



City of London | Supplementary Planning Document

Tree Strategy

Part 1



City of London | Local Development Framework

Tree Strategy

Supplementary Planning Document

Adopted 15th May 2012

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CONTENTS

Part I: Policy framework

The Role of the Tree Strategy	4
1. Trees in the City of London	5
1.1 City of London	5
1.2 History of Trees in the City	5
1.3 Importance of Trees	6
2. City Trees Survey	7
2.1 Tree Distribution	7
2.2 Current Tree Stock	8
2.3 Ownership and Responsibility	9
3. Strategic Opportunities and Challenges for Tree Management in the City of London	10
3.1 Climate Change	10
3.2 Air Quality	10
3.3 Biodiversity	11
3.4 Open Spaces in the City	12
3.5 Limitations to Planting	12
4. Policy Framework	14
4.1 National Policy and Standards	14
4.2 Regional Framework	15
4.3 City of London Framework	16
5. The Tree Strategy and Objectives	18
6. Achieving the Objectives	20
6.1 How the City Corporation Protects Trees	20
6.2 Development and Trees	25
6.3 Highways and Trees	26
6.4 Management of Existing Trees	27
6.5 New Trees and Tree Planting	30
6.6 Community Involvement	33

The Role of the Tree Strategy

The Tree Strategy seeks to provide a co-ordinated approach to the management of trees in the City of London.

The Strategy comprises two sections

1. Policy framework – Strategy and objectives.
2. Evidence and Practical Guidance – This supports the strategy and provides more detailed information.

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 other works to trees in the City. Part 2 of the document provides additional detailed guidance and information on the implementation of the SPD.

The Tree Strategy as a whole provides advice for all who may wish to undertake work to existing trees or to plant new trees.

The role of the Tree Strategy is to:

1. Confirm the strategy and policies relevant to the City of London.
2. Aid the handling of Planning applications, TPO Applications and Section 211 notices.
3. Assist the arboricultural management of trees in the City of London; those in parks and gardens and on City streets.
4. Provide advice on trees in the City.



1. Trees in the City of London

1.1 City of London

- 1.1.1 The City of London or 'Square Mile' as it is known, is the historic core from which the modern city developed and is the heart of London's international financial and business centre. It is a unique place with distinct environmental, social and economic characteristics. It is home to approximately 10,000 residents, provides employment for over 370,000 workers and attracts over four million visitors each year.
- 1.1.2 Whilst internationally renowned for both its heritage and contemporary urban character, the City of London is perhaps less well known for its open spaces and trees. With approximately 200 small parks and gardens, churchyards and landscaped areas in the Square Mile, the City's trees enhance the environment in which to live and work.
- 1.1.3 Trees are an integral part of the City's unique history and an important asset. It is essential that the existing tree stock is managed and preserved effectively and that new trees are planted having regard to their contribution to amenity and the urban landscape with a view to maintaining and enhancing this asset.
- 1.1.4 This is reiterated by the Mayor of London's London Tree and Woodland Framework:

"Trees and woodlands are an essential part of London's character and identity. They help to breathe life into the capital, providing a welcome respite from the hustle and bustle of everyday life. They tell us of the seasons, and bring us into contact with nature. They remind us that where London now stands, a vast and ancient forest once existed. They provide shade on hot days, help to relieve us from stress and help clean our polluted air. Trees and woodlands are good for Londoners, good for visitors to London, and good for business in London".

<http://legacy.london.gov.uk/mayor/environment/forest/index.jsp>

The City of London Tree Strategy aims to increase City 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.

1.2 History of Trees in the City

- 1.2.1 The townscape of the City has evolved throughout history. The beginnings of the present pattern of open spaces, often containing trees, can be traced back to the Roman and medieval periods. Trees were planted in churchyards in the 13th Century and when the Livery companies built their halls in the 15th and 16th Centuries they often included gardens (for example Grocers, Carpenters, Drapers, Masons and Girdlers)
- 1.2.2 During the 17th and 18th Centuries, some areas were open and used solely for public recreation. Moorfields was the last great area of open land left in the City and its immediate fringes and was laid out as a public garden as far back as 1605.
- 1.2.3 Commercial building pressures increased in the 19th and early 20th Centuries. There was a large increase in the City's daytime population but a large reduction in the residential population which halved between 1921 and 2001. The

residential population of the City is forecast to increase by about 25% over the next fifteen years (9700 today to 12,100 in 2026).

- 1.2.4 Street trees are a comparatively recent introduction to the urban realm in the City and many have been planted in City streets since the 1950s.
- 1.2.5 In the 21st Century trees play an important role in enhancing amenity within a high density environment, whether they are to be found in open spaces, on City streets or in private gardens.

1.3 Importance of Trees

1.3.1 Trees are a key part of green infrastructure. This is defined (Natural England), as: "A strategically planned and managed network of green spaces and other environmental features vital to the sustainability of any urban area." This includes (although not exclusively) trees, green roofs and walls and green corridors.

1.3.2 Trees in the City provide a number of social, environmental and economic benefits and are an integral part of the historic environment:

Social benefits include:

- Amenity / aesthetic – links to history as well as a role in the present townscape, providing structure and orientation, 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
- Shelter from rain and sun
- Physiological and psychological health improvement

Environmental benefits include:

- Urban cooling – reduction of urban heat island effect
- Improvement in air quality
- Maintenance and enhancement of biodiversity
- Drainage – reducing run-off and helping to prevent flooding

Economic benefits include:

- Increased land and property values - mature trees add value to development sites
- Encouragement of investment due to improved area
- Cheaper maintenance costs than grassland or other green spaces

More detailed information about the importance of trees, is given in paragraph 2.1.2 Part 1 and in Part 2



2. City Tree Survey

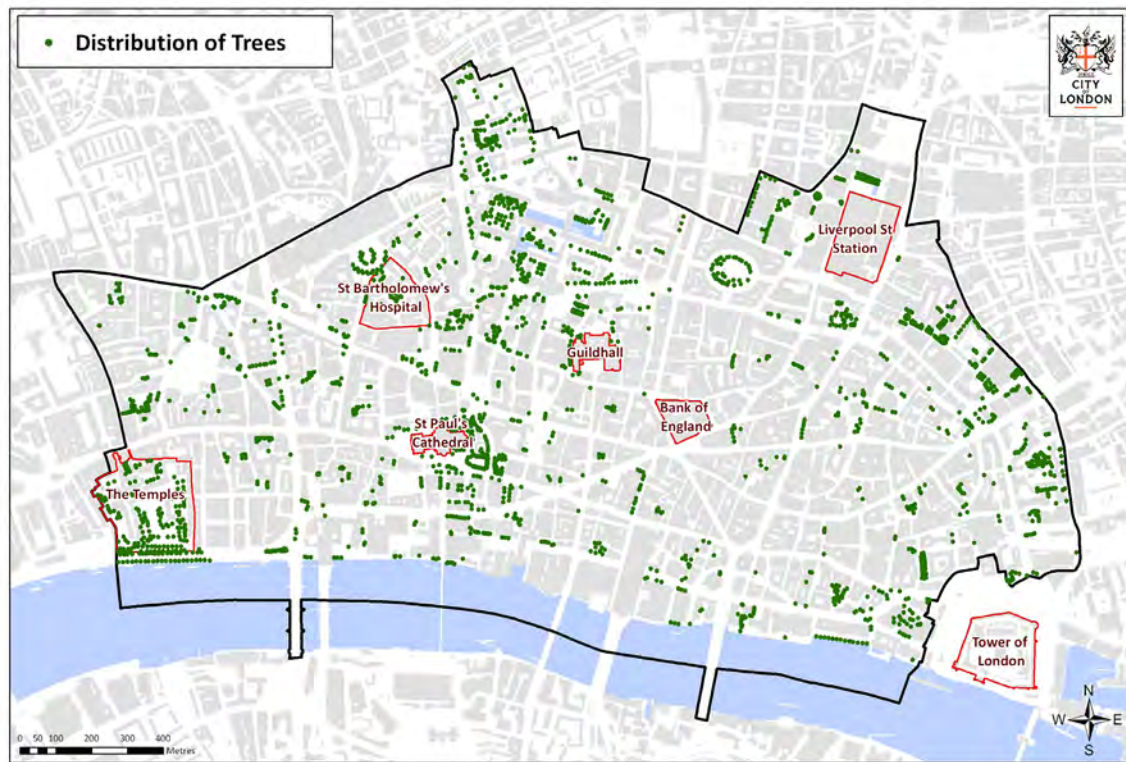
'Tree' is not defined in the Town and Country Planning (Trees Preservation) (England) Regulations 2012 nor in the Town and Country Planning Act 1990.

The Act does not limit the application of Tree Preservation Orders (TPOs) to trees of a minimum size. For the purposes of the TPO legislation, the High Court has held that a 'tree' is anything which ordinarily one would call a tree. (*Bullock v Secretary of State for the Environment* (1980) 40 P&CR 246)

Although there is not a statutory definition of what constitutes a tree, the City Corporation will seek to apply the High Court definition above throughout this document and for the methodology of the Tree Survey.

2.1 Tree Distribution

2.1.1 There are approximately 2,413 trees in the City. The number is approximate as some trees may not have been included where access was not possible. These trees can be found in a variety of locations; along streets, in open spaces such as churchyards and disused burial grounds as well as Livery company gardens, residential estates, business premises, historic parks and gardens and along the riverside.



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Figure 1: Distribution of trees across the City
 Source: City of London Tree Survey data, 30 June 2010

2.1.2 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 Corporation. They often have historical and emotional relevance and some trees have been planted by important people, notably the late Queen Mother.

2.1.3 The majority of City trees (62%) are in gardens rather than along the streets. Of the latter most are growing within a paved area rather than in a grassy area or bed.

	City Corporation Trees		Private Trees		Total
	Standard (no plaque)	Commemorative (with plaque)	Private	TFL	%
Gardens	759	69	668	0	62
Street Trees/ Highway	407	72	316	122	38
Total	1166	141	984	122	100

Table 1: Location of Trees in the City of London

Source: City of London Tree Survey data 30 June 2010

2.2 Current Tree Stock

2.2.1 Whilst there are approximately seventy different genera present, six of these account for about half of all the City trees. These are Platanus (Plane), Tilia (Lime), Prunus (Cherry), Acer (Maple), Carpinus (Hornbeam) and Betula (Birch). One in seven of all trees is a London Plane (mostly Platanus x hispanica).



2.2.2 The City has a similar proportion of mature or semi-mature trees to other urban areas in the UK.

Part 2 contains more detail on the current tree stock.

2.3 Ownership and Responsibility

- 2.3.1 The City Corporation owns and/or manages over half the trees in the City of London i.e. approximately 1307 trees. The remaining trees, approximately 1106 are in private ownership and were last surveyed in 2004.
- 2.3.2 As a Local planning authority it exercises control over works to privately owned trees in conservation areas (See Part 1 section 6 for details of conservation areas).
- 2.3.3 Further control is exercised by the use of Tree Preservation Orders, attaching conditions to planning permissions and negotiating Section 106 agreements and or unilateral undertakings. (See Part 1 section 6 for details of Tree Preservation Orders.)
- 2.3.4 **The Open Spaces Department** manages trees which are in the City Corporation's ownership or where maintenance agreements have been entered into. The majority of street trees in the City are managed by this Department.
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Parks_and_open_spaces/about.htm
- 2.3.5 **The Department of the Built Environment (Planning)** manages the delivery of enhanced streets and spaces and the creation of additional 'spaces' which may include tree planting. This is done in partnership with businesses, developers and other agencies.
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning/contact_num.htm
- 2.3.6 **The Department of the Built Environment (Environmental Services)** for the City Corporation has powers to deal with trees overhanging the highway.
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/
- 2.3.7 **Trees on TfL roads** are the responsibility of Transport for London (TfL) as the highway authority for those roads. (These are listed under private trees).
<http://www.tfl.gov.uk/>

3. Strategic Opportunities and Challenges for Tree Management in the City of London

Strategies for dealing with climate change, air quality and bio-diversity are ongoing and the presence of trees is an important element of these. However, retaining existing trees and planting new trees in the City brings particular challenges. These include the need to respect and preserve archaeological remains and buildings and the difficulties of finding suitable planting sites, given the presence of large amounts of below-ground services.

3.1 Climate Change

- 3.1.1 Climate change means in the future London will have hotter drier summers and warmer, wetter winters, with the capital at increased risk of floods, droughts and heat waves.
- 3.1.2 Trees have a role to play in climate change mitigation by absorbing carbon dioxide thereby reducing overall greenhouse gas levels in the atmosphere. In parallel with this, trees assist in adaption of the urban environment to the inevitable consequences of climate change.
- 3.1.3 The Mayor's Climate Change Adaptation Strategy (October 2011) outlines how London can be made more resilient to the impacts of climate change. It notes that trees can provide significant benefits in urban areas as they not only provide shade but can also help reduce air pollution and the urban heat island effect. Action 19 of the strategy is that the Mayor will work with partners to increase tree cover across London by 5% (from 20% to 25%) by 2025.
- 3.1.4 The City of London Corporation's Climate Change Mitigation Strategy states a short term objective of 15% energy reduction by 2015 and medium and long term reductions in greenhouse gases (34% by 2020 and 80% by 2050), using a baseline of 1990.
- 3.1.5 The City of London Corporation's Climate Change Adaption Strategy also promotes the use of trees and vegetation as adaptive measures to manage overheating and air pollution
- 3.1.6 'The right tree in the right place' is crucial to ensuring that trees of appropriate species are planted. These species should be able to withstand changed climatic conditions and resist the changing pathogens that may flourish in more favourable weather conditions.
<http://www.london.gov.uk/sites/default/files/Adaptation-oct11.pdf>
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Sustainability/Climate_change/

3.2 Air Quality

- 3.2.1 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. The Mayor has an Air Quality Strategy to improve air quality in London.
- 3.2.2 Road transport is the main cause of emissions of oxides of nitrogen and high concentrations of NO₂ (nitrogen dioxide, one of these oxides). Victoria Embankment, Upper Thames Street, Lower Thames Street and Tower Hill have

been identified as priority areas, these roads are controlled and managed by Transport for London.

- 3.2.3 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.

Mayors Air Quality Strategy:

<http://www.london.gov.uk/publication/mayors-air-quality-strategy>

City of London Air Quality Strategy

http://www.cityoflondon.gov.uk/Corporation/LGNS_Services/Environment_and_planning/Pollution/air+quality.htm

3.3 Biodiversity

- 3.3.1 Biodiversity describes the 'variety of life', or the range of plants, animals and habitats that exist in a given area. The City Corporation is committed to protecting the diversity of nature and in particular the three identified habitats in the City's Biodiversity Action Plan.

- 3.3.2 Maintaining and planting native trees is likely to optimise the insect population, with some species of tree being especially good in this regard for example Rowan (*Sorbus*) and Alder (*Alnus*).

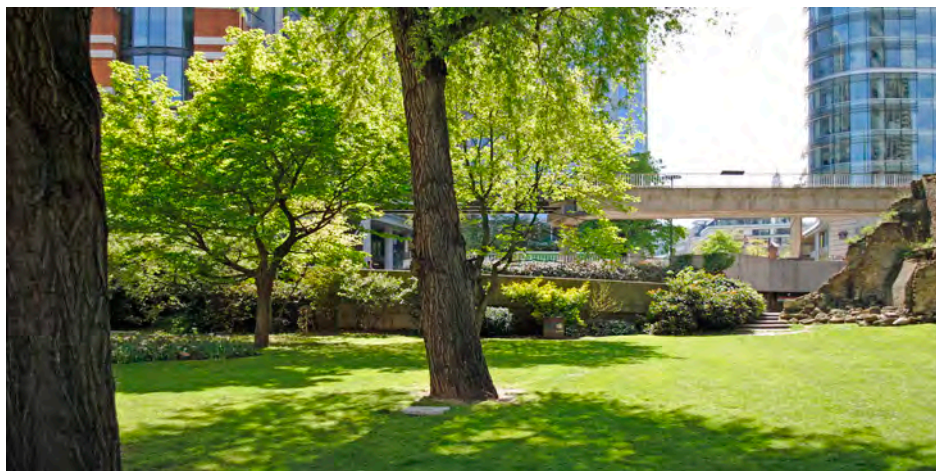
- 3.3.3 The Wildlife and Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2010, provide the strongest protection for British wildlife. There is statutory protection for bats and their roosts. If it is intended to do any tree work which might affect bats or their roosts, consultation of a specialist body is recommended for example Natural England, in order to ensure that actions comply with legal requirements such as obtaining a Habitats Regulation licence.

London biodiversity action plan

<http://www.lbp.org.uk/londonhabssp.html>

City of London biodiversity action plan 2010-2015

http://www.cityoflondon.gov.uk/Corporation/LGNS_Services/Environment_and_planning/Parks_and_open_spaces/City_Gardens/Barbican+Wildlife+Group.htm



3.4 Open Spaces in the City

- 3.4.1 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. Trees also provide an opportunity to mitigate against noise in very dense and busy environments.

http://217.154.230.218/NR/rdonlyres/D0641E3C-494E-438C-A404-F82D854B64DF/0/OS_CG_strategy.pdf

3.5 Limitations to Planting

Sub-surface infrastructure

- 3.5.1 The roads and pavements in the City are densely populated by many utility operators' distribution cabling, pipe work, plant and equipment. Tree roots can be particularly damaging to the public sewerage system and the City Corporation tries to follow the guidance on tree planting distances from sewers set out in Sewers for Adoption (6th Edition). 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).



- 3.5.2 If the premises lie within a zone within which London Underground have an interest in respect of any building and construction works and their effect on their operations, London Underground should be notified of the removal of any tree to ensure the safety of the railway and associated structures.

<http://www.cityoflondon.gov.uk/NR/rdonlyres/857C8896-9D2F-419D-A8A2-4DA95A2A5026/0/CityDeveloperGuidelines.pdf>

Scheduled Ancient Monuments and Archaeological remains

- 3.5.3 In locations where scheduled ancient monuments or archaeological remains survive or are suspected to survive below ground, the impact of tree planting needs to be considered, in order to avoid future damage. Scheduled monument consent is required for any work which would affect a scheduled ancient monument.
- 3.5.4 Irrigation in open spaces and next to trees may affect below-ground archaeological remains and monuments and this should be carefully considered to avoid any damage to archaeology. Alternative locations to avoid damage to a monument or remains should be found.

- 3.5.5 Where tree planting is acceptable from an archaeological point of view the areas should be recorded and excavated by an archaeologist. Planting in a tree pit with a membrane or other root barrier may be one way to restrict the impact of a tree in an area of archaeological remains in order to avoid damage to those remains.
- 3.5.6 Historical activity and the build up of archaeological remains over two thousand years, basement construction and services mean that there is little if any natural soil occurring in the City. Archaeological remains can survive up to six metres in depth in some areas of the City.
- 3.5.7 Trees planted in unrestricted soil conditions have a better chance of growing to healthy maturity than trees planted in planters or underground containers with positive drainage.
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Archaeology/Archaeology-local_information.htm

Views and Settings of Heritage Assets

- 3.5.8 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.
- 3.5.9 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 SPD's
- See also:*
Seeing the History in the View , English Heritage, 2011 <http://www.english-heritage.org.uk/publications/seeing-history-view/>
The Setting of heritage assets, English Heritage 2011 <http://www.english-heritage.org.uk/publications/setting-heritage-assets/>

4. Policy Framework

- 4.1 This section establishes the relevant policy framework which provides the context for the Strategy and helps inform its content. This section is split into national, regional and local policy.



4.1 National Policy and Strategies

- 4.1.1 'England's Trees, Woods and Forests' (2007) sets out the Government's vision and priorities for England's tree and woodland resource over the next 50 years. The five key aims of this Strategy are:
1. Secure trees and woods for future generations
 2. Ensure resilience to climate change
 3. Protect and enhance natural resources
 4. Increase the contribution that trees, woods and forests make to our quality of life
 5. Improve the competitiveness of woodland businesses and products
- 4.1.2 National Planning Policy provides the basis for every local plan and decision. The guidance provided by government has been simplified into one National Planning Policy Framework (NPPF) document. This document came into force on 27 March 2012. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.
- www.communities.gov.uk/planningandbuilding
- 4.1.3 This document states that planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Framework must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.

- 4.1.4 Section 8 sets out how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Section 10 refers to how it can meet the challenge of climate change, flooding and coastal change. Section 11 sets out how the planning system should contribute to and enhance the natural and local environment. Section 12 sets out the principles for conserving and enhancing the historic environment.
- 4.1.5 Paragraph 118 of the NPPF states that 'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss'.

4.2 Regional Framework

- 4.2.1 The London Plan is the overall strategic plan for London, and sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor. The current version of the London Plan was published in July 2011.

The London Plan (July 2011)

- 4.2.2. Policy 7.21 Trees and Woodlands' states that 'Trees should be protected, maintained and enhanced following the guidance of the London Tree and Woodland Framework (or any successor strategy)'.
- 4.2.3 The plan strongly supports boroughs developing their own Tree Strategies to co-ordinate delivery.
- Policy 7.21 notes that 'Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.
- Policy 7.5 Public Realm encourages the planting of trees in public realm schemes.
- Policy 7.19 Biodiversity and access to nature notes that development proposals should make a positive contribution to the protection, enhancement, creation, promotion and management of biodiversity. This means planning for nature from the beginning of the development process and taking opportunities for positive gains for nature through the layout, design and materials of development proposals and appropriate biodiversity action plans. Boroughs should also identify and protect and enhance corridors of movement, such as green corridors.
- 4.2.4 The Mayor also has numerous strategies related to Air Quality, Biodiversity and Climate Change which variously relate to trees and is also preparing his own tree and woodland guidance.
- <http://www.london.gov.uk/priorities/planning/londonplan>

London Tree and Woodland Framework

- 4.2.5 The London Tree and Woodland Framework is part of the Environment Strategy of the Greater London Authority. It was launched on the 23rd March 2005 and is the result of a broad partnership of London-wide bodies headed by the Forestry Commission and the GLA.

- 4.2.6 It is committed to maintaining and enhancing London's trees and woodlands as a vital part of the environment. It puts forward a framework of key aims and objectives for trees and woodlands in London to realise their contribution to the natural, built and managed environment, people, and the economy.
<http://www.forestry.gov.uk/ltwf>

No Trees No Future, Tree and Design Action Group (2010)

- 4.2.7 This outlines the importance of trees and their value socially, environmentally and economically. It notes that the valuing of trees economically is critical in ensuring the protection and increase of trees. Chapter 7 relates to Trees and Planning which highlights the importance of local authorities developing a tree strategy.
[http://www.forestry.gov.uk/pdf/london-tdag-no-trees-no-future-with-cs.pdf/\\$FILE/london-tdag-no-trees-no-future-with-cs.pdf](http://www.forestry.gov.uk/pdf/london-tdag-no-trees-no-future-with-cs.pdf/$FILE/london-tdag-no-trees-no-future-with-cs.pdf)

4.3 City of London Framework

Community Strategy: The City Together Strategy

- 4.3.1 "The City Together will work to support the City of London as a leading financial and business centre in a way that meets the needs of its diverse communities and neighbours"
- 4.3.2 Within this are five key themes, including to 'protect, promote and enhance our environment'. Delivery of the many strategic priorities of the Community Strategy are supported by maintaining and increasing trees in the City for example to improve air quality, conserve and enhance biodiversity, and to reduce the impact of climate change.
http://www.cityoflondon.gov.uk/Corporation/LG_NL_Services/Community_and_living/Community_advice/Community_strategy/community.htm

Local Development Framework

- 4.3.3 The Local Development Framework (LDF) comprises a series of policy documents, separately prepared, that together set out the planning strategy for the City. Until the documents are completed, certain 'saved' policies of the Unitary Development Plan, adopted in 2002, continue in force. The documents that comprise the LDF guide the type and location of development, as well as specific considerations such as the historic environment and protected views. The following documents make up the LDF:

Core Strategy

- 4.3.4 The Core Strategy sets out the overall spatial vision for the City and includes many policies on a broad range of issues within the City. Point 3 of Policy CS19 Open Spaces and Recreation is relevant to trees.
Policy CS19 aims to encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure while enhancing biodiversity by:
'Protecting the amenity value of trees and retaining and planting more wherever practicable'.
Other policies relevant to trees include Policy CS15 Sustainable Development and Climate Change; CS12 Historic Environment and CS2 Utilities Infrastructure.

Development Management DPD

- 4.3.5 The Development Management Development Plan Document (DM DPD) will provide more detailed policies related to the policies in the Core Strategy. The Department of the Built Environment will use the Core Strategy and policies within the DM DPD to guide development.
- 4.3.6 Until the DM DPD is adopted UDP policy ENV9 Trees and Landscaping is still in use.

Supplementary Planning Documents

- 4.3.7 There will be a number of Supplementary Planning Documents (SPDs) produced by the City Corporation, one of which is The Tree Strategy SPD.
- 4.3.8 The Tree Strategy SPD will provide detailed guidance on the implementation of Core Strategy Policy CS19: Open Spaces and Recreation and will be used to guide development proposals where existing trees are affected, new trees proposed, and help to protect trees.
<http://www.cityoflondon.gov.uk/ldf>

5. The Tree Strategy and Objectives

Core Strategy

5.1 The Core Strategy provides the foundation for the Tree Strategy, specifically:

Policy CS19: Open Space and Recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the number, amount and quality of open spaces and green infrastructure in the City, while enhancing biodiversity, by:

1. Seeking to maintain a ratio of at least 0.06 hectares of high quality, publicly accessible open space per 1,000 weekday daytime population:
 - (i) protecting existing open space, particularly that of historic interest, or ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality on or near the site;
 - (ii) securing public access, where possible, to existing private spaces;
 - (iii) securing additional publicly accessible open space and pedestrian routes, where practical, particularly in the eastern part of the City;
 - (iv) creating additional civic spaces from underused highways and other land **where this would not conflict with other strategic objectives**;
 - (v) encouraging high quality green roofs, particularly those which are publicly accessible.
2. Improving access to new and existing open spaces, including those in neighbouring boroughs, promoting public transport access to nearby open space outside the City and ensuring that open spaces meet the needs of all of the City's communities.
3. Increasing the biodiversity value of open spaces, paying particular attention to sites of importance for nature conservation such as the River Thames. Protecting the amenity value of trees and retaining and planting more trees wherever practicable.
4. Improving inclusion and access to affordable sport, play and recreation. protecting and enhancing existing facilities and encouraging the provision of further facilities within major developments.

Tree Strategy Aim

The City of London Tree Strategy aims to increase City 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.

5.2 The Tree Strategy aim has been formulated taking into account the Mayors 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 City Corporation owned trees this equates to a total of 65 trees, this is a net figure which takes into account likely tree felling.

Tree Strategy Objectives

5.3 The Tree Strategy Objectives have been developed within the policy context set by national and regional policy and the Core Strategy.

Existing Trees

1. To protect, manage and enhance the existing tree stock in its environment, in accordance with good arboricultural practice.
2. To safeguard trees which are subject to Tree Preservation Orders and create new Tree Preservation Orders, including trees in conservation areas, when considered expedient to do so.
3. To ensure that full account is taken of existing trees including street trees, on and adjacent to development sites; that they are considered at the earliest design stage and are protected during any works and subsequently in accordance with current standards and legislation.
4. To ensure Utility companies protect existing trees when undertaking works by complying with current guidance.

Removal

5. To only permit the removal of trees in exceptional circumstances and in accordance with good arboricultural practice and to ensure that adequate and appropriate replacement tree planting places are identified and confirmed before any trees are removed.

Unauthorised Work

6. To initiate legal action where unauthorised tree work has been undertaken or when breach of condition has occurred.

Tree Planting

7. To increase the existing stock of trees and especially to encourage the planting of large-canopied species where appropriate. To increase City Corporation owned trees by 5% by 2019.
8. To encourage the planting of trees that make a positive contribution to the character and appearance of the City's townscape and encourage green corridors where appropriate.
9. To encourage the planting of trees that, having regard to their amenity, contribute to the biodiversity of the City, make a contribution towards air quality and /or help in off-setting climate change.

Information Sharing

10. To provide information and advice about the value and contribution of trees in the City to developers, businesses, residents, visitors and others.
11. To explore ways for greater involvement, consultation and partnerships with the GLA, developers, businesses, residents and other interested parties to fulfil the aims of this strategy and its progression / implementation.

6. Achieving the Objectives

6.1 How the City Corporation Protects Trees

Role as a local planning and highway authority

6.1.1 The City Corporation's duty to protect trees and ensure that they do not interfere with pedestrians or road users is carried out under:

- The Town and Country Planning Act 1990 (as amended)
- Town and Country Planning (Tree Preservation) (England) Regulations 2012
- Highways Act 1980

Prior to undertaking any works to trees the planning history of a site should be fully researched to ensure compliance with any terms and conditions.

Conditions and Section 106

6.1.2 The City Corporation may impose a condition on a planning permission or an obligation secured through a S106 agreement or unilateral undertaking to ensure the protection of existing trees, including those subject to Tree Preservation Orders. Conditions may be attached to require the retention of a tree, the means of protection during development or the provision of a new tree. Accompanying section 106 agreements may be used to secure obligations for example planting of additional trees or a financial contribution towards this.

Section 278 Agreements

6.1.3 Should a development result in works to the public highway that would necessitate the removal of a tree, a Section 278 agreement may be entered into in order that a developer pays for a replacement.

Tree Preservation Orders

6.1.4 Tree Preservation Orders (TPOs) give legal protection against a tree being cut down, topped, lopped, uprooted, wilfully damaged or wilfully destroyed. It is an offence to cut any part of a tree which is the subject of a TPO including cutting the roots, without first obtaining consent from the Local planning authority. It is an offence to cause or permit another to harm a protected tree.

6.1.5 There are currently nine TPOs in place, covering 24 City Corporation trees and 10 privately owned trees.



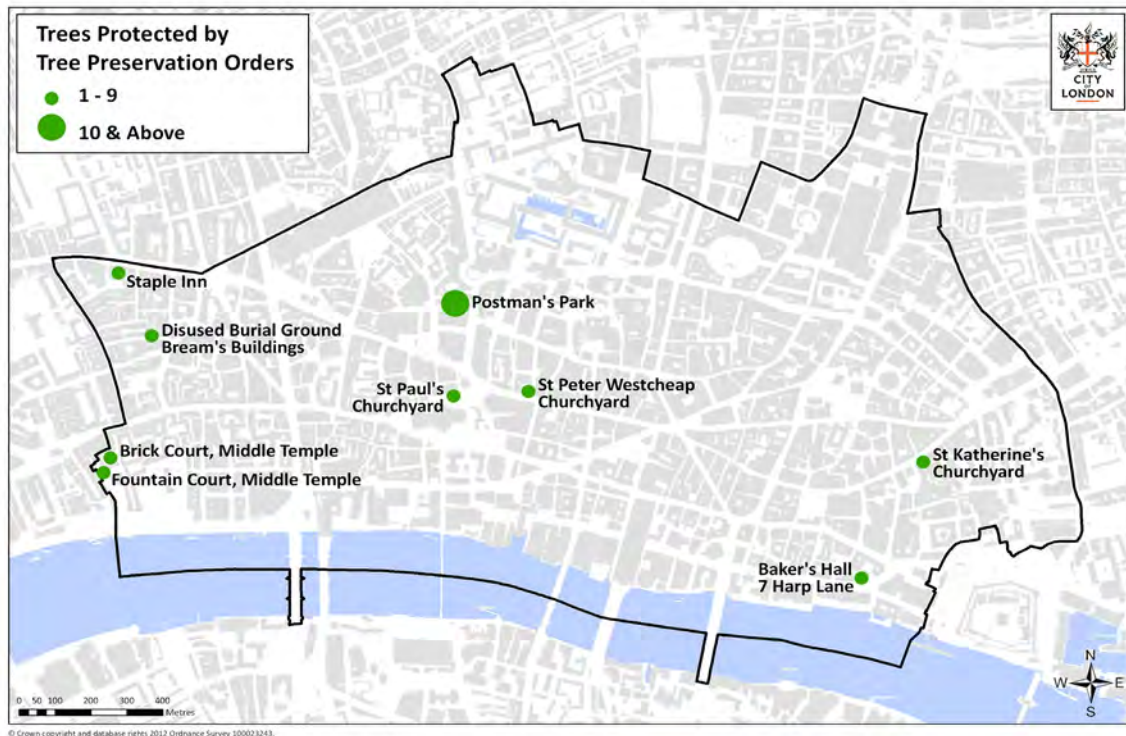


Figure 2: Location of trees protected by Tree Preservation Orders

- 6.1.6 Anyone wishing to carry out works to trees which are the subject of a TPO is required to make an application for consent to carry out the works subject to exemptions set out in the Town and Country Planning (Tree Preservation) (England) Regulations 2012. Permitted development rights do not override this requirement.
- 6.1.7 A TPO may be made by a local authority if it appears to them to be expedient in the interests of amenity to make provision for the preservation of trees. The City Corporation may make TPOs in respect of their own trees or privately owned trees.
- 6.1.8 When deciding to make a TPO the amenity of the tree is assessed taking into account such factors as visibility, individual impact and wider impact.
- 6.1.9 When making TPOs the City Corporation will notify all those persons interested in the land affected by the Order, in accordance with current regulations allowing at least 28 days for representations. The City Corporation will consider all representations and objections before deciding whether or not to confirm the Order, either with or without modifications.
- 6.1.10 If the tree is made the subject of a TPO any subsequent works will require consent under that Order.

Conservation Areas

- 6.1.11 The statutory definition of a conservation area is “an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”. 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.

6.1.12 There are 26 conservation areas in the City covering just over a third of its area.

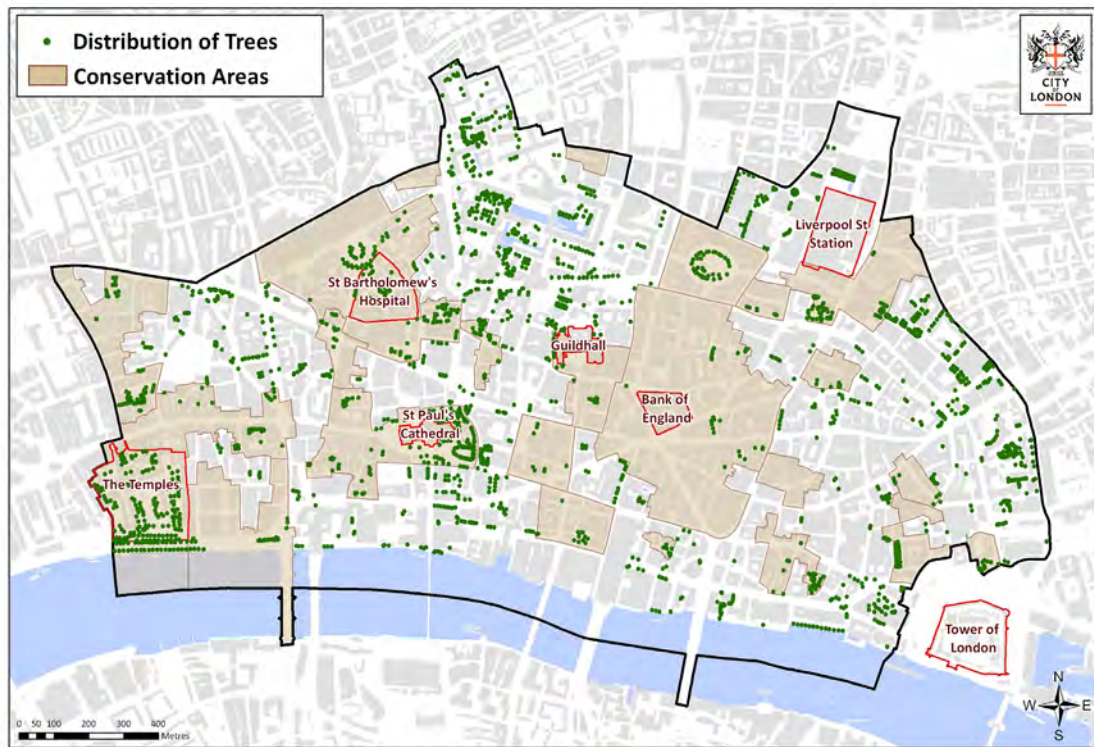


Figure 3: Location of trees in relation to Conservation Areas
 Source: City of London Tree Survey data 30 June 2010

6.1.13 Anyone wishing to carry out works to trees in conservation areas (excluding those which are subject to a TPO), is required to give the City Corporation six weeks notice of their intention to do so, providing specific information about the planned works. This is a section 211 notice.

6.1.14 A section 211 notice gives the planning authority an opportunity to consider whether a TPO should be made in respect of the tree. They may deal with the section 211 notice in one of three ways:

- Make a TPO if justified in the interests of amenity
- Decide not to make a TPO and allow the 6 weeks to expire, at which point the works may go ahead so long as it is carried out within 2 years from the date of the notice
- Decide not to make a TPO and inform the applicant that the work can go ahead.



6.1.15 There is no statutory requirement to publicise the section 211 notice. Where there is likely to be public interest the City Corporation will seek the views of interested parties prior to determining whether the tree merits a TPO. This may involve writing to nearby residents, displaying a site notice or placing an advertisement in a local newspaper.

Historic Parks and Gardens

6.1.16 Four gardens are on English Heritage’s Register of Historic Parks and Gardens. The gardens by virtue of their designation are historic assets of national importance and contain trees both of significant amenity and historic value.

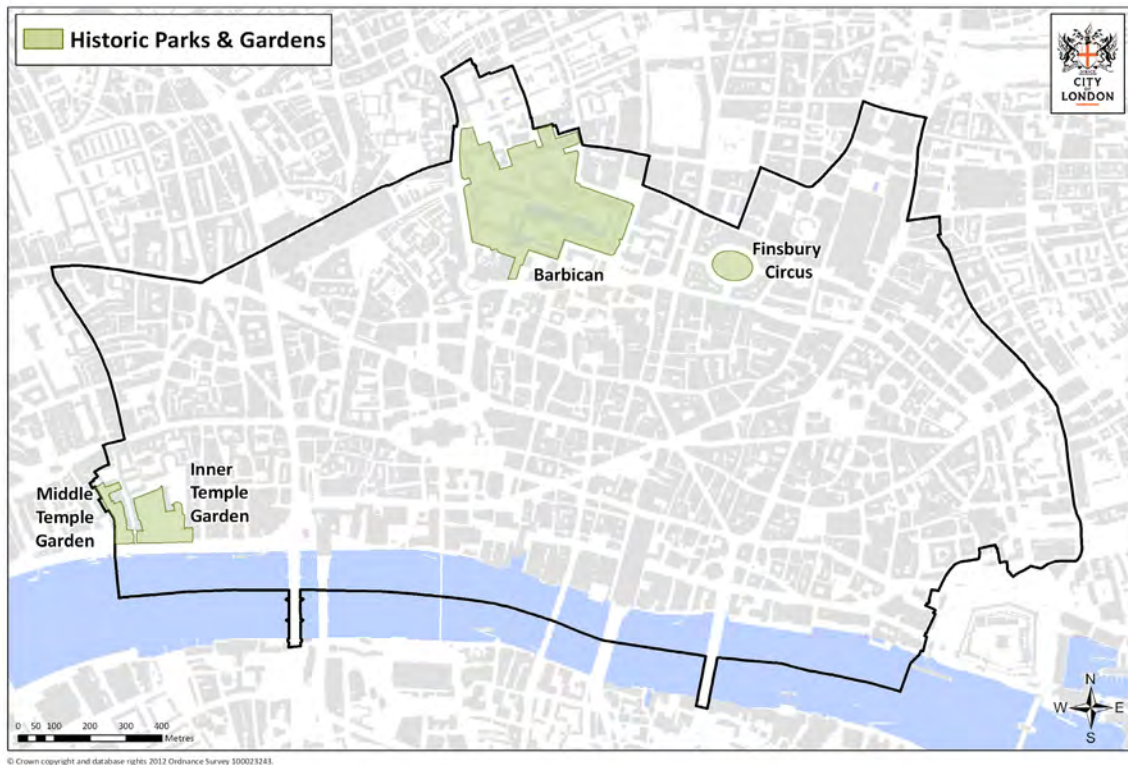


Figure 4: Location of Historic Parks and Gardens

6.1.17 Two gardens are in private ownership, Inner and Middle Temple and two are maintained by the City, Finsbury Circus and Barbican. The local planning authority must consider the impact of any proposed developments on the special character of the area.

<http://www.english-heritage.org.uk/caring/listing/criteria-for-protection/page/criteria/>



Penalties for unauthorised work to a tree subject to a TPO and/or in a Conservation Area

- 6.1.18 Penalties for carrying out unauthorised works to a tree that is the subject of a TPO or a tree growing in a conservation area are the same.
- 6.1.19 A Magistrates' Court may impose a fine of up to £20,000 on a person convicted of deliberately destroying such a tree or damaging it in a manner likely to destroy it and up to £2,500 where unauthorised work is carried out to a tree in a way that is not likely to destroy it.
- 6.1.20 Section 210(3) of Town and Country Planning Act 1990 states that in determining the amount of any fine for the offence of cutting down, uprooting or wilfully destroying a tree, or topping, lopping or wilfully damaging it in a way that it is likely to destroy it, the Court must have regard to any financial benefit which has accrued or is likely to accrue, in consequence of the offence.

Dead and dangerous

- 6.1.21 All trees have the potential to cause harm if left unmaintained; therefore any trees identified as dead or dangerous must be dealt with promptly. In the case of protected trees, consent is not required to cut down or carry out works to a tree the subject of a Tree Preservation Order on the ground that it is dead or to the extent such works are urgently necessary to remove an immediate risk of serious harm, or to such other extent as agreed in writing by the authority prior to the works being undertaken. Where the above statutory exemptions are relied on in respect of a tree in a conservation area the requirement to give the local planning authority six weeks' notice does not apply. Where works are carried out under these statutory exemptions the burden of proof to show, on the balance of probabilities, that the tree was dead or that the works were urgently necessary to remove an immediate risk of serious harm rests with the defendant. Should that person fail to show this, then they would be liable to prosecution if works were undertaken.
- 6.1.22 Anyone proposing to carry out works to a tree the subject of a Tree Preservation Order under the above statutory exemptions, is required to give the local planning authority at least five working days' notice of their intention to carry out the works, unless the works are urgently necessary to remove an immediate risk of serious harm, in which case notice must be given as soon as practical after the works become necessary. The same notice should be given where the tree concerned is in a conservation area. A replacement tree will be sought unless there are exceptional circumstances.
- 6.1.23 Where it is proposed to remove non-protected trees on the grounds that they are dead or dangerous the proposed works should be discussed with the City Corporation, except in an emergency, as the trees may be the subject of a planning condition or a planning obligation attached to a section 106 agreement and or unilateral undertaking.

Section 96 Highways Act 1980

- 6.1.24 Section 96 of the Highways Act 1980 empowers the highway authority to plant trees in highways maintainable at public expense and to do anything expedient for the maintenance or protection of trees and is another example of how the City Corporation may provide and protect trees.

6.2 Development and Trees

- 6.2.1 Trees on streets, open spaces and private land are at risk from the pressures of development, whether as a result of alterations to an existing building or the redevelopment of a site. Where development is proposed it is essential that both existing and proposed trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted.



- 6.2.2 In determining applications for development the City Corporation is required to have regard to the Development Plan (i.e. The London Plan, the Core Strategy DPD (Adopted September 2011) and saved policies of the Unitary Development Plan 2002). Applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. The effect of proposed development on trees is a material consideration when determining planning applications. There will be a presumption that trees on development sites will be retained unless there are exceptional circumstances to justify their removal. In the event of a tree needing to be removed a replacement tree which enhances the amenity will be required.
- 6.2.3 Where trees are retained within the development scheme, the impact of building should be considered as this work may result in significant risks to their health. Consideration should be given to how trees on the site and on neighbouring sites and streets will be protected during demolition, reconstruction and future maintenance of the building. This includes how the building would be demolished, the position and spread of the trees and their roots in relation to the new building, how the new building would be constructed, where materials would be stored, the position of scaffolding, site huts, cranes and site access.
- 6.2.4 Assessment should be made as to whether the operation of future window cleaning cradles and access to the building for general maintenance would affect existing or proposed trees on or adjoining the site and should be designed to avoid any potential impact or possible damage.
- 6.2.5 Excavation and construction near trees should be in line with British Standard 5837:2012 and take account of any conditions on the relevant planning permission and obligations set out in accompanying section 106 agreements and or unilateral undertaking.
- 6.2.6 Further guidance on what is required to be submitted to accompany planning applications affecting trees is available.
http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning/contact_num.htm

6.3 Highways and Trees

- 6.3.1 A highway is a way over which the public have a right to pass and repass, and classes of highway include footpaths, bridleways and carriageways. Highways maintainable at public expense are the responsibility of the highway authority.
- 6.3.2 A City Walkway is a way or place, declared under section 6 of the City of London (Various Powers) Act 1967, on which the public may have access on foot and may pass and re-pass on foot as of right, subject to some restrictions. A City Walkway is not a highway except for certain limited purposes but the City Corporation has responsibility for maintenance of the surface unless agreed otherwise.
- 6.3.3 A balance needs to be drawn between retention of trees for positive amenity benefit and the public highway /City Walkways being kept clear of obstruction for safe pedestrian use. See guidelines contained in the official government guidance on good urban street design (Manual for Streets 2).



Damage to trees during highway works

- 6.3.4 Statutory undertakers such as those supplying water, gas and electricity and cable companies are permitted to undertake works on the highway. Damage to street trees by contractors is a growing concern. Particular care is needed to avoid damaging trees when installing and maintaining services. The NJUG (National Joint Utilities Group) has published guidelines which all utility companies are committed to implementing. The City Corporation aims to protect all trees affected by highway works and will seek damages in the event of loss or damage. Guidance on codes of practise is available.

Trees abutting or overhanging a highway

- 6.3.5 The City Corporation will ensure that trees do not present any danger to the public by carrying out essential maintenance. Where a tree abuts a highway it should be inspected regularly to ensure that it does not interfere with either the pedestrian movement or traffic flow in the vicinity. Care should also be taken when choosing which species to plant in an area close to traffic. Tree canopy heights must be considered and sight lines protected. On request the City Corporation will provide advice on appropriate species.
- 6.3.6 Where private trees overhang the public highway so as to endanger or obstruct the passage of vehicles or pedestrians or interfere with drivers' views the City Corporation may serve a notice on the landowner or occupier requiring him to prune the tree to remove the danger, obstruction or interference. A similar notice may be served if the tree is dead, diseased, damaged or insecurely

rooted and is likely to cause a danger by falling on the highway. There are default powers for the highway authority to carry out the works and recover its expenses.

Department of the Built Environment

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning/contact_num.htm

Considerate contractor scheme

www.cityoflondon.gov.uk/Corporation/LGNL_Services/Business/Business_support_and_advice/considerate_contractor_scheme

6.4 Management of Existing Trees

Privately owned Trees

- 6.4.1 There are approximately 1106 private trees within the City boundary. They are to be found within the Inner and Middle Temple, in private gardens including livery companies, in churchyards and burial grounds and on residential and business premises.
- 6.4.2 Private trees make a significant contribution to the visual amenity of the City of London and provide an important habitat for wildlife. They may act as landmarks, identify a particular location, provide a foil to the urban townscape and impart a sense of character to the area. In some places the character of the townscape is derived from a single tree; in others from the impact of groups of trees which are both visible and accessible to the public.



- 6.4.3 The City Corporation exercises considerable control and influence over the treatment of private trees
- (1) **Care and maintenance of Private Trees**
Tree owners have a duty of care towards others and should regularly inspect trees in their ownership or care, maintaining them in a good and safe condition.
 - (2) **Works to Private Trees**
Private owners should contact the City Corporation, Department of the Built Environment (Planning) before carrying out works to trees.
It is advisable to seek legal advice before carrying out any works to a protected tree (either subject to a TPO or in a conservation area), unless there is imminent danger to the public.

The City Corporation will not normally raise any objections to TPO applications or section 211 notices for carrying out regular pruning of trees in accordance with British Standard guidelines and subject to any consultations.

<http://shop.bsigroup.com/en/ProductDetail/?pid=00000000030139494>

More extensive works or the removal of trees will require careful consideration and unless there are sound reasons such works will not be permitted. This also applies to proposed works to a tree that is the subject of a planning application.

(3) Neighbouring trees - Shade/blocking of satellite reception for TV

Whilst shade from a tree rooted in a neighbour's garden or on their land may be unwelcome, the City Corporation is unlikely to consider loss of light to be sufficient justification to allow the removal or excessive pruning of a tree over which they have control.

Similarly the City Corporation is unlikely to consider claims of trees blocking satellite reception to be sufficient justification to allow the removal of or excessive pruning of a neighbouring tree.

Leaves in gutters will not be grounds to allow the removal of offending branches. This should be managed by gutter protection and regular maintenance.

(4) Boundaries

Branches of trees, rooted in a neighbouring property, which overhang the boundary, may be cut back to the boundary to prevent or abate a nuisance. The term nuisance is used in the legal sense and the branches remain the property of the owner.

(5) Tree Preservation Orders

Some private trees are already protected by TPOs. New TPOs may be established in future to protect other private trees that have a special or outstanding amenity and therefore merit greater protection.

Useful information sources

Guidance on how to submit applications and notices:

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning/contact_num.htm

City Corporation Owned and Managed Trees

6.4.4 Street trees and trees in open spaces make a substantial contribution to the appearance of the townscape and add significantly to the amenity of the area. They also have an environmental benefit providing a wildlife habitat, shading and improved air quality, making the City a pleasant place to live, work and visit.



(1) Maintenance of City Corporation Trees

There are approximately 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 TfL roads are the responsibility of Transport for London, as the highway authority for these roads.

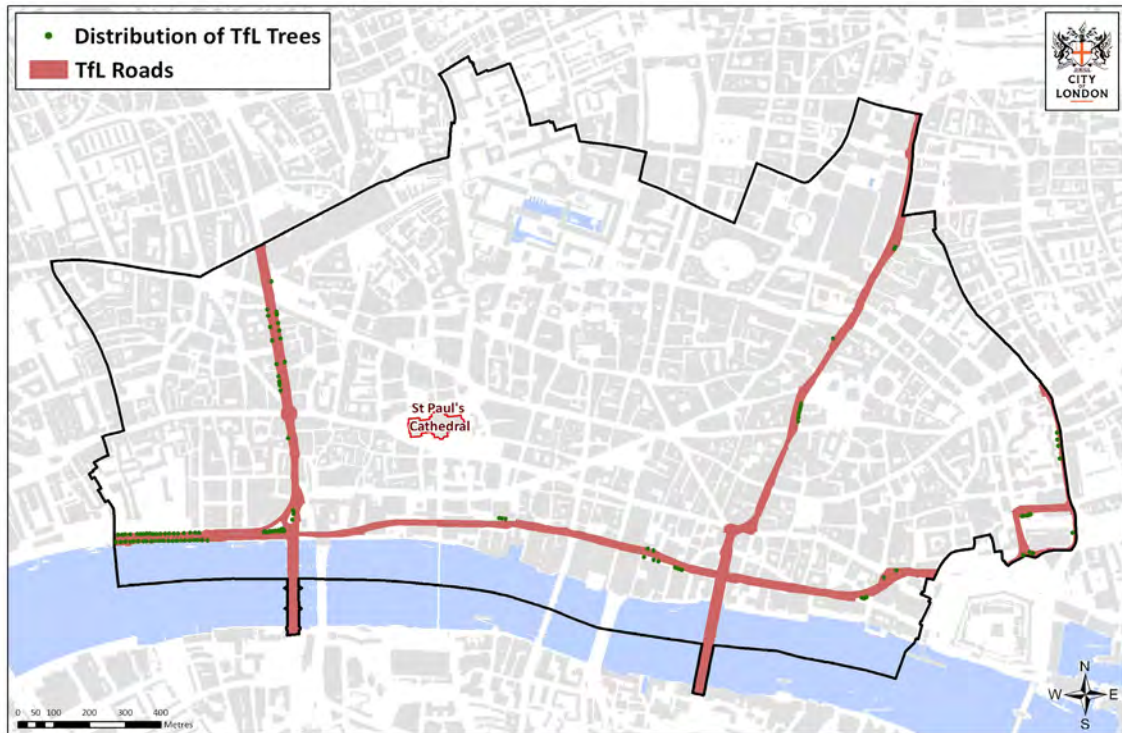


Figure 5: Roads and trees thereon which are the responsibility of Transport for London

- 6.4.5 The City Corporation is exempt from the requirement to submit a section 211 notice for works to its own trees in conservation areas. In the case of those trees managed by the Open Spaces Department on behalf of others, notice must be given by the owners of the trees.
- 6.4.6 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 cover a total of 24 trees owned or managed by the City Corporation.
- 6.4.7 There is no statutory requirement for the City Corporation to consult with adjoining occupiers prior to undertaking routine maintenance works to City trees. Adjoining occupiers may, however, be consulted if considered appropriate.

Work Programme

- 6.4.8 Trees are pruned to ensure that they do not present a hazard to the users of both footways and roads and to give adequate clearance from adjoining properties whilst maintaining a well balanced and healthy tree. Specific requests for pruning by residents and businesses are considered but these have to be assessed in relation to the amenity of the trees, the environmental benefits and the Open Spaces management regime.
- 6.4.9 A rolling work programme for the inspection of street trees and trees on City Corporation owned and/or maintained open spaces in the City, is managed

by the Open Spaces Department. The department discharges its public safety responsibility by carrying out an in house inspection of all the trees in its care on a regular basis according to the maturity of the tree. This leads to a 4-yearly review across the entire tree stock, with mature trees being inspected annually.

- 6.4.10 Detailed information is recorded on each tree and captured on a computerised database.
- 6.4.11 The Open Spaces Department actively seeks to preserve its stock of trees by only allowing removal in exceptional circumstances. If a tree has to be removed a replacement tree is replanted wherever possible. Trees of an appropriate size and species are selected to preserve and enhance amenity and environmental benefits.
- 6.4.12 It is recognised that there are a number of other trees under the care of the Open Spaces Department that have a special or outstanding amenity value and merit protection. It is proposed that City Corporation owned and managed trees will be the subject of a review to identify new trees which potentially merit protection by TPOs.

6.5 New Trees and Tree Planting

Townscape

- 6.5.1 The planting of trees should respect and enhance the amenity of an area, reinforcing its character and appeal. An increase in tree planting is actively sought in areas of the City where trees would add to the amenity. In densely developed areas trees can be used to create areas for relaxation by using suitable street corner sites to locate individual trees with seating underneath. This can contribute to the creation of additional open spaces in the City.
- 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 heritage assets such as nationally and locally important buildings and monuments or reveals a network of streets and alleyways. In such areas trees may not be characteristic of the area and in all cases any new tree planting will need to respect and take account of the historic landscape, landmarks and significant and protected views.
- 6.5.3 Practical Guidance on tree planting can be found in Part 2 and further national guidance is given in the National Planning Policy Framework.

Different Settings-open spaces, streets and residential estates

- 6.5.4 Trees should always form part of the overall townscape context and different planting may be appropriate for a public garden or open space compared to a street. 'Garden trees' do not necessarily make good 'street trees'.
- 6.5.5 Street tree planting must be designed to take account of pedestrian needs and other highway activity (for example loading, unloading, proximity to bus stops), as well as below ground conditions. Pavement width and footfall are important considerations and trees should be planted only where they do not create a hazard for the general public, especially visually impaired people or wheelchair users.
- 6.5.6 The former Department of Transport's publication 'Manual for Streets 2' provides guidelines for planting street trees.



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. Fruit trees may be considered suitable in appropriate locations on residential estates where a maintenance and management plan is developed with the residents. Consideration should be given to potential problems resulting from fruit falling and collecting on the ground. There should be a process of consultation with the developer and the local community.

Large-Canopied Trees and Large Species Trees

6.5.8 The London Plan advocates the planting of additional trees, particularly large-canopied trees, in new developments, wherever appropriate. Large-canopied trees refers to the type of tree species and not the size of the tree when planted. It is recommended that a maximum planting girth of 35cm (with irrigation) or 25cm in other areas to ensure longevity of the tree.

6.5.9 Large-canopied trees are an essential component of a Green Infrastructure framework and represent one of the most effective means of creating a bio diverse community within an urban centre.

6.5.10 CIRIA's draft guide defines a large species tree as one that would grow in excess of 15m high when mature, provided their growth is not restricted by constraints to root development. Examples of large species trees commonly found in the UK include alder, ash, beech, elm, horse chestnut, lime, oak, plane and walnut.

6.5.11 Cost-benefit analysis has been carried out whereby costs (tree management) and benefits (environmental) are assessed alongside tree size (canopy cover and leaf area). This research concluded that large species trees provide bigger cost savings and greater benefits than small and medium trees, and that benefits

	Small trees (<7.5m)	Medium trees (7.5-12m)	Large trees (>12m)
Benefits per annum	\$23	\$33	\$55
Costs per annum	\$14	\$17	\$18
Net benefits	\$9	\$16	\$37

Summary of data provided by the US Department of Agriculture and US Forest Service (2004)

Source: *Large species trees in urban landscapes - a design and management guide* CIRIA, funded by Defra and the Forestry Commission.

The Canopy: <http://www.helm.org.uk/upload/pdf/The-Canopy.pdf?1302601721>

outweighed whole life costs in all instances. The figures below are from an American study and are therefore recorded in US Dollars.

Species Selection

- 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 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 surrounds.
- 6.5.13 Species should normally be planted in positions which permit the tree to grow to maturity without inhibition of form. In addition to consideration of amenity, species selection should encourage biodiversity and making a contribution towards air quality and / or off-setting climate change.



- 6.5.14 Maintenance and cleaning needs should be considered when choosing species for street planting. Trees which secrete sticky fruity substances have low hanging branches, or a large root system may not be suitable. Leaf clearance and litter removal are also considerations (for example tree grilles which do not allow litter such as discarded cigarette ends to collect, should be used).
- 6.5.15 Trees in churchyards should be planted to ensure that their root system does not interfere with the foundations of historic buildings, tombstones, vaults and burials for example by using appropriate root barriers.
- 6.5.16 The selection of trees should be undertaken using the guidance below:
<http://apps.rhs.org.uk/advicesearch/Profile.aspx?pid=712>

Planting and Maintenance

- 6.5.17 Maintenance of new trees must be considered, particularly in terms of debris on the public highway that must be cleared. Funding for this ongoing maintenance should be considered and provided in any new planting scheme. Guidance on planting and maintenance regimes are found in Part 2.
- 6.5.18 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.

6.6 Community Involvement

- 6.6.1 The City community includes those that are resident, working, studying or visiting the City of London. Volunteers from this community are offered a variety of opportunities to assist in the creation and maintenance of the open spaces and gardens. This can involve activities such as planting, tree sponsorship, wildlife habitat creation and wildlife surveys.
- 6.6.2 Through these volunteer opportunities the City community is encouraged to take an active role in their local green spaces and streetscapes, fostering a sense of ownership and engagement. This also promotes relationships between individuals in this diverse community through social interaction during these activities, and also educates people about their local green space and the flora and fauna which can be found in the City of London.
- 6.6.3 Opportunities may involve volunteers getting their hands dirty helping to plant as part of larger scale planting improvements, or conducting wildlife surveys of birds or other fauna. Wildlife surveys may be undertaken independently by regular volunteers with support from City Garden's staff, or as part of formally organised wildlife activity days. Local schools form a vital part of the community and are frequently involved in all these activities. There are also key links to the school curriculum and so activities can focus on educating young people about the biodiversity and ecology of the City Gardens.
- 6.6.4 Sponsoring trees is a popular way for the business community within the City of London to contribute towards their local green space or streetscape. This forms a link between these organisations or individuals and a certain tree or garden, thereby fostering a relationship and promoting a sense of ownership and pride in local green spaces.
- 6.6.5 As such, the variety of ways the City community can be involved fosters important relationships between individuals and both their local green spaces and other community members.

Paragraph 2.1.2 Part 1 of the strategy details the importance of commemorative trees. See 2. City Tree Survey