

**Draft London Plan consultation  
London Tree Officers Association response  
23 February 2018**

Policy number	Policy title	Policy part where applicable	Comment
Policy G1	Green infrastructure	G1(a) London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure	The policy does not reference privately owned trees, nor publicly owned trees in areas other than streets. This is a serious omission as the entirety of trees in London are a principal component of green infrastructure (GI). The London Tree Officers Association (LTOA) consider that the word 'street' is deleted before 'trees' in the policy, namely 'features in the built environment such as green roofs and trees, should be protected'
Policy G1	Green infrastructure	G1(b) Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.	The LTOA considers that trees should be included in the policy wording, as they are the principal component of GI strategies, namely: 'objectives relating to open space provision, trees, biodiversity conservation, flood management, health and wellbeing, sport and recreation'
Policy G1	Green infrastructure	8.1.3 'To help deliver on his manifesto commitment to make London at least 50 per cent green by 2050'	The target requires quantifying, with a baseline analysis, and further detail on 'what making London at least 50 per cent green' means. Without such data the LTOA find it difficult to support the aspiration.
Policy G2	London's Green Belt	Whole policy	The LTOA broadly supports this policy
Policy G3	Metropolitan Open Land	Whole policy	The LTOA broadly supports this policy
Policy G4	Local green and open space	Whole policy	The policy direction to increase housing capacity in the capital is in direct conflict with the preservation and improvement of existing local green space and school playing fields. The LTOA considers this conflict needs to be addressed.

Policy G5	Urban greening	Whole policy, 8.5.4 and table 8.2	The LTOA consider the urban greening factor to be a matter which is too prescriptive for the London plan. We are supportive in principle subject to further research and material to support this, but this matter should not be prescribed in a strategic plan, and is better addressed in supplementary planning guidance. Should it remain in the London plan the LTOA specifically disagree with the factor ratings given to trees at table 8.2, in view of the non- sustainable nature of trees planted without sufficient soil volume.
Policy G5	Urban greening	8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.	The LTOA consider that the word 'street' should be deleted before 'trees' in this supporting text, for the reasons above in G1(a)
Policy G6	Biodiversity and access to nature	Whole policy	The LTOA broadly supports this policy
Policy G7	Trees and woodlands	G7(a) Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.	The LTOA considers that trees and woodlands should be protected, maintained and enhanced, rather than simply 'protected'. This follows from the previous policy. 7.2.1 which states 'Trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework (or any successor strategy)'.
Policy G7	Trees and woodlands	G7(c) and footnote 108 Development proposals should ensure that, wherever possible, existing trees of quality are retained [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 generally be included in new developments – particularly large-canopied	The LTOA considers that the wording 'existing trees of quality are retained' should be substituted with 'existing trees of value' as in the previous plan, as 'value' encompasses amenity, biodiversity, and ecosystem services benefits.  The footnote 108 say trees of 'quality' are defined as 'Category A and B trees as defined by BS 5837:2012', but this is not a correct interpretation of the BS. It risks the removal of trees which categorised as 'C' but are important in their overall value,

		<p>species which provide a wider range of benefits because of the larger surface area of their canopy.</p>	<p>or are integral to the composition and ecological quality and functioning of woodlands or groups of trees which are of significant amenity and biodiversity value. The LTOA considers it imperative that this footnote is revised, and the suggested replacement wording is 'Category A, B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS 5837:2012, and Natural England and Forestry Commission standing guidance 2018: <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a>'.</p> <p>The LTOA considers that the wording 'If it is imperative that trees have to be removed' should be substituted with the wording 'If planning permission is granted for a development which necessitates the removal of trees', to avoid ambiguity about who considers it is imperative that trees should be removed, namely the applicant or developer who may consider it an imperative, as opposed to the local planning authority, who may not consider it an imperative.</p> <p>The LTOA considers that the wording 'determined by, for example, i-tree or CAVAT' should be supplemented with 'determined by, for example, i-tree or CAVAT' or other appropriate valuation system'.</p> <p>The LTOA consider that the wording 'there should be adequate replacement based on the existing value of the benefits of the trees removed' is not sufficiently explicit, as it suggests that, for example, a green roof is an adequate substitute for a tree. We do not agree. The suggested alternative wording is 'there should be adequate replacement tree planting based on the existing value of the benefits of the trees removed.'</p>
Policy G7	Trees and woodlands	<p>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</p>	<p>The LTOA considers that the 'amenity' that trees provide should be included in this supporting text, because the preservation of trees for their amenity is the principle purpose for the statutory protection that is offered to trees, and because this is the attribute Londoners primarily associate with trees.</p>

		<p>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. The Mayor and Forestry Commission, have produced Supplementary Planning Guidance on preparing tree strategies to help boroughs plan for the management of the urban forest[109]. These should be part of boroughs' wider green infrastructure strategies.</p>	
Policy G7	Trees and woodlands	<p>8.7.2 and footnote 110 and 111  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 Right Trees for a Changing Climate[110] and guidance produced by the Trees and Design Action Group[111], a multi-disciplinary cross-partnership forum seeking to promote urban forests.</p>	<p>The LTOA considers that increase in tree cover should refer to 'tree canopy cover', as 'tree cover' is ambiguous. As with policy G1, the target of '10 per cent by 2050' requires quantifying, with reference to a baseline analysis. .</p> <p>Footnote 110 and 111. There are multiple advisory notes about which trees are appropriate to plant, and the LTOA considers that rather than refer to just two such documents, policy wording should state 'When preparing more detailed planning guidance boroughs are also advised to refer to their own professional arboriculturalist.</p>
Policy G7	Trees and woodlands	<p>8.7.3  An i-Tree Eco Assessment of London's trees quantified the benefits and services provided by the capital's urban forest [112]. 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. 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 CAVAT[113] or i-Tree Eco[114].</p>	<p>The LTOA consider this to be a scene setting paragraph and unnecessary.</p>

Policy S113	Sustainable drainage	SI13(B) Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy	The LTOA consider that natural attenuation should be listed as number 1. We also consider that trees essential as a solution to sustainable drainage and should be referenced explicitly.
Policy T2	Healthy Streets	Whole policy	The LTOA considers that there should be a specific reference to both street trees and tree in private gardens in this policy, as they are a principle constituent in the provision of healthy streets.
Policy D7	Public realm	Whole policy	The LTOA considers that a specific reference to both street trees and tree in private gardens should be included in this policy, as they are a principle component of the pubic realm.
Policy S7	Burial space	5.7.4 When making new provision, boroughs are encouraged to take into account the Mayor's broader aims for green infrastructure and the natural environment, including, but not limited to, the creation of new parks and open spaces, the enhancement of existing open spaces and natural environments, and the provision of enhanced links to London's green infrastructure. Woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.	The LTOA considers that a specific reference to trees should be included in this paragraph. In this paragraph there is a sole reference in the draft plan to 'amenity' but the reference to the amenity that trees provide is lacking in other policies and supporting text is