residents with nature. e.g. Elephant & Castle, Thamesmead.

SI13 Sustainable Drainage - Trees can play a key role in reducing stormwater as evidenced in the i-Tree report; they provide multifunctional solutions including sustainable drainage.