

Wokingham Draft Tree Strategy Public Consultation

WDVTA Response

The consultation response is an on-line process consisting of 24 questions most requiring a selection of strongly agree, agree, neither agree nor disagree, disagree or strongly disagree followed by a box for free format text for comments.

This document is a transcription of the questions and the answers submitted on behalf of WDVTA, with the comments shown as bullet points.

Q1. Answering on behalf of – an organisation

Q2. Name of organisation - WDVTA

Q3. Do you agree that the council should produce a Tree Strategy that brings together and improves on its existing policies for planting, inspecting and maintaining trees?

Strongly Agree

- These comments are not related to this question but are very important feedback that is not covered by any of the following questions.
- The Stakeholders on page 6 must include all residents and businesses in the Borough.
- As the document is necessarily lengthy, a short summary for residents would be useful.
- The Tree Council is referenced with respect to their guidance on the management of ash die back. They should be included as a stakeholder.
- There is no reference to Tree Wardens, a voluntary scheme initiated and supported by The Tree Council. The Strategy is an opportunity to include and promote the voluntary role of Tree Wardens within the Borough.
- Use photographs of trees from the borough rather than 'stock' images in the document. Include photographs of ancient or veteran oaks, willows, examples of Champion trees and examples of Wellingtonia trees or avenues.
- Page 28 covers the management plans for council owned woodland and country parks. A link is needed to where the plans can be found and read, not to 'contact a team'.
- For woodland with public access that is not managed by the Countryside team, the strategy should include that the Countryside team will support local conservation groups with the development of management plans.
- Where will the strategy be accessible? All WBC libraries should have a physical copy for public reference access and all librarians should be made aware that it is available.

Q4. Do you agree that 10 years is an appropriate period for the strategy to cover?

Strongly Agree

- The strategy should include a requirement that the canopy cover should be reassessed every 10 years, rather than the goal (page 60) that it will be reviewed.
- The strategy should also include that it will be kept in line with legislation and best practice whenever these change as well as reviewed and updated every ten years

Q5. Do you agree that the strategy should aim to increase tree planting on private and public land, involving the community as much as it can?

Strongly Agree

- The public 'involvement' should include encouraging public engagement in the planning of tree planting – location and species as well as in the physical planting itself.

Q6. Do you agree that trees play a vital role in improving air quality and offsetting climate change, providing habitats for wildlife and improving people's physical and mental health?

Strongly Agree

No comments added

Q7. Do you agree that the strategy should set clear procedures for protecting trees through measures like tree preservation orders, and for acting when they are threatened?

Strongly Agree

- Protection is needed for semi-mature trees as well as established trees, hedges and woodland, as it is the current semi-mature trees that will grow into the mature trees of the future bringing the highest benefits to the borough.

Q8. Do you agree that the strategy should set clear expectations for how developers should incorporate and maintain planting when preparing planning applications?

Strongly Agree.

- Developers need to be required to retain existing trees, woodland, copses and hedgerows as well as increase the canopy cover and deliver a biodiversity net gain. The strategy needs to clearly include the developer's responsibility for the maintenance of new planting on developments for the first 5 years and WBC have a responsibility to monitor that this maintenance is undertaken.

Q9. Do you agree that the strategy should aim for Wokingham borough to reach the Food and Agriculture Organization of the United Nations' Tree City of the World standards?

Agree.

Q10. Would you like to answer the more detailed questions?

Yes

Q11. Do you agree that the relevant national legislation on trees and woodlands has been considered in preparing the draft Tree Strategy?

Strongly Agree

- The additional protection to veteran and ancient trees within the NPPF should be highlighted in section 3d) on page 9.
- Searches for Circular 36/78 mentioned on page 10 did not get many hits, does it still exist and is it in use?

Q12. Do you agree that the relevant existing and emerging Wokingham Borough Council plans, including policies and guidance on trees and woodlands, have been considered?

Agree

- The council's strategy for trees needs a strong biodiversity strategic plan also to be in place as trees are part of the local biodiversity and contribute to the support of multiple non-tree species. Wokingham's current Biodiversity Action Plan (BAP) runs out in 2024. It is critical that the development of a new BAP needs to be planned and delivered in 2023 to be effective from 2024.
- A link to the 2022 Association of Tree Officers Trees and Telecommunication Guidance report <https://www.ato.org.uk/images/ATO-Trees-and-Telecoms-2022-web.pdf> should be included in the strategy to cover current best practice for balancing the needs of tree retention, planting and pruning with telecommunication equipment siting.

Q13 Do you agree that appropriate surveys have been carried out to provide baseline information on the number and value of the council's trees and help improve how it manages them?

Agree

- The **date** of the maps used for the i-Tree and the Blue Sky NTM surveys need to be stated so the baseline data can be dated for future reference.
- The I-Tree canopy cover includes shrubs, so will be overstating tree canopy cover.
- Appendix A shows an estimated number of trees by parish. The breakdown should also give the canopy cover by parish. The canopy variation across the borough is significant and it should be used to help with identifying priority areas for new planting. It would also help with the delivery and measurement of the stated long-term goal for increasing the canopy cover across the borough.
- Page 9 of Appendix A needs a factual correction to: 'Wokingham and District Veteran Tree Association (WDVTA) have been systematically surveying trees in the borough as part of the Woodland Trust Ancient Tree hunt. This volunteer survey has identified the presence of over 8.5k trees within the borough. The Ancient Tree Inventory has identified each surveyed tree as being ancient, veteran or notable. The WDVTA survey includes significantly more veteran trees than the 116 identified in this survey.'
- A section extending the analysis of issues, advice on management of existing trees and the planting of new trees to cover the 83% of trees not on council owned land would enhance the Strategy document. (Appendix A indicates that 17% of the borough's trees are on council owned land.)

Q14 Do you agree that the environmental and socio-economic benefits of trees have been taken into consideration?

Neither Agree nor Disagree

- The Cultural Heritage trees section on page 23 needs to include tree species where there is evidence for their historical economic use across the borough. For example the willows lining river and other water courses were pollarded and used in the osier industry in some parishes like Hurst and Ruscombe and the timber from the significant plantations of sweet chestnut trees was used for building.
- Page 23 also refers to boundary trees and states that there are no known ones in the borough. This is incorrect, there is a very well known one in Arborfield and in Ruscombe there is a boundary tree at the edge of the parish on all the roads (except one).
- It also does not highlight the exception high proportion of mature oak trees in the areas of the borough that were part of the Windsor Forest.
- The strategy should state that where there is a cultural link for specific species, that species will be considered for inclusion in planting schemes.
- Need to state where planting will be prioritised e.g. parishes with lower canopy cover (see Q13).
- Importance of riparian planting needs to be stated for wildlife value within the water course as well as along the waterside wildlife corridor.
- Include the potential for economic use of timber e.g. biomass production
- Health value of trees should promote local conservation groups where there is health benefit in belonging to such groups as well as the benefit of the outcome of the work undertaken.
- The Strategy should include an appendix with a list of local conservation groups relevant to trees.

Q15. Do you agree that enough detail has been provided on the definition, value and appropriate management of ancient and veteran trees?

Agree

No comments added

Q16. Do you agree that appropriate surveys have been carried out to provide baseline information on the number and value of the council's trees and help improve how it manages them?

Agree.

See comments to question 13 (the identical question)

Q17 Do you agree that the draft Tree Strategy is clear on the purpose of a tree preservation order (TPO), the process of applying for one and the procedure following a breach?

Strongly Agree

- The TPO flowchart (from the link on page 35) has communication back to anyone who makes comments at step 10 which is prior to TPO being considered, but no communication back to anyone who has made comments explaining the ultimate decision i.e. at step 12

and step 13. It is important to acknowledge, engage with and respond to people who have reasons for the TPO application and those who have reasons to object to the TPO.

Q18 Do you agree that the draft Tree Strategy is clear on the evidence required for issues relating to council-owned trees and subsidence, and how these should be handled?

Agree

- This is an informative section of the Strategy but a couple of paragraphs do not read smoothly and would benefit from clarification / rewording. These are the one beginning 'Before the Council...' on page 39 and the first paragraph on page 40.

Q19 Do you agree that enough detail is given on developers' duties to protect existing trees, incorporate new ones in their design processes and replant where needed?

Neither Agree nor Disagree

- As many trees are felled prior to a planning application being submitted for a site, the Strategy should require developers to increase the canopy cover as mapped at the date of the Strategy mapping process not from the tree survey submitted with the planning application.
- The strategy should be explicit and quantify the distance from the build line on new developments, for existing trees and proposed landscape planted trees.
- The permitted development rights should be explicitly removed for new developments on clay and other areas where the land is prone to subsidence.
- The closeness of trees to a proposed build line is a factor that must be considered in planning applications for proposed extensions and alterations to properties.
- Developers need to consider existing hedges as well as existing trees.
- Consideration is needed of future canopy pruning needs as well as tree root protection areas and planting distance from build line.
- The strategy must stress the responsibility of developers to maintain trees for at least the first 2 years and preferably for the first 5. WBC have a responsibility to monitor that this maintenance is undertaken.
- Developers need to be required to increase the canopy cover as well as deliver a biodiversity net gain.

Q20 Do you agree that the proposed replanting process for council-owned land and replacement stocking levels are appropriate?

Agree

- Many street trees have been lost over recent years. The strategy should be that these lost trees and 'street stumps' are replaced as well as replacing street trees that have to be felled in the future.
- The trees on the Green Routes should be replaced when lost. If the same species is no longer appropriate (e.g. oak on restricted space verges) then the strategy needs to specify what alternative species will be planted instead.

- Diversity isn't explained or stressed. Need the strategy to specify a plan for the replanting that will create the diversity required.
- Need to explicitly include that the replanting should be wildlife friendly species as well as UK sourced.
- Strategy should identify mix of species appropriate for each of the different towns and parishes, reflecting cultural heritage links.
- Strategy should set limits on the proportion of any one species that can be planted in an area over time, to aid delivering diversity.
- Species with a high carbon uptake should be identified as useful for areas of high pollution.
- Rewilding to be encouraged with private landowners.

Q21 Do you agree that the draft Tree Strategy respects and places enough importance on selecting the right species when planting trees?

Neither Agree nor Disagree

- The Strategy is missing the details and examples of the proposed species mix. When the short-term goal to develop this list is completed, the strategy should be updated so more details including species mix plans can be included.
- Does the council have a database of the council owned trees from which they can identify the current species mix by parish and by area type (street, open land, woodland etc)? If so, this would be a useful basis for developing the future planting species mix lists.
- Points already given to Q20 are also relevant here.

Q22 Do you agree that the draft Tree Strategy sets clear expectations and guidance around appropriate hedgerow planting?

Agree

- As well as a strategy for planting hedges, a strategy for the maintenance of hedges is also needed.
- Hedge trees or standards within hedges needs to be much more prominent in the strategy. These
- trees have a very high biodiversity net gain as well as significant aesthetic value. They are included right at the end of section 5, but it looks, feels and reads as a 'last minute inclusion'.

Q23 Do you agree that the draft Tree Strategy recognises the risks of pests and diseases to council-owned trees and outlines sufficient measures to reduce this risk?

Agree

- Ash die back is mentioned as a current tree disease issue, but it would be worth including current pests and diseases impacting oak and sweet chestnut trees which could have a big impact on the local tree population.

- The strategy should identify what species options should be used for the replanting when trees are lost to pests and diseases, e.g. species to replace lost or felled ash trees. The replacements species options may vary depending on the lost tree setting.
- The biosecurity measures included for council planted trees need to be adopted for all tree planting by developers planting within the borough, so the same constraints on sourcing etc apply across the board, otherwise developer planted trees might introduce a pest or disease.

Q24 Do you agree that the action plan's goals are appropriate to support the continued management and maintenance of existing council-owned trees and additional planting across the borough?

Agree

- See earlier points to Q21 for listing tree species.
- See earlier point to Q13 for the **date** of maps used to calculate canopy cover to give a base line from which canopy cover change can be measured.
- Many of the goals are not quantified and many do not make it clear how they will be measured and reported.
- Biodiversity Net Gain needs to be achieved on all developments whether on council or private land. A clearer statement on how BNG will be calculated is needed so the achievement of the BNG goals can be demonstrated.