



The Woodland Trust
Grantham
Lincolnshire
NG31 6LL

Telephone
0343 770 5821
Email
richardbarnes@woodlandtrust.org.uk

30 June 2017

Peter Smith
Room 102
Hammersmith Town Hall
King Street
London W6 9JU

Dear Mr Smith

Woodland Trust response to the Biodiversity Commission for Hammersmith & Fulham's *Call for Evidence*.

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. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees. We own over 1,275 sites across UK covering over 23,580ha (from 0.06 to 4,875 ha), including 200 SSSIs, and we have 500,000 members and supporters.

Suggestions

The Trust is pleased to note the commitment to improving biodiversity in the borough. I have attempted to answer the questions in the letter from Morag Carmichael, and have concentrated on the role of trees and woodland.

1. What can be done to enhance the biodiversity of a densely populated urban environment such as Hammersmith & Fulham?

Firstly the existing biodiversity resource must be protected, both through robust local planning policies and by correct management. There are also threats to trees from pests (such as oak processionary moth) and diseases (such as acute oak decline), which have to be addressed.

One of the best ways to enhance biodiversity is by planting more trees (particularly native broad-leaved trees where possible). As well as improving biodiversity, there is now a wealth of evidence on the many other benefits of increasing tree canopy cover. These include improving: physical and mental health; air quality; water quality; water management (reducing flooding); shading; cooling through evapotranspiration;. Most of these issues are summarised, along with the appropriate references for the background research and evidence, in the Trust's publication *Residential Development and Trees*¹.

¹ www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/

2. What examples of good practice can we draw upon? (We are especially interested in examples of creating green corridors and of involving local people).

There is plenty of guidance on incorporation of trees on the Woodland Trust website www.woodlandtrust.org.uk/publications/ There is a drop-down menu of topics to refine your search, including planning guidance. I would draw your particular attention to *Trees of Turf?*² which shows it is often cheaper to maintain newly planted woodland than amenity grassland.

The Trees and Design Action Group (TDAG), noted in London Plan Policy 7.21, have recently published practical guide for the retention and planting of trees in urban situations, including new development: *Trees in the Hard Landscape*¹ (TDAG, September 2014).

The Royal borough of Greenwich produced a draft "*Greener Greenwich Strategy; The Council's response to a changing climate*"³ in 2016 which included a chapter on the natural environment. This had plans for improvement, and noted the role of local communities.

How best can we monitor improvements?

I would recommend regular biodiversity surveys. The basic habitat survey should be the responsibility of the borough, but local volunteers should be able to supplement this - I suggest you contact the London Wildlife Trust and London Natural History Society if you haven't already got contacts in the borough. With regards to canopy cover, there is emerging technology that can record this remotely, such as Bluesky, or Lidar. The London Tree Officers Association can advise on the most appropriate tools.

Where should responsibility lie for delivering such improvements?

The borough is in the best position to at least *lead* on delivery, and set a positive example. However, part of this would be through having robust planning policies that protect what is in the borough and promote development by others that enhances biodiversity. I understand the Local Plan is in the final stages of adoption, so it may be more useful for the borough to draft, consult upon and then adopt a Supplementary Planning Document (SPD) on biodiversity.

This could include reference to the Access to Nature principle in London Plan Policy 7.19. Section C of this policy states: "*Development Proposals should: ...b prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites*" Section F) directs borough LDFs to "*identify areas deficient in accessible wildlife sites and seek opportunities to address them*".

The *All London Green Grid* SPG (GLA, 2012)ⁱⁱ has further detail on mapping and addressing areas of deficiency, but the London Plan Implementation Report *Improving Londoners' Access to Nature* (GLA, February 2008)ⁱⁱⁱ is the definitive document on how areas of deficiency could be addressed.

The Trust has produced the Woodland Access Standard⁴, now adopted by the Forestry Commission, and has information at a London borough level of where deficiencies in access to woodland lie, which

² Woodland Trust, 2011 www.woodlandtrust.org.uk/publications/2011/05/trees-or-turf/

³ www.royalgreenwich.gov.uk/downloads/file/537/greener_greenwich_strategy

should help inform the creation of new wooded open spaces as part of your approach to reducing areas of deficiency.

On the topic of individual tree planting, Section 197 of the 1990 Planning Act requires planning authorities to include appropriate provision for planting of trees when granting planning permission:

“It shall be the duty of the local planning authority—

(a) to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees;“

The SPD should address the Access to Nature and Woodland Access Standards mentioned above, perhaps suggesting that “Any development within areas deficient in accessible wildlife sites and accessible woodland must contribute to addressing those deficiencies.”

Please get back to me if you have any queries on this, or require further clarification or detail on the role of trees and woodland in your borough.

Yours sincerely,

Richard Barnes MCIEEM, CBiol, MRSB

Senior Conservation Adviser, Government Affairs Officer - London

ⁱ www.tdag.org.uk/trees-in-hard-landscapes.html

ⁱⁱ www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/all-london-green-grid

ⁱⁱⁱ www.london.gov.uk/sites/default/files/uploads-access-to-nature.pdf

⁴ *Space for People* (Woodland Trust, 2017): www.woodlandtrust.org.uk/publications/2017/06/space-for-people-2017/