

Consultation Response

London Environment Strategy Consultation

Response from the Woodland
Trust

December 2017



WOODLAND
TRUST

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“ The recognition of the importance of trees and green space to people’s health and wellbeing is very welcome, as are the proposals for more tree planting and new woodland areas in order to enhance the quality of the urban environment.”

Introduction - About the Woodland Trust

The Woodland Trust is the UK’s leading woodland conservation charity, and wants to see a UK rich in native woods and trees, for people and wildlife. The Trust aims to achieve this by restoring and improving woodland biodiversity and increasing people’s understanding and enjoyment of woods and trees. The Trust owns and safeguards over 1,000 woods across the UK (including 5 in London) and has more than 500,000 members and supporters.

Answers to questions asked in the online consultation

There is an element of repetition, due to the format of the document and questions laid out under each chapter. Some questions are not answered, as they are outside the Trust’s remit.



Nicola Trussell

Overarching questions

Question 1: Do you agree with the overall vision and principles of this draft London Environment Strategy?

YES. It's good to see the Mayor accept there is a problem, and that the role of the environment in improving health and wellbeing, equality, community cohesion and the economy are all highlighted in the draft London Environment Strategy (LES). The recognition of the importance of trees and green space to people's health and wellbeing is also very welcome, as are the proposals for more tree planting and new woodland areas in order to enhance the quality of the urban environment. The aim to increase tree canopy cover by 10% by 2050 is a welcome ambition that can be achieved with resources and commitment and good partnership working with stakeholders such as the Woodland Trust.

2. To achieve the policies and proposals in this strategy, which organisations should the Mayor call upon to do more (for example central and local government and businesses) and what should the priorities be?

This answer solely relates to the Green Infrastructure (GI) and Urban Forest aspects of the LES.

The Mayor should call on Government departments and agencies such as DCLG, Defra, Forestry Commission and Natural England should support the Mayor's ambitions by: working to increase protection in the NPPF for ancient woodland and veteran trees (by bringing policy protection in line with that offered to man-made designated heritage assets); lowering the area thresholds and reducing administrative barriers for Environmental Stewardship grants (such as for woodland creation); endorse and develop the Natural Capital and Ecosystem Services principles and investigate payments for Ecosystem Services post-Brexit.

Local government needs to embed the ambition into their own strategies, and should review their Local Plans promptly after the final London Plan has been published.

NGOs such as the Woodland Trust have a role too, in delivery and providing value for money and community involvement.

The Woodland Trust is the country's largest woodland charity and has unparalleled experience of managing woodland and planting trees, including with community participation.

3. Do you agree that this draft London Environment Strategy covers all the major environmental issues facing London?

The draft LES doesn't include all the issues raised in the Mayor's Biodiversity Strategy (GLA, 2002) in which there were 72 proposals. Reviews of the Biodiversity Strategy by the London Assembly's Environment Committee in 2013 (and referred to again in 2016), recognised that the Biodiversity Strategy was then largely 'fit for purpose' but that an update was required (to reflect changes to national policy and legislation). Issues that the Biodiversity Strategy covered

that have not been included in the LES include:

- The role of (and need for) ecological resources in London borough councils;
- Model policies for Borough Plans;
- Mayoral planning referrals for Sites of Metropolitan Importance to nature conservation;
- Planning advice on biodiversity issues;
- Support for wildlife crime enforcement;
- Rolling habitat survey;
- Support for declaration of Local Nature Reserves;
- Active research into public awareness of biodiversity in London.

There are also detailed proposals in the Mayors London Tree and Woodland Framework (GLA, 2005) that if not captured in the LES could be usefully laid out in an "Urban Forest Action Plan", along the lines of other Action Plans the Mayor has published alongside draft strategies. The London Tree Partnership (LTP) has considered such a plan under the working title "A Forest for all Londoners", and this offers a means of gathering collaborative support towards common aims and developing a range of delivery tools (including policy, regulation, funding, communication, good practice) and agreed actions by partners. Such a plan would be a means of making progress on private land as well as public realm, and the LTP (or the London



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4. There are a number of targets and milestones in this draft London Environment Strategy, what do you think are the main key performance indicators that would demonstrate progress against this integrated strategy?

This answer solely relates to the GI and Urban Forest aspects of the LES. Suggested KPIs:

- No loss of ancient woodland;
- No loss of veteran or ancient trees;
- Number of wildlife sites with active management plans;
- Increase in tree canopy cover;
- Reduction in Areas of Deficiency for Access to Nature (see Improving Londoners' Access to Nature (GLA, 2008) for details of how this can be achieved: www.london.gov.uk/sites/default/files/uploads-access-to-nature.pdf)
- Number of schools providing children with a regular experience of nature (such as Forest Schools).

5. What are the most important changes Londoners may need to make to achieve the outcomes and ambition of this strategy? What are the best ways to support them to do this?

This answer solely relates to the GI and Urban Forest aspects of the LES.

Londoners need to have access to nature and high quality GI in order to get the most of the benefits. Reinstatement, and indeed a re-invigoration (with more features for public involvement, such as uploading images), of Wildweb would be one tool to help achieve this.

The GLA and partners should raise awareness of the issues and encourage more positive behaviour on Londoners' own land, such as front and back gardens and on land owned by businesses (including car parks).

Amongst the benefits of trees and GI are physical and mental health improvements, so the Public Health sector in London has a role to ensure health professionals harness this more (opportunities for the public to engage in healthy walking, green gym, forest bathing).

Air Quality

1. Do you agree that the policies and proposals outlined will meet the Mayor's ambitions for air quality in London and zero emission transport by 2050? Is the proposed approach and pace realistic and achievable, and what further powers might be required?

No comment

2. Do you agree with the Mayor's policies and proposals to raise Londoners' awareness of the impacts of poor air quality?

No comment

3. Do you agree with the Mayor's policies and proposals to safeguard the most vulnerable from poor air quality?

No comment

4. Would you support emergency measures, such as short-term road closures or vehicle restriction, during the periods of worst air pollution (normally once or twice a year)?

No comment

5. Do you agree with the proposed approach to reducing emissions from non-transport sources (including new buildings, construction equipment, rail and river vehicles and solid fuel burning)?

The Trust recognises the contribution of wood burning stoves to air pollution and welcomes the Mayors proposals to tackle this (Policies 4.2.4a&b; Policy 4.3.3), however it should be noted that this is caused by the use of unregulated appliances and fuel. The Trust supports the need to raise awareness on Smoke Control Zones, Defra-exempt appliances and use of the correct woodfuel (type and moisture content). When responsibly sourced and used, woodfuel is a renewable carbon-neutral fuel. The air quality polices should be co-ordinated with policy 5.2.1c (management of habitat), to make the most of the opportunity to encourage better management of existing woodland and production of an accredited London woodfuel supply that meets air quality aspirations. Furthermore, the management of the wider urban forest could be channelled through accredited timber stations that could supply biofuel CHP stations, thus reducing the demands for imported fuels. This would in turn deliver across the other Mayoral ambitions of a circular economy and climate change mitigation.

6. Please provide any further comments on the policies and programmes mentioned in this chapter.

While tackling the source and scale of emissions is clearly the first priority, when dealing with the residual pollution, natural solutions, especially street trees and hedges, could be given more priority than some single-issue technical fixes. Their contribution to so many other issues such as:

reducing noise from roads; surface water flooding; water quality; urban over-heating, and; increasing biodiversity should be more actively considered. There should be a clear cross-reference to the Green Infrastructure chapter, where trees and wooded areas in the right places are proposed as natural solutions to many challenges.

The Trust is disappointed to see the pledge to support only the 50 schools with the worst pollution – this is a low target given the number of schools in London and the scale of the problem. Natural solutions such as street trees and hedges certainly have a role here, so perhaps could be used for other schools where technical fixes aren't feasible, and comparisons made.



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Green Infrastructure

1. The Mayor's ambition is to make London a National Park City. What should the attributes of a National Park City be and what would we need to achieve for it to be considered successful?

The concept of a National Park City has certainly raised the profile of the wildlife and landscape value of London, but the parameters for such a designation should be agreed with the foundation and stakeholders. A key principle should be additionality – i.e. that actions and associated funding are complementary to the existing work of current stakeholders, and doesn't merely replace and centralise such activity.

2. In what ways can the Mayor help to ensure a more strategic and coordinated approach to the management of London's network of parks and green spaces?

The suggestion to establish a "London Green Spaces Commission" is welcomed.

There is an opportunity to lower management input for more biodiversity benefit, such as reducing mowing and planting more trees – the evidence in *Trees or Turf?* (Woodland Trust and Land Use Consultants, 2011, www.woodlandtrust.org.uk/publications/2011/05/trees-or-turf/) should be referenced in the LES. The Mayor could consider requesting new powers for raising a levy to support sustainable management of public parks and green spaces drawing upon examples from elsewhere in the world.

3. Do you think the proposed policies and programmes will ensure London's important wildlife is protected and enhanced?

Protection for wildlife is promised in the strategy, but the strength of such protection will be dependent on the policies in the new draft London Plan, due to be published early next year, and on making sure those policies are repeated and adhered to by London boroughs. The latter will only happen if staff and resources at City Hall are committed to responding to Borough Local Plan consultations, and scrutinising planning applications that might adversely affect green infrastructure. Such a commitment should be made clear in the LES.

Ancient woodland and veteran trees are the only habitats mentioned in the National Planning Policy Framework, and the government has recently confirmed its ambition to increase their protection from development. Therefore, the Mayor should bring policy protection of these irreplaceable natural assets in line with that offered to man-made designated heritage assets. Furthermore, ancient woodland should be added to the list of designations over which the Mayor has "call-in" powers for planning applications, and although this may have to wait for the London Plan, such a commitment could be referenced in the LES (for example either in Proposal 5.1.1a or in the amplification of Proposal 5.2.1a).

Although the London Plan has policies on trees, there are already threats to veteran trees in London. Furthermore, we simply don't know the extent and number of ancient and veteran trees in London, so more may be lost than we are aware of. There should be a programme to complete the Ancient Tree Inventory for London, and establish a register of Trees of National Special Interest within London.

Few of London's woodlands are actively or sustainably managed, which results in lower delivery of benefits such as carbon capture, circular economy, biodiversity, recreation value, public health and wellbeing. Helping to stimulate demand for urban forest products (including non-wood products such as food) increases the amount of woodland in active management and could raise awareness of other issues such as Smoke Control Zones, Defra-exempt appliances and use of the correct woodfuel (supporting Policies 4.2.4a&b; Policy 4.3.3). The recently formed London Wood Enterprise Network could be instrumental in how London's urban forest is managed and increase Londoners connection with the urban forest.

4. Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?

No, not without greater detail and commitment. Firstly, clarification is needed on the baseline figure for canopy cover and what technique is used for measurement (and hence how the increase will be measured) needs clarifying! There is a debate amongst stakeholders about the existing baseline, depending on the means of measuring it – and some techniques indicate canopy cover is already at 22%.

The ambition for woodland creation in the urban fringe is welcomed. A key action to achieve this will be a proactive search for suitable land for planting, especially in the urban fringe. This may also require buying and preparing land for woodland creation, a process the Mayor has separately suggested for providing new and affordable housing land.

While availability of land may be a constraint, this should not prevent targeting of delivering woodland creation where it will deliver the most benefit, in line with the recommendations of the third report of the Natural Capital Committee. One primary criterion should be the Woodland Access Standard (WAS_t) - researched and developed by the Woodland Trust and endorsed by the Forestry Commission. The WAS_t is complimentary to Natural England's Accessible Natural Greenspace Standard and the data is revised periodically (latest version here: www.woodlandtrust.org.uk/publications/2017/06/space-for-people-2017/). The latest data can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form.

Furthermore, targeting of woodland creation is an opportunity to improve green belt land, not just protect it. iTree Eco assessments indicate there is land in the green belt that currently has low GI benefits, so planting woodland on vacant and/or under-managed land could provide productive,

biodiverse community woodlands that also store carbon, remove air pollutants, reduce flood risk and lower ambient noise.

It is also important to ensure good practice is implemented, and hence Value for Money is delivered by Mayoral funds (selection of location, species, planting volume, protection, stocking density, maintenance etc.) – the Woodland Trust can supply both written guidance and practical help on this. The Woodland Trust is the country's largest woodland charity and has unparalleled experience of planting trees, with both landowner and community participation, therefore should be added to the list of partner organisations in the first paragraph of justification after Proposal 5.1.1f.

5. How best can natural capital thinking be used to secure greater investment in the capital's green infrastructure?

The LES sets out adequately the Natural Capital approach but could say more on the revenue benefits or Ecosystem Services provided by GI, green spaces and in particular woodland and trees. While the iTree statistics and accompanying diagrams are illuminating, the report by Europe Economics (*The Economic Benefits of Woodland*, 2015, <https://www.woodlandtrust.org.uk/publications/2015/03/the-economic-benefits-of-woodland/>) provides additional useful data, and should be referenced in the LES.

The Mayor should lobby for "payments for Ecosystem Services" to be included in a fresh approach to securing our environmental future.

For many years it has proved difficult to promote the idea of an integrated approach to land use that balances development with productivity and nature conservation - and to do so in a way that meets the needs of today's society without depleting the natural systems that underpin our long-term welfare. With 70% of land in the UK under agriculture, one of the biggest barriers to such an approach has been the monolithic Common Agriculture Policy (CAP). The prospect of the CAP being dismantled and the creation of a new land-use payment system, as a consequence of our leaving the EU, throws up the best opportunity in a generation to rethink our environmental futures. It offers real scope for a genuinely collaborative approach to building a new suite of environmental and land use policies, with the following principles embedded:

- Target public support to secure a wide range of defined environmental outcomes that are of benefit to us all.
- Support for landowners who recognise and maintain valuable environmental features wherever they occur.
- Recognition that these environmental benefits are public goods, underpinned by responsible land management – for which the land manager should be rewarded.
- Support to maintain the range of crucial public benefits that flow from the natural environment designed in a way that can be delivered alongside food production.

Such a revenue stream for land use would aid sustainable management of both publicly and privately owned green spaces.

6. Please provide any further comments on the policies and programmes mentioned in this chapter.

Most of the many benefits of high canopy cover are summarised, along with the appropriate references for the background research and evidence, in the Trust's publication Residential Development and Trees (2015, www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/). Therefore "Tree Canopy" should be added to both the policy wording and justification of Proposal 5.1.1d on page 152, and reference made to the above document.

Many of the comments above would be addressed in an "Urban Forest Action Plan", along the lines of other Action Plans the Mayor has published alongside draft strategies. The London Tree Partnership (LTP) has considered such a plan under the working title "A Forest for all Londoners", and this offers a means of gathering collaborative support towards common aims and developing a range of delivery tools (including policy, regulation, funding, communication, good practice) and agreed actions by partners. Such a plan would be a means of making progress on private land as well as public realm, and the LTP (or the London Forestry and Woodland Advisory Committee) could play a role in supporting and overseeing delivery.

Proposal 5.2.1b states that "The Mayor will seek to implement an approach for London to biodiversity offsetting". This approach must recognise that loss of irreplaceable habitats such as ancient woodland cannot be offset, and that such loss always constitutes a "Net Loss" of Biodiversity, irrespective of how much compensation is proposed.

Climate Change Mitigation and Energy

1. Do you agree that the policies and proposals outlined will meet the Mayor's ambition to make London a zero carbon city by 2050? Is the proposed approach and pace realistic and achievable?

No comment

2. To achieve the Mayor's zero carbon ambition we estimate (between now and 2050), up to 100,000 homes will need to be retrofitted every year with energy efficiency measures. Do you agree with the Mayor's policies and proposals to achieve his contribution to this? What more can central government and others do to achieve this?

No comment

3. Which policies or programmes would most motivate businesses to reduce energy use and carbon emissions?

No comment

4. Please provide any further comments on the policies and programmes mentioned in this chapter, including those in the draft solar action plan and draft fuel poverty action plan that accompany this strategy.

London's urban forest offers one of the greatest opportunities to reduce carbon by sequestering it and locking it in wood. The Woodland Carbon Code allows tree planting to be used for dealing with the residual carbon for Zero Carbon homes.

Timber construction should be favoured over high embedded-carbon traditional products such as concrete and steel.

2.5M tonnes of carbon is locked in London's urban forest, but furthermore the need for protection of existing ancient woodland highlighted earlier has an additional benefit of carbon stored in ancient woodland soils.

When responsibly sourced and used, woodfuel is a renewable carbon-neutral fuel. Co-ordinating, the air quality policies (on the use of unregulated appliances and fuel - Policies 4.2.4a&b; Policy 4.3.3) with policy 5.2.1c (management of habitat), will provide an opportunity to encourage better management of existing woodland and the production of an accredited London woodfuel supply that meets air quality aspirations and reduces use of non-renewable fossil fuels. Furthermore, the management of the wider urban forest could be channelled through accredited timber stations that could supply biofuel CHP stations. This would deliver across the other Mayoral ambition of a circular economy, as well as climate change mitigation and biodiversity benefits.

Waste

1. Do you agree that the Mayor's policies and proposals will effectively help Londoners and businesses to recycle more?

No comment

2. Do you support the Mayor's ambition to ensure food waste and the six main recyclable materials (glass, cans, paper, card, plastic bottles and mixed plastics) are collected consistently across London?

No comment

3. Do you think the Mayor should set borough specific household waste recycling targets?

No comment

4. What needs to happen to tackle poor recycling performance in flats?

No comment

5. What are the most effective measures to reduce single-use packaging in London such as water bottles and coffee cups?

No comment

6. Please provide any further comments on the policies and programmes mentioned in this chapter.

No comment



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Climate Change Adaptation

1. Do you think the Mayor's policies and proposals are sufficient to increase London's resilience to climate change?

Not without be a clear cross-reference to the Green Infrastructure chapter, where the right trees and wooded areas in the right places are proposed as natural solutions to many challenges. Without a resilient urban forest, London will not be a resilient city in the face of the challenges climate change is bringing. The urban forest offers one of the greatest opportunities for long-term successful adaptation. Increasing tree canopy cover and addressing inequality in cover will increase resilience as well as providing other collateral benefits. Trees are the most multi-functional and arguably the most easily retrofitted component of GI, and should be used where their adaptation benefits are most needed, as it is here that they are particularly valuable.

2. Do you agree with the Mayor's policies and proposals to make Londoners, more aware of the risks of climate change, like overheating in buildings and flooding following heavy downpours?

No comment

3. Do you agree with the Mayor's policies and proposals to reduce water demand and leakages in London?

No comment

4. What do you see as

The Woodland Trust agrees that trees and woodlands can deliver a major contribution to resolving a range of water management issues resulting from climate change, such as flooding and the water quality implications caused by extreme weather events. Trees and woods offer opportunities to make positive water use change whilst also contributing to other objectives in the LES – for further detail that could be referenced in the LES see the Woodland Trust publications Trees in our towns - the role of trees and woodland in managing water quality and quantity (Woodland Trust, 2012, www.woodlandtrust.org.uk/publications/2012/12/trees-in-our-towns/); Stemming the flow – the role of trees and woods in flood protection – (2014, www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/) and; Woodland actions for biodiversity and their role in water management (2008, www.woodlandtrust.org.uk/publications/2008/03/woodland-actions-for-biodiversity-and-their-role-in-water-management/)

To maximise the above benefits for London, the Mayor will need to agree action with local authorities outside London, further up river catchments. This principle of working across administrative boundaries is also vital for securing other ecosystem services for London, so collaborative ventures such as Green Arc should be investigated and re-invigorated.

5. Please provide any further comments on the policies and programmes mentioned in this chapter.

Whilst “New and emerging pests and diseases, and invasive non-native species” is noted as one of the top six climate change risks (and mentioned in the urban forest graphic), there are no corresponding objectives or proposals to counter this risk through biosecurity, appropriate procurement and continuing tree health monitoring. While the latter may currently be a focus of activity for the Forestry Commission, there is no guarantee this will continue, so the Mayor should clarify how he intends to address this risk. One topic is the selection of resilient planting, both through variety of tree species selected and procuring only “UK Sourced and Grown” trees for woodland creation.



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Ambient Noise

1. Are there any other actions you think the Mayor should be taking to work with the boroughs and other key stakeholders to reduce noise?

There should be a clear cross-reference to the Green Infrastructure chapter, where trees and wooded areas in the right places are proposed as natural solutions to many challenges. While tackling the source of noise is clearly the first priority, when dealing with the residual ambient noise natural solutions, especially street trees and hedges, should be given more priority than some single-issue technical fixes, because of their contribution to so many issues. As well as helping with reducing noise from roads, more street trees and hedges can contribute to reducing air pollution, surface water flooding; water quality; urban over-heating, and; increasing biodiversity.

2. Do you think that the boroughs and the Mayor have sufficient powers to manage noise across London? If not, what additional powers are required and which organisation should hold them?

No comment

3. Do you agree with the Mayor’s policies and proposals to improve Londoners’ awareness of the health risks of noise?

No comment

4. Please provide any further comments on the policies and programmes mentioned in this chapter.

No further comments



The Woodland Trust, Kempton Way, Grantham, Lincolnshire NG31 6LL.

woodlandtrust.org.uk

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