

Schedule of Changes to Tree Strategy SPD Part 1, April 2012

Page (Cons. Version)	Section	Policy/ Paragraph (new reference)	Proposed Change	Reason for change
	Throughout Strategy		<ul style="list-style-type: none"> ▪ Changes to reflect the introduction of the National Planning Policy Framework (NPPF) on the 27 March 2012 ▪ Removal of references to documents replaced by the framework ▪ Changes to reflect the introduction of the Town and Country Planning (Tree Preservation) (England) Regulations 2012 which came into force on the 6 April 2012. ▪ Department name updated 	
1			Reconfiguration of contents page	
2	The Role of the Tree Strategy		<p>The Strategy comprises two major sections</p> <ol style="list-style-type: none"> 1. Policy framework – Strategy and objectives. 2. Evidence and Practical Guidance – Evidence which <u>This</u> supports the strategy and provides more detailed information. <p>Part I of the Tree Strategy is a Supplementary Planning Document (SPD) of the Local Development Framework. This means that additional weight will be given to it when considering planning applications, the creation of Tree Preservation Orders, section 211 notices and any <u>other works to trees in the City. Part 2 of the document provides additional detailed guidance and information on the implementation of the SPD.</u></p>	Explanation for Tree Strategy format reconfigured

3/17	1. Trees in the City of London 1.1 City of London 5.The Tree Strategy and Objectives Tree Strategy Aim	1.1.4 5.1	The City of London Tree Strategy aims to increase the number of Corporation owned trees by 5% by 2019 and ensure that all trees within the City are managed, preserved and planted in accordance with sound arboricultural practices whilst taking account of their contribution to amenity and the urban landscape for both current and future generations.	Tree Strategy Aim reconfigured
4	1. Trees in the City of London 1.3 Importance of Trees	1.3.2	Trees in the City provide a number of social, environmental and economic benefits:— <u>and are an integral part of the historic environment.</u> Social benefits include: <ul style="list-style-type: none"> • Amenity / aesthetic – links to history as well as a role in the present townscape, providing structure and orientation, <u>as part of designated historic landscapes, as contributors to the historic character and appearance of conservation areas, or in providing historic evidence for earlier land use and activity.</u> 	Response to English Heritage
5	1.3 Importance of Trees	1.3.2	More detailed information about the importance of trees is given <u>in paragraph 2.1.2 Part 1 and in Part 2</u>	Response to English Heritage
6	2. City Tree Survey		<u>Although there is not a clear legal definition of what constitutes a tree, the City of London will seek to apply the High Court definition above throughout this document and for the methodology of the Tree Survey.</u>	Legal definition revised

6	2.1 Tree Distribution	2.1.1-2.1.2	<p>There are approximately 2411 2,413 trees in the City. <u>The number is approximate as some trees may not have been Included where access was not possible.</u> These trees can be found in a variety of locations; along streets,</p> <p>Across the City there are 141 commemorative trees. These have been planted in memory of someone prominent in, or having an important association with, the City of London. They <u>often</u> have historical and emotional relevance Some have been planted by others for example and some trees have been planted by <u>important people, notably</u> the late Queen Mother.</p>	<p>Tree Survey data updated Explanation for reference to approximate number of trees</p> <p>Comment strengthened</p>
7	2.3 Ownership and responsibility	2.3.1	<p>The City Corporation owns and/or manages over half the trees in the City of London i.e. approximately 1305 1307 trees. The remaining trees, approximately 1106 are in private Ownership last surveyed 2004.</p>	<p>Tree Survey data updated</p>
9	<p>3. Strategic Opportunities and Challenges for Tree Management in the City of London</p> <p>3.1 Climate Change</p>	3.1.7	<p>‘The right tree in the right place’ is crucial to ensuring that trees of appropriate species (which are able to withstand changed climatic conditions) are planted. <u>These species should be able to withstand changed climatic conditions and resist the changing pathogens that may flourish in more favourable weather conditions.</u></p> <p>http://www.london.gov.uk/sites/default/files/Adaptation-oct11.pdf http://www.cityoflondon.gov.uk/Corporation/LGN_L_Services/Environment_and_planning/Sustainability/Climate_change/</p>	<p>Response to English Heritage</p>

10	3.2 Air Quality	3.2.1 – 3.2.3	<p>The City, along with the whole of London, has been declared an Air Quality Management Area as the air quality fails to meet EU target levels for nitrogen dioxide and fine particles. Action must be taken to reduce levels of both pollutants. <u>The Mayor has an Air Quality Strategy to improve air quality in London.</u></p> <p>Road transport is the main cause of emissions of oxides of nitrogen and high concentrations of NO₂ (nitrogen dioxide, one of these oxides). Trees also have a role to play as they affect air quality both directly and indirectly. <u>Victoria Embankment, Upper Thames Street, Lower Thames Street and Tower Hill</u> have been identified as priority areas, these roads are controlled and managed by Transport for London.</p> <p><u>Trees can have an effect on air quality. They can absorb gaseous pollutants like nitrogen dioxide through the leaves, and particulate matter can stick to leaves to be washed away when it rains. However, some species emit volatile organic compounds which combine with oxides of nitrogen to create other pollutants, particularly ozone.</u></p> <p>Mayors Air Quality Strategy: http://www.london.gov.uk/publication/mayors-air-quality-strategy</p> <p>City of London Air Quality Strategy http://www.cityoflondon.gov.uk/Corporation/LGN_L_Services/Environment_and_planning/Pollution/air+quality.htm</p> <p><u>Table 2: Effects of Air Quality - Deleted</u></p>	Rewritten following updated advice
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10	3.3 Biodiversity	3.3.1	<p>Biodiversity describes the 'variety of life', or the range of plants, animals and habitats that exist in a given area.</p> <p>The City of London is committed to protecting the diversity of nature and in particular the three identified habitats action plans which are relevant to the Square Mile in the City's Biodiversity Action Plan.</p>	Reworded
11	3.4 Open Spaces in the City	3.4.1	<p>Many of the trees within the City of London are located within small open spaces, churchyards and other public amenity areas. Therefore this tree strategy should be read in conjunction with the City of London Open Spaces Strategy 2008 as there are linked objectives with regard to green infrastructure. <u>Trees also provide an opportunity to mitigate against noise in a very dense and busy environments.</u></p>	Response to NHS Healthy Urban Development Unit
11	3.5 Limitations to planting Sub-surface infrastructure	3.5.1	<p>The roads and pavements in the City are densely populated by many utility operators' distribution cabling, pipe work, plant and equipment. <u>Tree roots can be particularly damaging to the public sewerage system and the City Corporation tries to follows the guidance on tree planting distances from sewers set out in <i>Sewers for Adoption (6th Addition)</i>.</u> This has led to significant limitations to tree planting and will be a major consideration in determining appropriate locations for trees. Consultation with utility providers is essential (The City developer guidelines for incoming utility services also refers to this conflict).</p>	Response to Thames Water

12	3.5 Limitations to planting Views and Settings of Heritage Assets	3.5.8 – 3.5.9	<p><u>The location of trees or the potential loss of trees in the townscape may have an impact on the setting and views of heritage assets, for example St Paul’s Cathedral and Mansion House. It is important that this issue is considered and that significant harm is not caused to the setting of heritage assets. Trees may obscure or affect views of heritage assets, and aspects such as growth potential, seasonal variation, including leaf loss should be considered.</u></p> <p><u>Trees should be managed to ensure they enhance, and do not obscure, heritage assets in identified views. More information can be found in the City of London Protected Views SPD and Conservation Area Character Summary SPDs)</u></p> <p>See also:</p> <p>Seeing the History in the View , <i>English Heritage, 2011</i> http://www.english-heritage.org.uk/publications/seeing-history-view/</p> <p>The Setting of heritage assets, English Heritage 2011 http://www.english-heritage.org.uk/publications/setting-heritage-assets/</p>	Response to English Heritage/Surveyor to the Fabric of St Paul’s Cathedral
13-18			Section 4. Objectives now divided into 2 sections: 4. Policy Framework 5. The Tree Strategy and Objectives	For ease of reference

13-16	4. Policy Framework	4.1 – 4.3.9	Reference to NPPF reconfigured and policy framework updated Reference to the Mayor of London’s preparation of tree and woodland guidance Minor amendments to wording of polices	Response to new policy, guidance and Mayor of London consultation Response to English Heritage
17	5. The Tree Strategy and Objectives Tree Strategy Aim	5.2	The Tree Strategy Objectives have been developed within the Policy context set by national and regional policy and the Core Strategy <u>The Tree Strategy aim has been formulated taking into account the Mayor’s target to increase tree cover, as well as the current constraints to tree planting in the City of London identified in Section 3.5. Using the 2010 baseline of 1307 Corporation owned trees this equates to a total of 65 trees, this is a net figure which takes into account likely tree felling.</u>	Response to Natural England/English Heritage
20	6. Achieving the Objectives 6.1 How the City Corporation Protects Trees Conservation Areas	6.1.11	The statutory definition of a conservation area is “an area of special architectural <u>or historic</u> interest, the character or appearance of which it is desirable to preserve or enhance”. <u>Existing trees which make a positive contribution to the character of a conservation area and which provide a setting for the City's architectural heritage will be preserved.</u>	Comment strengthened

24	6.2 Development and Trees	6.2.2	<p>In determining applications for development the City Corporation is required to have regard to the Development Plan (i.e. The London Plan, the LDF and the Unitary Development Plan) so far as material, and to any other material considerations. <u>the Core Strategy DPD (Adopted September 2011) and saved polices of the Unitary Development Plan 2002.</u> Applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The Local Development Framework is currently a material consideration but will be adopted as the Development Plan shortly. The effect of proposed development on trees is a material consideration when determining planning applications.</p>	Reference to the development plan reworded
28	6.4 Management of Existing Trees City of London Corporation Owned and Managed Trees	6.4.4	<p>(1) Maintenance of City of London Corporation Trees There are approximately 1305 1307 trees owned or managed by the City Corporation. The City Corporation is required to maintain its own trees, along with those it manages on behalf of others, in a safe condition having regard to public safety. Trees along GLA roads are the responsibility of Transport for London, as the highway authority for these roads.</p>	Tree survey data revised
29	6.4 Management of Existing Trees City of London Corporation Owned and Managed Trees	6.4.6	<p>The Open Spaces Department is however required to submit applications under the relevant TPOs to carry out works to trees it owns and manages. Of the nine TPOs in place, four are owned or managed by the City, covering twenty three trees. <u>four cover a total of 24 trees owned or managed by the City.</u></p>	Data updated

31	6.5 New Trees and Tree Planting Townscape	6.5.2	The City derives its character from its historic and built landscape. There is a rich network of paving materials and the urban nature of the townscape is often the main characteristic of the area. It provides a setting to <u>heritage</u> assets such as nationally and locally important buildings and monuments or reveals a network of streets and alleyways.	Response to English Heritage
31	6.5 New Trees and Tree Planting Townscape	6.5.3	Practical Guidance on tree planting can be found in Part 2 <u>and further national guidance given in the National Planning Policy Framework.</u>	Response to English Heritage
31	6.5 New Trees and Tree Planting Different Settings- open spaces, streets and residential estates	6.5.7	In residential estates trees may play an even more important role in improving the environment for the occupants. Where there is development on estates the type of tree and location and use should be considered for example for use by children to play near and for adults to sit under and read. <u>Fruit trees may also be considered suitable on residential estates where a maintenance and management plan is developed with the residents.</u> There should be a process of consultation with the developer and the local community.	Response to Waste Watch
32	6.5 New Trees and Tree Planting Species <u>Selection</u>	6.5.12	It is essential that the right species of tree is selected for a particular site and environment. It is recommended that the species is in character with <u>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.</u>	Response to English Heritage Grammatical change
33	6.5 New Trees and Tree Planting Species <u>Selection</u>	6.5.16	The selection of trees should be undertaken using the guidance below: http://www.right-trees.org.uk/	Response to Natural England

33	6.5 New Trees and Tree Planting Planting and Maintenance	6.5.18	<u>It is important that there is consideration of species type at the species selection stage with the relevant authority responsible for the maintenance, management and upkeep of the new tree or group of trees.</u>	Response to English Heritage
34	6.6 Community Involvement	-	<p><u>Paragraph 2.1.2 Part 1 of the strategy details the importance of commemorative trees.</u></p> <p>Link added to 2.1.2</p>	Response to English Heritage