

I refer to the Wimbledon Society's response to Stage 3 of Merton's consultation process (my email with 24-page Appendix sent on 06/09/21 to Future Merton) and in particular our comments on Site Wi3 - The AELTC Tennis Lands.

Some readers of our views may consider that there is a mismatch between, on the one hand, our strongly-held opinion that the golf course lands east of Church Road should be excluded from site Wi3 and should remain "open unbuilt parkland" and, on the other hand, our suggestion that the lands east of Church Road be given a separate designation (we suggested Wi3a).

We wish to make clear therefore our view that the golf course lands should be excluded from site Wi3. Any future use of the golf course lands should be solely for leisure or recreational purposes or as an open space and no building should be erected other than minor structures ancillary to such recreational or open space use. We consider therefore that there is no necessity to set up the golf course lands as a separate development site, as this may give the impression that we support intensive development of the site which we certainly do not.

Would you please read our earlier comments accordingly.

My intention in forwarding our Tree Strategy document was to present the Inspectors with an example of what could be produced.

Chris Goodair
Chair, Wimbledon Society Planning & Environment Committee

A TREE STRATEGY PROPOSALS BY THE WIMBLEDON SOCIETY 2:2022

INTRODUCTION

London was designated as the world's first National Park City in 2019. One result has been that the London Mayor now requires each Borough to plant (usually several hundred) trees each year until 2050.

From 2023, the Town & Country Planning Act will require a mandatory 10% net gain in Biodiversity Net Gain (BNG) in new development.

But many trees are being routinely lost to development, despite the well-meaning Policies in Local Plans, mainly because other Plan Policies (eg housing gain) are routinely given precedence.

Tree Warden groups across London are saying that we are losing more trees each year than we plant.

Many trees are also felled (and of course planted) without the local Council's knowledge or approval, as the sites are not within conservation areas, nor covered by Tree Preservation Orders (TPO's).

Developers have "gamed" the ineffective planning policies, replacing (felled) mature trees with saplings, which will take many years to reach the good-sized canopies of the lost trees.

Planning Applications continue to show deep excavations, foundations, and significant ground level changes within the highly vulnerable root and canopy systems of retained trees. This indicates either a lack of understanding, or a low level of competence, by some applicants.

Claims by developers and Councils that large numbers of new trees are being planted are misleading, as whips are being counted as a "tree": perhaps 50 – 100 whips = one tree?

Most Councils now need a new and more robust approach to trees and nature. With help from the public, they can ensure that the current tree loss is reversed, and the right new trees are planted.

We have all the information we need, so the emphasis should now be on proper planning policies and planting programmes, finance and action. We do not need more reports.

If we are serious about the importance of trees, what follows is a suggested way forward.

PLANNING

1. A new Policy in the Local Plan should be adopted to virtually embargo the felling or disturbing of veteran or special specimen trees on development sites. The current policies are clearly inadequate. If this impacts on (say) housing targets, then so be it.
2. A new planning Policy is also needed requiring all development to deliver Biodiversity net gain (BNG). Non-compliance "offset funding" needs to be set at a high enough level to prevent developers "gaming" the system and encourage the actual delivery of biodiversity.

Local biodiversity compliance and local delivery should be made more financially attractive than pseudo payments to off-site agri-business.
Local Nature sites and Commons could instead be recipients for additional biodiversity finance generated locally.

3. A Tree Years replacement Policy should be included in the Local Plan, where the combined age of any lost trees (as simply assessed by the Tree specialist and/or a Council tree officer) is reflected in the ages of the replacement trees.

The calculations should be:

For veteran and specimen trees (Oak, Cedar, Scots Pine, TPO etc) then lost years x 3:

For other trees in Conservation areas, then lost tree years x 2:

For all other trees, then lost tree years x 1.5.

If the development site is not able to accommodate all the new trees required, then the surplus is to be passed to the Council for planting on other local sites.

As an example, if 3 trees with a combined age of say 130 years are to be felled on a site in a conservation area, then their replacement trees would need to total $130 \times 2 = 260$ years, or say 26 ten year old trees, or 20 thirteen year olds etc.

The additional cost to developers is still very substantially less than the very high additional value created by felling.

(The CAVAT system should not be used in planning. Although very useful in determining (say in the Magistrate's court) the financial penalties for damaging a tree, the system is too expensive in time, too cumbersome, and concentrates only on monetary costs (for fines etc), not the wider aspects of a tree's value).

4. Councils should require tree root protection fencing and embargo zones on development sites to be clearly shown on the planning application drawings. If not satisfactorily shown, then a Condition should be applied to any permission requiring formal prior approval, before any site works commence.

Another Condition should require the developer to place a map of the trees and their protection zones onto the site hoarding, so that the public is able to see what tree works have been approved, and whether the approved plan is being followed. Site monitoring information from the public can help Council enforcement.

5. Planning Applications are too often accompanied by tree consultants' reports that are over-long, and that lack prescriptive proposals tied into the actual application drawings. Many say that such and such should be done, so have been written before the scheme has been designed. Tree Reports should say what is actually proposed and why.

What is needed is a map of where the trees are, what species they are, their height, what health they are in, their estimated age (see above), what is to happen to them, where their embargoed protection zones are on the site map, what ground level changes there are, where new replacement trees are to be planted, what size and species they are, what additional trees if any are to be presented to the Council for planting elsewhere (see above).

6. Councils should designate more TPO's, particularly in the less green part of Boroughs.
7. Councils should consider whether designating Article 4 Directions (outside Conservation Areas and TPO zones) are possible to bring some other tree works under planning control. No planning fees are required for tree works.
8. Details of all tree applications that involve felling should be posted on the Council website, as for other planning applications, so that the public can comment meaningfully.

9. Tree planning officers need to be in post to do the work. The existing system where a tree works application is (because of staff shortages) automatically approved if not 'contested' within 6 weeks, needs review.
10. Given that they have the expertise to deal with trees on development sites, it would be desirable to make the running of the major street tree planting programme (see below) the responsibility of the Planning team, leaving the Highways team to be responsible for the practical on-site implementation, and the running of the planting contracts.

ORGANISATION

1. Most Councils would need a small sub-Committee to oversee and monitor:
 - The operation of the Council's own major street tree planting programme:
 - The way in which trees are being lost and compensated for in the planning system:
 - The call to the public to suggest street tree planting sites, and encourage tree-buddy action.
2. This sub-Committee should meet only occasionally, to set targets, resolve any problems, give guidance to officers. Its main purpose would be to ensure that proper funding is provided in the Council budget each year, (normally approved in May) and that the Council staffing is adequate for carrying out all tree works. This is not about Committees, it is about enabling action and planting on the ground.
3. It could have a non-voting representative of the local Tree Warden Group.
4. It should press the case for trees to the planning policy and planning applications committees.
5. It should set out the standard Council definition of what constitutes a 'tree', eg being at minimum an Extra Heavy Nursery Standard, with a trunk girth of at least 14cm.
6. It should set down the required steps in a programme of work that involves planting several hundred trees each year. This is an essential - it's almost a military operation, and it needs proper organisation (*see below*).
7. This number is likely to be swelled by the surplus funding emerging from the proposed change to the way in which developers compensate for any tree loss they cause (*see above*).
8. The Council should select street trees to:
 - (a) fit the scale and character of the street, and the closeness to buildings:
 - (b) avoid as much as possible the purchase of cloned trees (disease vulnerability etc):
 - (c) create a range of biodiversity: noting that in the harsh and unforgiving environment of urban streets, with drying wind, poor ground, intrusive underground services etc, only robust species can establish.

A list of the species that are suitable should also take into account practical limitations such as subsidence/heave, maintenance requirements over time, disease resistance.

9. All street trees should be 'Heavy' or 'Extra Heavy Nursery Standard' size, having a minimum of 14cm trunk girth, with no branching below head height: never semi mature.
10. Councils should also:

- (a) arrange a free mini-tree scheme for householders to plant in their own gardens, utilising stock from outside sources as these become available:
- (b) Involve the public/local groups in an organised way to suggest multiple sites for street tree planting every year:
- (c) Involve children and local people in “happy planting” schemes:
- (d) Produce simple one page local handouts for the public on:
 - which trees to select and which to avoid in your garden:
 - how you can look after your local street trees, and put mini plants around them:
 - keeping your hedging from encroaching on the pavement:
 - summarising how the Council needs to undertake tree works to ensure public safety, protect property, maintain sight lines, ensure that street lights can function, avoid encroaching on residents’ property, prevent crossovers if trees are impacted, and when land owners are required to cut back overhanging branches.

THE ANNUAL STREET TREE PLANTING PROJECT: A BASIC WORK PROGRAMME?

For such a large tree planting programme, a very significant amount of work is involved, and needs to be planned for.

Individual Councils will obviously have their own detailed approach, and in essence the work can extend over almost a whole year. Purely as an example:

February to April	<p>Council asks the public to suggest sites for tree planting in streets: Concentrating on the less green parts of the Borough:</p> <p>Assemble the basic list of tree planting sites in individual streets, from the ideas coming from both the public, and from within the Council: If 700 is the likely eventual total, then over 800 potential sites may be needed, as detailed site surveys/inspections etc may rule out many:</p>
March to April	Officers include the tree planting budget for say 700 trees in the financial estimates:
May	Council agrees the budget allocation for tree works for the coming year:
May to June	Electrolocation surveys of every individual potential street tree site, with underground services marked on pavements: The result is the List of the selected c.700 sites, together with an indication of suggested species:
July to August	Officers visit tree nurseries to block-purchase specific tree stocks: all being Heavy or Extra Heavy Nursery Standard size for streets:
January	Nurseries deliver ‘containerised’ trees to the Council’s holding depot:
January to February	Council Contractors undertake planting in the selected streets and sites, together with stakes, water tubes: tree guards, floor grilles and commemorative plaques where needed. Hand delivery of local “help your tree” A4 handouts to residents near new street trees.
Spring & Summer	Maintenance watering of newly planted trees for at least first years.