

City of London
Local Development Framework

**Tree Strategy
Supplementary Planning Document**

Statement of Consultation

January 2012



The Tree Strategy (SPD) forms part of the City of London Local Development Framework (LDF). It was published for public consultation during a six-week period from 10th October to 21st November 2011.

Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2004 (amended in 2008 and 2009) requires the City Corporation to prepare a statement setting out a summary of the main issues raised in the representations made by the public in response to the consultation and how these have been addressed in the adopted SPD.

Consultation on the Tree Strategy was carried out concurrently with five other SPDs. The following measures were taken to consult the public on the SPDs during the consultation period:

Website. The SPD, the SPD documents and a statement of the SPD matters were made available in the City Corporation's web site. Information and a link were provided on the home page of the City's website and on the landing page of the Planning section of the website to ensure maximum exposure. The Corporate Twitter account was used to 'tweet' the details of the consultation at the start of the consultation period. Information was provided in the City of London eshot.

Inspection copies. A copy of the SPD, the SPD documents and a statement of the SPD matters were made available at the Planning Information desk at the Guildhall and the Guildhall, City Business, Barbican and Shoe Lane public libraries.

Notifications. Letters and emails containing information about the SPD and inviting comments were sent to relevant specific and general consultation bodies. The City Corporation maintains a database of all those who have expressed an interest in the LDF, and letters or emails were also sent to all those on the list.

Local advertisement. A notice was placed in the Evening Standard which appeared on the first day of the consultation period, the 10th October 2011. An article about the SPDs was also placed in the 'City Resident' newsletter.

Meetings. Presentations on the SPDs were given to the following consultative groups: Conservation Area Advisory Committee; Planning Users Panel; Transport and Sustainability Forum; Safer City Partnership

Comments on the Tree Strategy were received from English Heritage, the Surveyor to the Fabric of St Paul's, Natural England, Waste Watch, NHS Healthy Urban Development, Thames Water, Theatre Trust, Highways Agency, Conservation Area Advisory Committee and Gemma Jamieson. The tables that follow summarise the comments and explain how they were addressed in finalising the SPD.

Summary of comments and responses

Section	Comment	Response
Gemma Jamieson		
	<p>Trees are essential to the City, they brighten up the surrounding buildings, giving another perspective to the streets and contribute to air quality. Has any thought been given to the tree planting in Silk Street, where new buildings are going up. A small avenue of trees like in Aldermanbury square, a place along the street - clipped Limes or Plain trees, a tub or trough added to give a bit of extra colour to the street. There may be other kinds of trees to plant in the streets, but care has to be taken re: maintenance, and root problems with the pavements or roads. Wouldn't it be an idea to get school children to plant a tree or trees somewhere near the school or their park or green space, and watch it grow up.</p>	<p>The importance of trees to the townscape is noted.</p> <p>The City routinely looks for opportunities for additional trees provision in association with new developments. Proposals for the Silk Street Enhancement Scheme will consider the opportunity to enhance the number of trees and, if agreed by Committee, will be implemented during 2012/13 planting season.</p> <p>Section 6.6 Community Involvement references the role of school children in planting and perhaps caring for trees in the City.</p>

	<p>Trees are nice to have in streets, but care must be taken where they are planted as roots can cause trouble to pavements and highways. Some colour looks nice against the buildings.</p>	<p>This comment has been noted and is considered to be covered under the City of London Corporation Owned and Managed Trees paragraphs 6.4.4-6.4.12 as well as in Part 2 of the Strategy which gives specific guidance on trees.</p>
Johnny Hazel, Waste Watch		

<p>2.1</p>	<p>These comments are informed by Waste Watch's community engagement work on three housing estates within the City of London (Golden Lane, Middlesex Street and the Aldgate Estate) and as such focus on Objective 11 from Part 2.1 of the strategy to promote greater resident involvement in fulfilling the aims of the strategy, as well as Objective 8 to increase the amenity value of the City's trees and Objective 9 to add to the City's biodiversity and climate change adaptation/mitigation interventions.</p> <p>Thanks to funding from the City of London's Transport and Sustainability forum, Waste Watch is currently working on a community engagement/energy saving project with the residents of three estates within the City of London, two of which (Golden Lane and Middlesex Street) are under City of London ownership. Through this work we have become aware of a strong interest amongst City residents to be involved in the planting of their estates and in opportunities to grow their own food (e.g. the allotment project on Golden Lane Estate). The City's Tree Strategy would therefore appear to provide an opportunity to meet this interest by planting fruit trees on the City's housing estates. To enable this, we would recommend The Open Spaces department liaises with Wendy Giaccaglia, Resident Involvement Manager in the Children and Community Services department whenever new tree planting work on the City's estates is being planned. She is well placed to work through the Residents Associations to ensure that residents are aware of the plans and can express an interest in being involved if they wish. If not already available, we would also recommend that the Open Spaces Department develops a database of the residents' gardening groups active on City of London housing estates and notifies these groups of any tree planting plans.</p>	<p>Part 2 of the Strategy now references the possible opportunity to plant fruit trees on City Estates under actions to be undertaken. A reference has also been included in paragraph 6.5.7 of the strategy which notes 'fruit trees may be considered suitable on residential estates where a maintenance and management plan is developed with the residents.</p>
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	<p>Beyond these communications-based recommendations, we also have the specific recommendation that the potential for planting fruit trees on the City's housing estates should be assessed, as fruit trees would contribute to Objective 8 of the strategy of planting trees that provide an amenity value. Beyond the obvious amenity of edible fruit, fruit trees would also contribute to the character of the city through their attractive blossom in the spring and by providing a focal point for community activities in the form of a summer/autumn harvest, perhaps organised in collaboration with estate gardening groups to avoid the nuisance factor of rotting fruit. More fruit trees would also support objective 9 of the strategy, to contribute to bio-diversity and offsetting climate change, by providing a source of local food that could be further used to raise residents' awareness of the environmental issues arising from food production and what a sustainable diet comprises.</p>	
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Martin Stancliffe, Surveyor to the Fabric of St Paul's Cathedral	
	<p>First of all, we very much welcome the intentions behind the Tree Strategy, and indeed the strategy itself, and we concur with nearly all of it. As a recorded in my earlier communication, the St Paul's Cathedral Conservation Plan of 2004, which was developed in conjunction with representatives from the Corporation of London, called for a tree strategy to be developed in connection with the trees in the vicinity of the cathedral, and in particular urged the cathedral to work with the City to develop such a strategy relating to the cathedral and its setting.</p> <p>In furtherance of this, we have recently carried out our own assessment of the East Churchyard, and have put our findings into a draft Heritage Statement. This includes an initial assessment of the trees in this part of the churchyard, as well as other elements of the setting. We discussed this at a recent meeting with Sue Ireland and Martin Rodman, and we have since sent a copy of this draft Statement to them, so that they can comment on it. We very much hope that once we have their comments, this might be amended to form the basis of an agreed document between the cathedral and the City which would form the basis for future decision making in this area.</p> <p>However, the preparation of these two documents (the Cathedral Conservation Plan and the East Churchyard Heritage Statement), both of which have involved a good deal of consultation, has drawn our attention to some issues which we feel are not sufficiently explored within your proposed Tree Strategy, as follows:</p> <ol style="list-style-type: none"> 1. The St Paul's Cathedral Conservation Plan draws attention to the fact that a number of mature trees obscure views of the Grade I listed building, and detract from its appreciation as one of the most important and best loved buildings in the country. The Plan calls for the development of the tree strategy referred to above in order to provide a framework for decision making about the future of trees in the churchyard to address this.
	<p>Section 3 currently lists the limitations to planting in the City. This comment related to townscape settings and views was also noted by English Heritage. Therefore paragraphs 3.5.8 and 3.5.9 have been included which look at the setting and views of heritage assets and the impact trees may have on these elements.</p>

	<p>2. Arising from this, we consider that there is one essential missing element within your Tree Strategy. The urban landscape is composed of both buildings and trees. Your document notes (5.1.11) the definition of a conservation area as “an area of special architectural interest, the character or appearance of which it is desirable to preserve or enhance” (my emphasis). Consequently at least in conservation areas (and perhaps especially in the case of Grade I listed buildings in conservation areas) the contribution that trees may bring to their setting needs to be properly assessed. To address this we consider that the significance of trees and buildings should be evaluated in relation to one another. We can find no reference in the document to any mechanism for such an assessment, or even for the need for it, and we urge that this is addressed</p>	<p>It is hoped that paragraphs 3.5.8 and 3.5.9 address this issue.</p>
	<p>3. In connection with this, we note that the tree survey that has been carried out as the basis for your proposals does not appear to contain any assessment of the significance of any individual tree. In particular, there seems to be no acknowledgement that some trees may possibly in some instances be neutral or even detract from the amenity of the urban landscape. We believe that there should be some such assessment to form the basis for future decision making.</p>	<p>Currently the Tree Survey is used as a tree health and counting tool and does not assess the townscape significance or value. Where trees are of significant value this will be noted in the Conservation Area Character Studies and Management Strategies, there are currently no resources to provide tree townscape assessments for the City, although this may be possible in the longer term.</p>

4.1.8	<p>4. We note the document's reference (4.1.8) to the concept of "the right tree in the right place" contained in the London Plan (Policy 7.21). But this refers only to the planting of new trees: there appears to be no mechanism for establishing whether the right existing trees are in the right existing places. Is the churchyard of St Paul's the right place for a tree known as "The Devil's Walking Stick" for instance!</p> <p>We would like to emphasise that we are very supportive of the maintenance and future planting of trees; but we do believe that the area around St Paul's could benefit from some reassessment, not least because we feel that some thought should be given to the outcome – inevitable at some point in the future – following the loss of any or all of the major plane trees in the churchyard. We want to ensure that your Tree Strategy allows for such a reassessment.</p>	<p>Where trees are of significant value this will be noted in the Conservation Area Character Studies and Management Strategies. It will also look at the important townscape characteristics of conservation areas such as St Paul's Cathedral.</p>
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	<p>My particular concern here is the proposed Tree Strategy. The St Paul's Cathedral Conservation Plan (developed in 2004 in consultation with the City) calls on the cathedral to work with the City to develop a tree strategy relating to the cathedral and its setting. Although I have raised this on a number of occasions over the past few years, this is the first response that we have received from the City. Accordingly we warmly welcome the opportunity to establish a basis for developing such a strategy which can then be incorporated within the City's Tree Strategy.</p> <p>As a starting point we would like to ensure that an initial discussion takes place on the role of trees relative to the cathedral itself. This should take into account the architecture of Wren's cathedral as well as the existing trees themselves. I note that in your draft document there is reference to a tree survey, but not, as far as I can see at the moment, to an evaluation of the role and significance played by individual trees; and I think that there are some (perhaps not many) where this should be established at an initial stage of developing the strategy. We support, and are keen to develop, the planting of more trees; but we note that whereas there are some paragraphs which address the damage, or potential damage, to below ground archaeology, there is no corresponding reference to assessment of damage, or potential damage, to the architectural setting of significant buildings such as St Paul's. In the initial draft there is a clear presumption in favour of the retention of existing trees: we want to be able to support this, but before this process starts there needs to be an evaluation of the role some trees play in their contribution to their architectural setting.</p>	A section has been included under 3.5 Limitations to planting which will hopefully address these concerns.
	We also believe that it will be important to work out a policy whereby existing large and mature trees can be replaced over time.	This will be undertaken through the relevant conservation area strategies and management plans.
3.5.8, 3.5.9	I have now looked at your proposed paragraphs 3.5.8 and 3.5.9, and am happy to confirm that these meet my points of concern.	No response required.

Natural England		
	<p>Tree Strategy</p> <p>We would like to see a more ambitious target than an increase of 5% in the number of Corporation owned trees by 2019. Although we appreciate the limitations of the built environment of the city limiting the objective to around 8 trees a year seems a little restrictive. There could be opportunities within the major infrastructure projects underway eg Crossrail to deliver more than this.</p> <p>In any account we would like to see trees on the London River Park specifically excluded as this proposal is temporary in itself. Where possible we would encourage use of TPO to protect the City's trees which are a scarce resource in this heavily urban area.</p> <p>We are pleased to see the benefits of trees to human health, economically and the important cultural connections expressed in Section 4.</p> <p>We are happy with the SEA assessment that implementation of the Tree strategy will be of positive environmental benefit.</p>	<p>The target of 5% is given further clarification in paragraph 5.2. This illustrates the current limitations to planting. The target is considered to be a minimum target and if at all possible the City will seek to exceed this target, however with the uncertainty of underground infrastructure and archaeology it is considered a suitable target.</p>
	<p>Right Trees for a Changing Climate</p> <p>http://www.right-trees.org.uk/</p>	<p>This web site does not appear to be working properly.</p> <p>A reference to the RHS web site has been included in the strategy instead - paragraph 6.5.16. This includes information on suitable trees for a changing climate.</p>
Will Anderson, NHS Healthy Urban Development Unit		

	incorporating trees to buffer noise and absorb pollution;	A reference to the ability of trees to mitigate against noise has been included paragraph 3.4.1. A reference to the Noise Strategy will be incorporated once this is adopted. Due to timing this may have to be upon review/update of the Tree Strategy.
Carmelle Bell, Thames Water		
3.5.1	<p>Thank you for consulting Thames Water Utilities Ltd. (TWUL) on the above. TWUL is the statutory sewerage undertaker and statutory water undertaker for City of London and the following comments are made in this respect.</p> <p>We support the Draft City of London Tree Strategy and in particular the inclusion of paragraph 3.5.1 is strongly supported. We support the objective of providing enhancements to biodiversity, including the planting of trees. It should be noted however that the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system. In order for public sewers to operate satisfactorily, trees and shrubs should not be planted over the route of existing sewers. The recognition (within paragraph 3.5.1) that consultation with utility providers is essential in determining the location of trees is helpful and should contribute to the prevention of damage to underground infrastructure networks.</p>	A further reference has been included in paragraph 3.5.1 to the importance of sewerage infrastructure.
City of London Conservation Area Advisory Committee		

	<p>The Officers reminded the Committee that the consultation period for the Supplementary Planning Documents (Bank, Charterhouse Square, Crescent, Lloyd's Avenue Conservation Areas, Protected Views, Tree Strategy) was due to end on 21st November and encouraged Committee Members to submit comments. The Committee congratulated the Officers on the quality and clarity of the documents and considered that they were very well presented and interesting, informative documents.</p>	Support welcomed
<p>Nick Bishop, English Heritage</p>		
p.30	<p>Page 30, New Trees and Tree Planting - Townscape. We welcome the note of caution provided in this paragraph regarding the need to consider historic character and significance when deciding whether to plant new trees. In order to determine what level of tree planting is appropriate, the impacts of greening on historic significance should be judged in line with Planning Policy Statement 5: Planning for the Historic Environment (PPS5) (2010). This point could usefully be made in the second paragraph. In addition, the paragraph could be further strengthened by replacing "historic assets" with "heritage assets" in accurate reflection of PPS5, and with a specific mention of conservation areas, which are particularly sensitive to impacts on historic character.</p>	<p>Planning Policy Statement 5 has been replaced by the National Planning Policy framework.</p> <p>The Strategy has been amended by the addition of reference to heritage assets paragraph 6.5.2. A reference to the National Planning Policy Framework is included in paragraph 6.5.3 and in Section 4.</p>
Section 5.5 New Trees	<p>A guiding principle should be that the group that will ultimately have responsibility for the upkeep, maintenance and liability for the tree should also contribute to planning tree planting and selecting species.</p>	<p>A sentence has been included under Planting and Maintenance paragraph 6.5.18 which addresses the issue of upkeep and maintenance and initial inclusion in decision making.</p>

Page 14, paragraph 4.1.5	Protected valued landscapes only refers to green infrastructure and should be expanded to include the historic environment.	This is a reference to the draft NPPF. References to the NPPF have been updated and a link added. Specific references have been made to sections 11 Conserving and enhancing the natural environment and 12 Conserving and enhancing the historic environment. Paragraph 4.1.4.
Page 9, Para 3.1 Climate Change	The statement on species which are able to withstand changed climatic conditions could usefully cross refer to the spread of pathogens not usually found in the UK that have been introduced and are flourishing due to more favourable conditions associated with climate change. The tree strategy should acknowledge the need to take appropriate measures in good time to limit the scale of any outbreaks. The effect of disease on tree stock will also need to be addressed within a coordinated national effort	A note has been made of pathogen survival in paragraph 3.1.7
Page 9, paragraph 3.5	EH welcomes the need to preserve archaeological remains. This section should be expanded to include heritage assets; the emphasis in paragraphs 3.5.3 to 3.5.5 is on below ground considerations. This should be expanded to encompass the wider historic environment, protected views, designed views in registered parks and gardens and the setting of listed buildings. A useful link would be made to section 5.	A new section has been incorporated under 3.5 Limitations to planting. This will address views and settings.
Section 1 Trees in the City of London Page 3, paragraph 1.1.4	It would be useful to understand the basis of the aim to increase the number of trees by 5% by 2019. Is this simply in line with the Mayor's strategy, Action 19 Is the intention to achieve a gradual increase in tree numbers and if so what levels of replacement planting is anticipated. Page 6 paragraph 2.1 states that there are approximately 2411 trees in the City. Thus a 5% increase equates to 120 new trees by 2019, or an average of say 13 trees per year, an apparently modest figure.	An explanation has been included on how the aim and particularly the target of the tree strategy was created paragraph 5.2. This outlines how many trees the City aims to plant by 2019, taking into account tree felling.
P.4, para 1.3.2	EH would wish to see the statement 'links to history' strengthened and it should be made clear that trees are an integral part the historic environment. The role of commemorative trees in the City of London should be mentioned and a link made to the section on this under 5.6 Community Involvement, page 30.	See below for clarification of comment

<p>p.21, para 5.1.16</p> <p>p.30 para 5.5.2</p>	<p>This document will reinforce the intrinsic role that care and planting of trees must have in the Local Development Framework. English Heritage (EH) welcomes the specific consideration of trees within registered parks and gardens on page 21, paragraph 5.1.16. The introductory section on the history of trees in the City is a useful summary of the close relationship of trees and the evolving city. In this regard we would emphasise that in some historic environments tree planting may not be appropriate and support Paragraph 5.5.2 stating that trees may not be characteristic of some areas. We welcome the emphasis on the selection of species and that tree species must be appropriate to the character of the area. We note that the City of London is characterised by a large number of small parks, gardens and churchyards; a single tree can make a significant contribution and in small spaces it is particularly important to care for existing trees and select the appropriate species and location for any new tree planting. When selecting tree species for new planting there will also be a need to consider the character of areas that fringe the City of London, particularly in the cases of tree avenues</p>	<p>The City of London will comply with the Right Tree Right Place guidance which also considers the historic aspect and character of an area. A reference has been included paragraph 6.5.12 as below: 'It is recommended that the species is in character with the City of London and where relevant, with areas that fringe the City as well as other high quality planting in the area and its surroundings. '</p>
<p>p.4, para 1.3.2</p> <p>p.6 para 2.1.2</p>	<p>Clarification of previous comment In answer to your question, paragraph 1.3.2 refers to the City of London Commemorative trees as detailed in paragraph 2.1.2. But through our representation on the section 'Why are Trees important', we wished to emphasise more generally the broad range of historic values which can be embodied in trees. They can have historic significance as part of designated historic landscapes, for example, as contributors to the historic character and appearance of conservation areas, or in providing historic evidence for earlier land use and activity at a site. In addition, commemorative trees are worth mentioning in particular as they have direct associational value with people or historic events.</p>	<p>Paragraph 1.3.2 has been expanded upon to address this issue. This is also currently expanded on under the townscape consideration of trees in Part 1 paragraphs 6.5.1-6.5.3. A link is included under Section 6.6 to Commemorative trees paragraph 2.1.2.</p>
<p>Rose Freeman, Theatres Trust</p>		
	<p>Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres so these SPDs are not relevant to our remit and we therefore have no comments to make on this occasion.</p>	<p>No response required.</p>
<p>Patrick Blake, Highways Agency</p>		

	<p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's Strategic Road Network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, we do not manage any roads within the City of London.</p> <p>We have reviewed the SPD consultations and do not have any comment at this time.</p>	No response required.
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