

**A Response to
Islington Council's Consultation
on the Draft Tree Policy**

by Highbury Community Association



4th February 2010

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Highbury Community Association

The Highbury Community Association (HCA) was formed in 1997 to reflect and assist residents' concerns on many different aspects of living in this area of North Islington. The HCA now represents around 1,000 residents and businesses in Highbury, Lower
5 Holloway and Finsbury Park. It is run by a committee of volunteers and relies on donations and advertising revenue for funds.

“Highbury Community News” is an A4 sized black and white publication, usually six pages, produced approximately five times a year. It contains items of interest for those living or working in Highbury, including news, local history, profiles of local
10 people, reviews and articles submitted by members.

The HCA has a history of being involved with trees: it contributed to the development of the Council's initiative, “A Vision for Highbury Fields”, 2007, and published jointly with Highbury Fields Association the book, “Highbury Fields Trees”, 2008, which is now hosted on the HCA website, <http://www.highburycommunity.org> ; it is a study of
15 the trees and of their relationship to the design of the park as a whole.

1. General observations

The consultation process

There have been two, avoidable, procedural problems with the consultation.

First, the consultation spanned Christmas and New Year. This should be avoided for
20 any consultation, otherwise an extra two weeks should be added to the usual consultation period. Responding to a substantial document requires a lot of work but, more especially, one cannot contact other people during the holiday period – they are on holiday and this includes colleagues, specialists and even Councillors. We understand there have been several requests for extensions to the deadline for responses
25 to this consultation. We are pleased that Councillors have agreed to an extension. This conflict with the holiday period has been a difficulty we have experienced with some previous consultations and we ask that it be avoided for future consultations.

Second, a consultation on a substantial matter such as an important local authority policy must *precede* the ratification of the final policy *by the relevant Council Committee* at a public meeting; in this case it is the Executive Committee. It had been planned that no report on submissions to this consultation would be made to the Executive Committee, and that the final version of the Tree Policy would not be put to the Executive Committee for possible further amendment and final ratification. HCA took the view that this procedure prevented electors from both lobbying Councillors on the final draft and from holding Councillors to account for the final decision – in other words, the consultation was not following a proper democratic procedure. We are pleased that, on making representation to Councillors, they took the decision to arrange for the Executive Committee to ratify the Tree Policy in the way we consider is normal practice. This has been a difficulty we have not experienced in any previous consultation and it should be avoided. We take this opportunity to ask that this difficulty will not arise in future, otherwise we will see no purpose in responding to a consultation on a substantial issue.

Consultation statistics

When the consultation's statistical information is compiled and reported on by Council officers following receipt of all responses to this consultation, we ask that the statistics allow for a different weighting for submissions by groups and organisations from those made by individuals. We recall that the statistics in the report on the "Vision for Highbury Fields" consultation, made to East Area Committee in 2007, did not make such a distinction. It is the Highbury Community Association that has produced this document and it would be misleading, in HCA's view, if a report on this consultation did not to distinguish the number of submissions made by groups from the number of submissions made by individuals.

The Tree Policy

"A Policy for Trees in Islington", (the Tree Policy), should state as simply as possible *what* the Council aims to do, *why* it has made particular choices and *how* it will achieve its objectives.

30 What: aims are encapsulated in the range of policies adopted.

Why: reflects the Council's response to the wider context – political, social, scientific, etc. – and to Borough interests.

How: demonstrates the range of strategies and action plans already developed and to be developed in order to implement the policy.

- 5 A Tree Policy should be a practical, manageable document: it should be clearly structured, written in plain English and well laid out; the reader should find it easy to locate answers to a short list of fundamental questions:
1. What is the policy context and the scientific context?
 2. What are the objectives of each policy?
 - 10 3. What are the reasons that give rise to each policy?
 4. What are the policies the Council has actually adopted?
 5. How will each policy objective be delivered?
 6. What are the perceived constraints in implementing the policies and the strategies for overcoming the constraints?
 - 15 7. What processes will be adopted to involve the community at each stage?

The Tree Policy should also give answers to how progress will be monitored and give details of the arrangements for making reports on progress at appropriate intervals, including procedures to record recommendations for changes to the Tree Policy.

HCA has found that the approach taken by Newcastle City Council, "Britain's
20 Greenest City" for 2009, has provided clearly structured Tree Policy, Action Plan and Tree Management sections in its published material and that this material is well written and well presented for the the local community audience.

Documents may be found at <http://www.newcastle.gov.uk/core.nsf/a/conservetrees> .

The length of Islington's policy document is not the main issue, long though it is and
25 important as it is to be concise, but It is questionable that the draft Tree Policy has achieved a necessary level of clarity in its structure as a document and clarity, accuracy and completeness in content.

We envisage a document as compact as possible, but with scope for complementary material to qualify or expand upon the main text, this to be included in additional appendices, cross-referenced in the main text.

Because the Tree Policy appears to have a number of different functions, it should
5 make clear distinction between actual policies and how policy will be implemented.

For example, some policies might be directed from the centre, others on a decentralised basis – in other words will policy implementation be one-size-fits-all or will options and variations be available on an Area, Ward or location basis?

A major difficulty in responding to the draft Policy is that the draft appears to have
10 been written by several hands and without strong editorial input to structure common themes and remove contradictions and ambiguities: we believe this problem could be relieved by applying the list of seven questions above, a process that would pull together all elements of individual issues to help the reader fully to comprehend, for example, the Council's criteria for the felling and removal of trees, a subject men-
15 tioned at several stages of the draft. However, the draft fails to offer a comprehensive range of reasons for felling and removal of trees at a single place anywhere in the draft and the draft includes reasons for felling and removal which are vague, in some cases, and apparently contradictory in others.

There appears to be a lack of clarity in the structuring of statements about the trees
20 actively managed by the Council and trees in private ownership. It would relieve some of the confusion in the document to clarify which policies and objectives apply to all trees in the Borough, which are applicable only to public trees and which deal solely with privately owned trees, and to rearrange the main text accordingly. It is assumed that such different elements of the Tree Policy as public and private cannot
25 be satisfactorily combined. Ensuring the sections are more clearly separated would make them clearer.

We ask that a graphic symbol indicating community involvement be used as a flag in

the margins to show where in the text public involvement is possible and encouraged – a symbol such as:



5 Inevitably, the Policy will address the problems associated with trees; however, the draft Policy makes some heavy weather of this and at several points may be taken to imply that trees are such a problem we might regret we have them: this is most definitely not the impression to give and a different, more positive approach should be taken so that a sense of pride in our trees emerges throughout the document, irrespective of the seriousness of any tree-related problem.

10 For these reasons, we make our recommendations in a number of separate sections; these deal with the structure and the content of the draft Tree Policy.

2. Structure and content of sections 1 and 5 of the draft Tree Policy

Why we have a tree policy

15 A more engaging title than “Introduction” for the initial section of the Tree Policy, might be “Why we have a tree policy”. “Introduction” is a heading placed where the attention of the reader should first be grasped and not be allowed to drift away under a desire to find more seemingly interesting headlines. Why we have a tree policy might include an evaluation of the Tree Policy that is being replaced, including some of Islington’s more significant achievements in supporting trees in the last decade.

20 Policy context

25 However, we would prefer much of the present content of the draft “Introduction” to be merged with the draft Section 5, “Policy Context”, and that this section of the Tree Policy be very substantially developed. At present the section on policy context is all but bare; this is a serious omission because policy context should be the spring from which most of the adopted policies flow. We regard this context as extremely important. In the content for this section, proposed below, texts from the draft

“Introduction” have been included where we thought it appropriate. Our suggested text for the “Policy context” section is shown here in the indented paragraphs. Words in italics are direct quotations from the draft Tree Policy that are related to policy, with the original paragraph numbers shown in parentheses.

5 **5 Policy context of the Tree Policy: Political, social and environmental; the importance of scientific research**

10 *This document is a revised version of the original Islington Tree Policy, first drawn up in 1992 and then revised in 2002. Much has changed in the intervening time (1.1).* Important publications of recent years show how conclusions drawn from discoveries made through scientific enquiry have been incorporated into national and international efforts to support trees and forests; a few sample quotations from these documents are included in the listing below.

15 The new term “urban forest” gives a label of greater significance to trees in the urban environment, and aims to show individual trees and tree groups as amounting to more than the sum of the parts. *The need for a holistic policy is now stronger than ever (1.1).* The Council *is committed to improving the urban forest and ensuring that it is managed in a sustainable way (1.3).*

20 Simply put, trees are both valuable and vulnerable. They are of value socially, culturally, aesthetically, economically and environmentally. They are vulnerable because they are living things; like human beings they can succumb to disease and to other natural forces and, in particular, they are exposed to damage *by* human beings. The Tree Policy explains current thinking and it demonstrates ways in which we may retain the existing value of trees and increase that value through working together in making general improvements to our environment, by protecting existing trees and by planting more trees.

25 The Tree Policy shows how the Council's duty of care for trees links to the desires of the community to have contact with trees in daily life and how its duty will be carried out in an ordered way. Everyone, from resident to developer,

5 should know where they stand, what they can expect of the Council and why the tree policies and specific action plans for trees can pass the test of being reliable and realistic in a time of change. It is a vision for the future of trees in Islington based on direct experience and the advice of professionals working with trees in many different capacities.

10 Because trees are important worldwide, the context for Islington's Tree Policy ranges from the international, through European, national and London Region policies to the policy for this borough, which includes detail down to local level where it plans to engage members of the community in hands-on activity. Indeed, far from being a top down policy, the Tree Policy recognises local interests from the start and aims to engage in many ways with local people, giving opportunities for residents to work within the terms of the Tree Policy to secure the trees they want and to give the trees continuing, practical support. By building on local initiatives the Tree Policy becomes stronger and more effective, 15 *creating a real improvement in the quality of life for the people of Islington, for the enjoyment and enrichment of current residents and visitors and for future generations (1.8)*. What really counts is how the policy is implemented; local consultation can greatly influence policy implementation when communities are galvanised into action.

20 **Policy documents and the legal framework**

The purpose of this document is to amplify this Council's tree policy as outlined in the Unitary Development Plan (UDP) and to unify the treatment of all trees in the Borough, whether they are on Council or private land. It seeks to ensure that all trees make the best possible contribution to the environment of those who live and work in Islington (1.1).

25 This document may be found at

<http://www.islington.gov.uk/html/udp/udpintro1.htm>

The Council has achieved beacon status for climate adaptation and has produced a Climate Change Adaptation Strategy in which the Tree Service is a key

stakeholder which has a number of current and future initiatives it directly or indirectly involved with. [sic] (9.4.1)

This document may be found at

http://www.islington.gov.uk/environment/sustainability/sus_climate/adapting_climate_change.asp

5

The tree policy supports the aims in the Forestry Commission's good practice guidance on managing woodlands with bats, which are in Appendix G. It is important to recognise that these should not only apply to woodlands, but to the management of the entire tree stock. (11.3.3/4)

10 *Urban foresters in Islington have adopted the following mission statement, "We will protect, promote, care for and improve Islington's Urban Forest by managing the trees for the long term benefit of the community." (1.4)*

15 The Council's work with trees is supported by the adoption of recommendations provided by current British Standards, the two most applicable being BS 3998:1989, "Recommendations for Tree Work" and BS 5837:2005, "Trees in relation to construction – Recommendations". (27.6.2)

20 Beyond this, there has been an important array of publications produced by Central Government, the Mayor of London, and other national and London-based bodies since the last revision of the Tree Policy. The focus of a great proportion of research and guidance in these publications is climate change, global warming and the heating effects of greenhouse gases, of which carbon dioxide is especially relevant: trees trap it as they synthesise food directly from carbon dioxide using energy from light – photosynthesis. A few of the publications are listed here; all have fed into the Council's Tree Policy.

25 Mayor of London, "Connecting Londoners with Trees and Woodlands: A Tree and Woodland Framework for London", March 2005.

"Overall, the sites and species for new or replacement planting need to be

considered with care to ensure problems are minimised yet ensuring the trees will make a positive contribution to the landscape. Existing street and garden trees should be retained wherever possible through management, with removal considered only as a last resort followed immediately by replacement with appropriate species in an appropriate location.”

5

This document may be found at

<http://www.london.gov.uk/assembly/reports/environment.jsp>

London Assembly, “Chainsaw Massacre: A Review of London’s Street Trees”, May 2007.

10

“Where once there were broadleaf trees providing ample shade, there may now be smaller ornamental trees. This report examines how London’s treescape is changing and makes proposals to protect and promote London’s arboreal treasures.”

This document may be found at

15

<http://www.london.gov.uk/assembly/reports/environment.jsp>

The Department for Communities and Local Government, “Trees in Towns II”, February 2008.

20

“The replacement of one large, native tree with two trees of a relatively small, ornamental cultivar is likely to have a negative environmental impact – providing significantly less biodiversity and aesthetic value [...] The importance of mature and ancient trees in urban areas is undeniable and local authorities responsible for their management must balance public safety against their responsibilities for protecting and enhancing the environment [...] The highest proportion and density of trees making an outstanding contribution was recorded in open space plots”.

25

This document may be found at

<http://www.communities.gov.uk/documents/.../pdf/treesintownsii.pdf>

The Trees and Design Action Group, “No Trees, No Future”, November 2008.

“Large species trees confer the greatest benefits on urban spaces. If larger-

growing trees are not incorporated as essential elements in new developments, the result will be a degraded and impoverished landscape that will also fail to deliver essential adaptive responses to the effects of climate change.” Islington’s Tree Service contributed three of the case studies in good practice for trees and development appearing in this report.

5

This document may be found at

<http://www.forestry.gov.uk/...no-trees-no-future.../london-tdag-no-trees-no-future-with-cs.pdf>

The Woodland Trust, “Position Statement: Trees and their role in carbon management for land and business”, June 2009.

10

“Carbon dioxide (CO₂) is the most prevalent of the greenhouse gases (GHGs) that are driving climate change [...] Global deforestation accounts for around 18 per cent of all GHG emissions, more than the entire transport sector combined.”

This document may be found at

15

<http://www.woodlandtrust.org.uk/.../pdf/carbon-management-policy.pdf>

Legislation, primarily the Highways Act 1980 and the Town and Country Planning Act 1990, in conjunction with Planning Policy Guidance notes, Circulars and Supplementary Guidance issued by Central Government, inform and empower local government in the care and management of trees. (5.1)

20

Insert links

There are many systems developed for valuing trees. Islington’s adopted system is the Capital Asset Value for Amenity Trees, CAVAT, (see Appendix n). It is the system that the London Tree Officers Association (LTOA) has adopted to work in conjunction with their Risk Limitation Strategy for Tree Root Claims; 3rd edition 2007. (13.2, 14.9). The Council works to the Joint Mitigation Protocol (JMP) & LTOA Evidential Requirements For Trees when assessing subsidence claims, (14.16), see Appendix n. Further reference documents are listed in the Reading List, Appendix _.

25

3. Omissions from the draft Tree Policy

The draft Tree Policy appears to omit or has a less than sufficient response to a number of important issues. This includes:

Policy context

5 (dealt with in 2. above)

Details of the range and numbers of existing tree species in the Borough

There is no information on the breakdown of trees into type or species. This is important for an understanding of the current tree stock. If the data are available, it would be helpful to see how species numbers have changed in the period following the first Tree Policy, the 2002 revision and now, including the numbers of large-growing, broadleaf trees. It would be satisfactory to have the data placed in an appendix.

Details of tree species generally favoured for new planting

The 2002 version of the Tree Policy included lists of tree species the Council looked to plant as appropriate types of tree for different types of location. It is unfortunate that this is omitted from the draft Tree Policy and we ask that it be reinstated and updated. The draft policy shows an intention of planting native species; we would like to see these listed. It would be satisfactory to have these lists placed in an appendix.

Details of trials of tree species new to the Borough

Again, range of species and numbers should be given for this group. What species have been added since 1992 and 2002, and at what locations or in what circumstances? What species is it intended to introduce in the foreseeable future? It would be satisfactory to have these lists placed in an appendix. We are familiar with the trees that formed pollution resistance trials, trees that have grown up over fifty years or so into a small but significant arboretum at Highbury Corner, which is also a very attractive landscape feature. In planning new trials, we hope that forethought can be given to identifying a similar location – one where trees will be relatively inaccessible to the general public and may be planted in close proximity to one another.

Identification and appreciation of arboreal treasures: Survey of notable trees

An endangered species, the native black poplar, discovered growing in Joseph Grimaldi park, has been recognised with its own Action Plan, which is included as an appendix to the draft Tree Policy. However, it is not only rare species that are needy
5 of action plans to save and promote their continuing existence; large, native, broadleaf species and species that Londoners feel are of a similar importance to native trees, such as the London plane, are in need of special consideration, as indicated in several of the policies and guidelines listed in our suggested "Policy Context".

10 It is not only individual or landmark trees, (landmark trees are referred to in draft Policy, paragraph 4.4), that are at stake here; in the case of several species, and most notably the London plane, there are whole groups of trees that are of special value as notable elements of the landscape. These groups include, for example, the interlocking avenues of plane trees on Highbury Fields, the avenues of planes in
15 Highbury New Park and Rosebery Avenue, the collections of planes in various squares and gardens such as St Mary Magdalene Gardens and Percy Circus, and the group of three, impressive planes in Canonbury Square. The lime trees along the north side of Barnard Park, the horse chestnuts in Highbury Park and the lime trees in Highbury Place form significant rows of trees. There are more recommendations on this theme in Further Action Plans, below.

20 Some of Islington's trees have been identified as being Great Trees of London – the Barnsbury Beech, (unfortunately, now felled and removed) and the Amwell Street Fig. We believe there would be value in creating a Borough list of notable trees; the Joseph Grimaldi park black poplars and the great planes in St Mary Magdalene Gardens would be obvious examples, but there may well be many more special trees
25 or groups of trees in the borough and identifying them could add to the public's pride in its trees. This is something that could be recorded and maintained in the Tree Service database. We recommend that the EzyTreev database be customised to record such arboreal treasures.

Additional action plans

The London plane

As the iconic tree for London, the London plane has a special place in our history and the “cultural landscape” of the capital. It is not the most numerous tree in Islington –
5 there are greater numbers of lime, ash, rowan, cherry and maple – but it is a very prominent, large and glorious tree with an extensive canopy; it is particularly suited to the difficult conditions trees face in towns and is one of the species expected to have the potential to cope with climate change. Many planes are well established, having been planted throughout the Victorian era; they are expected to continue growing
10 well into the next century. They are capable of living for at least 350 years before reaching an over-mature phase. The extent of their longevity is unknown as the species came into being only in the 17th century. To retain this well-loved feature of the landscape, it is necessary to plan support for our existing planes, to continue planting new ones to replace any that have to be removed and to find new, suitable locations
15 for planes. An Action Plan is required for the support of the London plane.

“Greening” new spaces

HCA understands there are areas of the borough or individual streets that have few trees. This is alluded to in the draft policy but there is no detail of such locations. A clearer picture of where tree cover is particularly sparse and where trees would be
20 desirable – always providing such new planting is feasible in the context of each location – should be presented in the Tree Policy. It is likely that a “greening” action plan would be appropriate.

Trials of new species

An action plan for this group would be helpful and informative and might form part of
25 the appendix of tree species HCA suggests for inclusion in the Tree Policy, see above.

Research into tree species in the Borough

The black poplars are an instance of the value of research in promoting interest and commitment to a small group of trees of an endangered species. There are other

possibilities, too, for research. Such research might well form part of individual action plans.

At Highbury Fields there is a considerable collection of London plane trees dating from the Victorian period and of particular interest because of the variety of forms within this species. We understand from corresponding with tree professionals, (we are especially grateful for the advice of Mr I M Chengappa whose website is devoted to plane trees, <http://www.aranya.co.uk/planes>), that there is considerable diversity in the parent plane species, so there is also potentially considerable genetic diversity among the hybrids. Without DNA examination it is difficult to say how much this has been passed into the common clones. Note that some clones (Pyramidalis, and to some extent Augustine Henry) resemble the occidental plane, and others (Hackney) resemble the oriental plane. Most of London's 20th century and later plantings probably belong to no more than two clones. Much of the genetic diversity that there is in London dates from the early plantings, 19th century, before the nursery industry settled on supplying only the forms they found easiest to raise.

The Defra publication "England Biodiversity Strategy Climate Change Adaptation Principles" has some relevance here; for example, "The ability of a species to adapt to change is correlated with genetic diversity and population size, so conservation should seek to maintain or create large populations".

Highbury Fields should be regarded as valuable for London's stock of plane trees, since it contains some mature trees of some clones that are not common or, possibly, not even found elsewhere in London. Among these unusual clones are some trees by Highbury Crescent near Ronalds Road and elsewhere. These can be compared for shape, etc. with the commoner varieties also found on the same site (such as the Pyramidalis), which would be especially useful since it can be assumed that they are of similar age. A proper study of these trees could become valuable for maintaining the diversity of the plane stock in London through propagation. We recommend this idea be explored as part of a London Plane Action Plan.

Achievements flowing from Tree Policy 2002

It would be well worthwhile to blow the Council's trumpet in a section demonstrating the value of the Tree Policy as a result of significant achievements that have flowed from the 2002 policy. The "Introduction" might be a good position for this information.

5 Changes made to the Tree Policy 2002

A section highlighting the main changes and developments in the 2010 policy would demonstrate the effectiveness of monitoring and assessing the 2002 policy and how this has led to specific changes. The draft Tree Policy is intended to be an improvement on the 2002 edition but this quality is hidden unless it states *how* it is better
10 than in 2002.

Checklist of policies

It is important to add a listing of all the policies at the beginning of the Tree Policy or as an appendix, as was done in the 2002 edition.

15 More robust policies in defence of trees: existing trees, CCTV, pruning, felling, etc.

Tree felling and removal is dealt with separately, below, but there is scope and, we would argue, a need to make a stronger, clearer case in favour of both existing trees and new planting in circumstances where there are known to be conflicts of interest.

Trees and development control and determination of planning applications

20 New development, and particularly at the larger sites, should be required to include the planting and maintenance of large-growing, broadleaf trees, always providing the soil conditions are or can be made suitable. The draft Tree Policy should be more assured, more demanding, in expecting and requiring developers to undertake this type of planting and for architects and structural engineers to make provision for the
25 growth of saplings into large trees, with minimal pruning required as the trees grow. There is a long tradition of residents living with large trees and, though there are problems with foundations in some older buildings, modern structures, if properly

designed, can be expected to accommodate such trees. In this sense, there has not been such an opportunity for centuries safely to plant large-growing trees.

HCA feels that some good opportunities have been lost in recent years; while there is some fine new planting of trees at the entrance to the Emirates stadium, there could
5 be more – and more substantial – street trees along Drayton Park, in Avenell Road outside the new development of the old Arsenal stadium, and within the area of the Arsenal development between Holloway Road and Caledonian Road, for instance.

Enforcement and monitoring

As is often the case, enforcing policy is difficult; with trees it is especially difficult as
10 damage to trees cannot be undone. HCA would like to see a statement about the importance of enforcement as a means of protecting trees as well as being a form of punishment. HCA would like to see a statement about the value of local community or environmental groups being involved in protecting trees and an idea of the ways in which the Council will encourage and facilitate this interest.

15 We suggest a system of structured review of the implementation of the Tree Policy is needed. Reviews would look at the effectiveness of all areas of tree policy. Initially, a review of work with trees in the last five years would be a good starting point. It may well be that this review has been done; making it easily accessible to local people would be helpful. The draft Tree Policy does not appear to address the issue of the
20 effectiveness of the Tree Policy as a whole.

4. Clarifying the structure and condensing the main text of the draft Tree Policy

We are conscious that the recommendations for changes and additions to the draft Tree Policy in this response add to the current number of pages. There are a number
25 of ways in which the present text could be reduced in size:

- Cut much of the inessential, discursive text from the body of the Tree Policy, possibly placing it in additional appendices;

- Put more of the technical information into appendices;

Re-arrange some of the issues so that repetition, of which there is a considerable amount, is avoided or reduced.

5. Additions to the list of appendices contained in the draft Tree Policy

- 5 Section 11 of the draft policy, on bats, demonstrates a lesser-known importance of trees and it is very welcome as an additional protection for trees as well as bats. However, it is a long section in the draft policy and most, but not all of this would be more appropriately placed in an appendix.

Opportunities for additional appendices are indicated elsewhere in this response.

10 6. Tree felling and removal

Except for consideration of paragraphs 7.1, 23.1.4 and 23.1.5, discussed in the “Paragraph-by-paragraph” section below, HCA’s comment on tree felling and removal in the main text of the draft Tree Policy is brought together in this section. Similarly, we make comment on Policy 8 in the “Policy-by-policy” section below.

- 15 HCA has found reference to tree felling and removal in many paragraphs; conflicts appear to exist between some of the statements. For example, paragraph 19.2 contains largely acceptable reasons for felling and removing trees, (the query being that root decay is not, apparently, investigated as deeply as roots are when subsidence claims are made, and strong evidence should always be sought under circumstances
- 20 where root decay may lead to felling and removal of a tree). However, Policy 8 is far more loosely – and unacceptably – drafted and includes other reasons for felling and removing trees. As just noted, we make our recommendations on this in our section 8. “Policy-by-policy critique of the draft Tree Policy”.

- 6.3.1 Assurances should be included in this section that none of the “challenges”
- 25 listed in the bullet points will lead the Council to fell and remove a tree.

7.6 This comment is unsupported and should be withdrawn or amplified or referenced to another paragraph that does amplify it sufficiently. It cannot stand alone in this form.

8.1.1 “Maintenance: To undertake the management of the existing stock ensuring a continuous programme of tree replacement throughout the Borough. This will create a mixed range of age and species ...”. This paragraph must make clear that existing, healthy trees will not be part of the replacement programmes. Also, that in making replacements, due attention will be paid to the existing design of sites which have a distinctive character due to the species currently existing, such as Highbury Fields and its interlocking avenues of plane trees, and that such design features which depend upon a specific species will be maintained.

8.1.2 This must clarify that the Council will not fell and replace healthy, mature trees.

10.4 “Although native trees are not suitable for planting in the street setting”. Paragraph 22.1.5 raises no problems associated with the planes and limes growing in several streets it lists. These are traditional street trees and are amongst the tree species most to be supported in the reports mentioned under our “Policy Context” section. It seems unreasonable, therefore, to refer to them in 10.4 as “unsuitable” as these species are well adapted to being managed by pruning and have shown themselves to be successful urban trees over a period of centuries.

12.5 - 12.7 HCA agrees that the Raywood ash is not a tree with a strong structure; however, there are no details of damage or of the total number of instances of damage to people or property, since, say, 2002, whereas we note, for example, that there are large Raywood ash trees growing successfully at the Blackstock Road end of Highbury Park and adjacent to the Brunswick Centre on Bernard Street, WC1. We are not wholly convinced that this species is as dangerous as the draft Tree Policy makes out.

14.15.1, the related, boxed summary: “Publicly Owned Trees”, bullet point 3: this

reason for felling and removing healthy trees is at odds with paragraph 19.2. The statement, "areas predisposed to building movement" is quite different from "Where a tree has been positively implicated in a subsidence". It appears also to be inconsistent with the last bullet point of Policy 11, "The Council will not consider the removal of trees for [...] The perceived risk that it will cause subsidence in the future, where there is no actual damage". Thus the statement in 14.15.1 should be rewritten to comply with the position taken elsewhere in the draft policy. Note: Does EzyTreev currently plot incidences of subsidence that might show fault lines in the borough to inform future tree planting strategies?

10 17.1 CCTV It is a political decision to install CCTV. It is not certain, we hope, that CCTV will thrive and expand as it has done so far. Either way, and especially in the event of more CCTV, the Tree Policy must be strengthened against its encroachment on trees. It is important that the the Tree Service challenges the *need* for and *benefit* of CCTV. Given the UK has already more CCTV than anywhere else, we do not
15 accept it should be allowed to encroach even further onto the amenity benefits trees provide.

17.2 CCTV This appears to add another possible reason for the felling and removal of healthy, existing trees: "If consent is not gained" indicates there *is* a possibility of the removal of a tree. This should be rewritten to exclude such a possibility. Amend, also, "must" to "will" in the following sentence, "And priority *will* always be given to trees with high value". High value is not defined and should be clarified. BS 5837:2005 assumes any healthy tree to be worthy of protection if it has a life expectancy of more than 20 years. We seek this as one of the criteria for high value in respect of CCTV installations.

25 19.2 "Diseased trees – trees identified as having a disease that will lead to the death or significantly affect the structural soundness of a tree to the extent that it is considered dangerous". The word "identified" needs detail of how this has been done and evidence that treatment to secure the life of the tree will not be possible. This may require a reference to a statement located elsewhere in the Tree Policy. Also,

the list of reasons for felling and removal should include stand thinning, cross-referenced to 19.3.

19.4.3 Should add to the notification list, community groups that have contacted the Council showing their interest in tree matters. Highbury Community Association is
5 one such group and wishes to be notified for trees covering the area of the East Area Committee.

19.4.5 Consultation via public meeting. Is this a formal meeting for Councillor decision? If not, will a report be presented to the appropriate Area Committee? We believe this should be the case for the reason given in 19.4.5.1, "exceptional amenity
10 value". It is insufficient to rely on the outcome of an informal meeting such as we understand from 19.4.5 and the paragraph should be amended.

19.4.6 This paragraph should be deleted. The topic is dealt with in HCA's comment on paragraph 19.4.5, above.

19.6.1 State the meaning of "In these cases consultation in line with the above con-
15 sultation guidelines". It is not grammatical and lacks content and cross-reference.

22.1.6.3 "Although it would be highly unusual, it is possible for a street tree to be placed under a Tree Preservation Order (TPO)." Unpack this statement and give more information. How can such an Order help in the case of street trees? Is this relevant to Council trees in connection with other agencies or a body such as TfL? With
20 EzyTreev accessible to all Council officers, we could expect there might be some instances where such an Order on a Council tree will be helpful in providing easy access to the information and removing any uncertainty staff in other Council departments might have – for example, for estates no longer managed directly by the Council where trees may be damaged or felled inadvertently. The powers of an
25 Order, as detailed in 26.6, suggest this might be a useful tool and the Council and general public have experience, no doubt, as to where additional sanctions against potential threats to trees may be useful. This would include circumstances detailed in

paragraph 27.1. Also, yearly targets for renewal of and additional TPOs should be set out in the Tree Policy.

24.2 Add a reference to the end of the final sentence, e.g., “as set out in paragraphs XX”.

5 26.6.3 “Will be given material consideration” is hardly a strong statement of the Council’s determination not to allow the felling and removal of trees. All trees, whether “conserved” in some way or not and whether under the management of the Council or privately owned, must be given strong protection within the planning process. This applies to all development, large or small, private, public or a mixture of
10 the two.

27.9.2 The phrase “were agreed for removal” is worrying. We have noted cases of felling and removal that were, presumably, agreed for a large development – such as the example, in an instance outside Islington, where the loss of a large pavement tree on St Giles High Street, WC2, has brought about diminished amenity benefit in
15 that local area. We would like to see a tighter text in this paragraph to show the Council will not allow felling and removal except under the most extraordinary circumstances. A clear requirement of developers, that the recommendation of BS 5837:2005 that tree matters should be clarified before development design takes place, is crucial. Often, this recommendation seems more honoured in the breach.
20 Design can accommodate trees if there is a will. In these circumstances, it will often fall to the Council to have that will. HCA has noted the Council’s work on projects that became case studies in “No Trees, No Future”.

27.13.1 HCA prefers active notification to passive notification. Community groups with an interest in trees, such as ours, are all likely to prefer being informed directly
25 by officers of pending applications to fell and remove trees. It is unreasonable, given existing technology, to ask that groups with this interest should have to mount regular searches of a register to gain the information they need for their area.

30.5.4 “the individuals concerned” are presumably officers. If this is so, replace “individuals” with “officers” or make clear who such individuals may be.

7. Tree pruning

This subject appears in many sections of the draft Tree Policy. We recommend a relatively short, separate section, perhaps located close to a tree felling and removal section, to pull together all general principles of pruning of trees: standards of pruning, pollarding, the dangers to the tree of incorrect pruning, root protection, the need for pruning, the need for consent, the need to resist unnecessary pruning, resistance to the call for CCTV pruning, pruning and new development, enforcement, the Council's general practice including the aim to prune as little as necessary to allow the tree to grow to its natural form as far as that is possible in an urban environment, etc. Also or alternatively, the indication, by cross-referencing, that these issues are indeed covered in some detail in the appropriate places in the Tree Policy or in an appendix. More could be included to show how the Council consults “Friends Groups” on tree pruning. Just as we ask that felling and removal notification be sent directly to interested community groups, we ask that groups be consulted on the details of the yearly planned pruning regime before it has been finally determined.

20 The section “Maintenance techniques” would be more appropriately entitled “Pruning techniques”.

20 20.2 Crown reduction HCA understands and accepts that this is an essential aspect of protecting some houses from possible subsidence. Beyond that, the preference is for permitting trees to develop the forms that come naturally to the species; crown reduction sometime encourages growth and blocks light to housing more than if the tree were allowed to grow more naturally. We recommend that crown reduction be
25 kept to a minimum and certainly not be a “default setting” in the pruning cycle.

20.4 Crown lifting HCA understands and accepts that in most circumstances the lower branches of a tree will probably need to be pruned, if only to prevent vandalism

to a tree. However, there are instances where trees have been pruned to a “lollipop” shape and we wish this to be avoided in all circumstances, including for CCTV.

27.6.1 Many instances of excessive pruning must be happening. “Will be considered” for refusal is too weak – unless the Council has no powers to determine or enforce a stronger approach. Where tree officers are sure of the need to protect the tree, “will be refused” should be used.

8. Paragraph-by-paragraph critique of the draft Tree Policy

Our recommendations on draft policy sections 1 and 5 are covered for the most part in our section 2 above.

10 4.6 Mention should be made of trees in parks as one of the invariable expectations, not just “in streets and squares”.

6.2 “Management challenges” would be more accurately and appropriately entitled “Challenges to trees” or “Problems faced by trees”.

15 6.3 “Challenges” would be more accurately and appropriately entitled “Challenges created by trees” or “Problems resulting from trees”.

7 “Management and Species Selection” would be better structured by relocating the tree cover and species selection elements to the next section, 8 “Tree planting”, and the elements on climate change more appropriately relocated and renamed under section 6, “The case for trees in the urban landscape”. Section 7 is then redundant for these purposes and could be used to pull together all issues related to pruning, under a new section 7 heading, “Tree pruning”.

25 7.1 “there is a risk that over many years some areas of the Borough will lose tree cover altogether” and “Or be left with only one or two species of tree. This has serious implications when diseases cause major losses”. We deal with these exaggerated statements under 23.1.4 and 23.1.5 below.

7.7 “Planting of upright, small-leaved trees in narrow streets reduces complaints regarding to shading, leaf litter, low branches and vehicle obstruction.” HCA is opposed to the use of fastigate forms for street trees. Streets have traditionally contained large-growing species with a spreading canopy. We view it as important that this continues. It may be that such trees impact on the buildings nearby, but this can be managed and this approach is better, in our view, than planting trees that can never become a successful landscape, amenity feature or contribute successfully to the wider environment. It is an issue strongly related to the statement quoted earlier from “Trees in Towns II”, “The replacement of one large, native tree with two trees of a relatively small, ornamental cultivar is likely to have a negative environmental impact – providing significantly less biodiversity and aesthetic value”.

9.1 - 9.3.1 appear to touch tree policy tangentially at best; their present content is not focused on trees. A sustainability statement could be included in an appendix but the text here simply doesn't fit with the subject – trees. This takes up a whole page to no relevant purpose.

9.3.2 bullet point 1 should be in the achievements of the 2002 Tree Policy. Bullet point 3 is fascinating as an aspiration; trees on roofs in new developments would be very welcome but where is the policy, what are the objectives, where is the action plan? If this is to be a reliable and realistic guide, those details need to be included. In practice, green roofs are unlikely to support trees, we suggest. The climate adaptation plan should include support for and preservation of large-growing broadleaf trees as an additional bullet point. Such a point would also fit in well elsewhere in the document.

9.4.1 List the actual “current and future initiatives” and locate within 6.2.

9.4.2 Trialling or trying out new species relates to 8.1.7. These two paragraphs could be more powerful if merged. Developing a well and research on watering could be part of 6.2. One well will not achieve much; a case should be made for wells as beneficial now, as trees have been suffering from hot, dry summers. We are appreciative

of the recent initiative of placing "Please water me" notices on some new planting. If not already part of this initiative, leafleting the two houses on either side of the new planting, asking residents to volunteer for this, might be helpful. Sustainability itself would be covered appropriately by flagging up the sustainable aspects of other sections and paragraphs of the Tree Policy. It seems not to form a section on its own.

10 Biodiversity Some of this section appears to be oblivious of the planting objectives in other sections, e.g. 10.3, bullet point 1. Other than for duplicating mention of the black poplar, the section gives no appreciation of the existing tree-related diversity – over forty species – or cases such as the varieties of London plane mentioned elsewhere in our response. Biodiversity is in-built in several other sections. This section 10 should be checked for elements that are not dealt with elsewhere and reduced to unique points to avoid unnecessary repetition. It should recognise, as we note in our Policy Context, that biodiversity is a seam running through much of the draft tree policy, an example being at 23.1.8.

15 11 Bats This takes up two and a half pages. Of what has been written, only a part has to do, directly, with trees and could be simplified. The Appendix G referred to, but not included amongst the files available for download from the Islington website, might well absorb the less tree-related passages on this important mammal. This section could be reduced in size. We have also made a recommendation in our section 5, above.

16.2.1 It is a big step forward to have a computer system capable of many functions in relation to the borough's trees. We understand from the software company's website that the EzyTreev computer software "offers a system with a high degree of end-user friendliness and configurability". Often, the quality and scope of information is a prime issue and the prospect of being able to access, in reports, the kind of information that is needed is enabling as well as cost effective. As a community group, HCA would like the opportunity to recommend the inclusion of types of information we feel the community can benefit from and we see the EzyTreev system as having the

capacity to add data of this type in the Council's systematic reporting. We ask that such possibilities will be flagged up in the Tree Policy.

22.12 Education This section appears to be about maintenance of trees at schools; it might well be expanded to include the importance of community education resources
5 such as the Ecology Centre. Is it correct to assume that the "education toolkit around the benefits of trees and why trees need to be protected" mentioned in 25.1 "Dog damage" is a general tree resource, not just dog damage-related? It could appear in this section on education.

23.1.1 "climate change" should be an additional bullet point.

10 23.1.4 Age distribution This paragraph and the one immediately following are probably the most disconcerting in the main text and genuinely worrying.

The phrase "mature and over-mature" may be read in different ways by different people. In terms of tree species, the terms vary in meaning from tree to tree. A definition of these terms is required, perhaps taking a common tree in Islington for each of
15 short, medium and long life expectancy species and indicating the time in years that these species might exist in their "mature" and "over-mature" phases and how long beyond that before the trees have completed a "veteran" or "ancient" phase. A species chart could be useful for displaying this information.

The sentence, "Within a relatively short period of time these trees will reach the end
20 of their life expectancy and need to be removed" is inadequate and worrying. This assertion is not founded on evidence presented in the draft Tree Policy and is, therefore, closed to examination of specific trees; however, it is not acceptable to cut down healthy trees and the BS 5837:2005, although written with different purposes in mind, construction sites, is relevant here; it presumes trees with over 20 years life expectancy
25 should be protected and not felled for development other than for overriding reasons. This statement, then, should at very least give criteria for assessing a tree as being at the end of its useful life. (The longevity of the London plane is noted in

our section 3 above, "Omissions".) We ask for clear estimates of species longevity and criteria for judging the time when a tree has ended its useful life to be included in the Tree Policy. "Trees for Towns II" states "The importance of mature and ancient trees in urban areas is undeniable".

- 5 The next contentious statement in 23.1.4 is, "In some sites it may be necessary to remove some of the existing mature trees to create space to plant new trees". This is even more alarming as there is no suggestion that the trees may be nearing death. Jill Butler, specialist on ancient trees, has written to us saying, "I agree entirely that it would be wrong to fell mature, healthy trees. This would be among many other things
- 10 that are contrary to climate change mitigation efforts – as mature trees are far more effective than young trees and we need all the mature trees we can get in the heart of big cities like London. Trees in Towns II highlighted the threats and evidence of loss of mature trees in urban areas and they should be safeguarded at all costs".

Paragraph 23.1.4 is perhaps evidence of a shortage of space for new trees in

15 Islington, or that new sites are more costly to develop for new trees than old sites. The Tree Policy should not propose the felling and removal of healthy mature trees – quite the opposite. In particular, the sentence "In some sites it may be necessary to remove some of the existing mature trees to create space to plant new trees" must be deleted. Clearly, there are many places in Islington that have few if any trees; we

20 would want to know the strength of the constraints on planting in these places before any thought were given to making suggestions for felling and removing trees with more than 20 years useful life expectancy. We believe that by actively engaging with interested people within the community, the Council could identify such areas; this might form part of an action plan for engaging the community in helping to implement

25 the Tree Policy.

23.1.5 Lack of Species Diversity We have dealt thoroughly, above, with the situation on Highbury Fields as regards the genetic variety of London plane trees, and as Highbury Fields is the one site mentioned in this paragraph we assume it is the plane trees here that are being alluded to. If this is not the case, the text of the paragraph

does not make clear its authors' intentions. It is premature to draw any conclusions, but especially so about the desirability of felling some of these planes for "species diversity"; far more research needs to be done. The Manager of the Mayor of London's "Tree and Woodland Framework", Jim Smith, has written to us saying, "I think
5 in principle the position of removing healthy, viable trees to facilitate biodiversity replanting is not generally the way forward in urban areas". This is our position, too. We note there is already a wide variety of species in Islington, some 40 species.

We are not persuaded, either as regards species diversity or balanced age range, by the identification of a number of pathogens and pests in paragraphs 7.1 and 23.1.5;
10 the claims made are regrettably alarmist, akin to the recent swine 'flu hysteria, and could lead to quite the wrong decisions being made. The conclusions, set out in 7.1, that "there is a risk that over many years some areas of the Borough will lose tree cover altogether [...] Or be left with only one or two species of tree. This has serious implications when diseases cause major losses", are an exaggeration that cannot be
15 supported by current knowledge of the certain or suspected effects of climate change or of the spread of pests and diseases. The evidence, as we show below, suggests no such doomsday scenario. The paragraphs would have some value were they to include an assessment of each problem disease or pest and show an action plan for the containment and prevention of disease and infestations of pests. They are unac-
20 ceptable in their current form and must be redrafted or removed entirely.

The Asian gypsy moth, (see draft Tree Policy, 7.1), feeds on more than 500 host species of trees and shrubs; it may be eradicated by spraying caterpillars as infestations break out; neither diversity of species nor age distribution are a protection in this instance.

25 The horse chestnut leaf miner, *C. ohridella*, (see draft TP, 7.1), is a disfiguring pest that kills the leaves but not the tree. The advice of the Forestry Commission's agent, Forest Research set out on its website is that, "Damage by *C. ohridella* is primarily an aesthetic problem, and there is no evidence that infestation, on its own, causes die-back or a decline in tree health, or tree death. Consequently, there is no reason to fell

and remove trees just because they are attacked by *C. ohridella*. Even severely infested trees will re-flush as normal in the following spring. However, damage to trees in parks, gardens and in other urban situations can be reduced by removing fallen leaves during the autumn and winter, and this can help ensure that trees retain their vitality. In the long-term, it is hoped that biological control will lead to a permanent reduction in the pest population.” Because the pest over-winters on fallen leaves, good hygiene – winter leaf clearance – is clearly useful in efforts to control the numbers of the emerging moths whose caterpillars do the damage and this should be made common knowledge by the Council to owners of private trees; leaf clearance should be made a particularly important issue for the Council’s own contractors. The line of horse chestnut trees along the terrace at 23-61 Highbury Park, near Highbury Barn, for instance, has been particularly badly disfigured in each of the last few years; the fallen leaves do not appear to be removed during the winter.

Sudden Oak Death, a serious disease that continues to be investigated by Defra, is not peculiar to the oak. Forest Research notes, “Except where disease levels are intense on foliar hosts such as *R. ponticum*, [the Rhododendron], *P. ramorum*, [the fungal-like pathogen which is the causal agent], is unlikely to infect European species of oak (such as common or pendunculate oak (*Q. robur*) or sessile oak (*Q. petraea*)), Laboratory tests on their relative susceptibility indicates that these species are more resistant than their American cousins.” Species that are known to be susceptible to the disease include the beech, sweet chestnut, some types of oak, ash, sycamore, eucalyptus, Japanese larch and magnolia. As many nurseries have been found infected – but subsequently cleared of infected stock – this is good reason to ensure new trees are healthy before accepting delivery; the other main reason for careful inspection, and for assuring best value, is that there should be no physical damage to new trees before they are planted. There is room for improvement in quality control over the state of new trees before accepting them; a recently planted plane opposite the junction of Highbury Terrace and Highbury Terrace Mews has serious bark damage dating from before its planting at this site. The Tree Policy should state that the Council will accept and plant only trees that are confirmed by the Tree Service to be of high enough quality for planting.

Pathogens exist, of course, but are extremely rarely as devastating as in the case of elm trees. A reason the elm trees so succumbed to Dutch elm disease was partly their similar genetic make-up – but for a few individuals, they were all the same one or two clones – the elm was unusually lacking in genetic variety for a tree species.

5 Even if a group of same-species trees were to be killed by pathogens and had to be felled, it is arguably better to replant a whole area rather than to create a patchwork that never looks as good, as a landscape feature, as a coherent planting. Within fifty years trees grow to a substantial size, so recovery is quite swift. Our street trees and parks are not unmanaged woods that naturally regenerate themselves in a cycle of
10 collapse and renewal; town trees are artificially arranged and well designed arrangements make for better looking town landscapes. The infill planting of different species on Highbury Fields, after the elms were removed thirty years ago, now shows how unsuccessful such ad hoc planting policy truly is for such designed landscapes. At this site, however, and by contrast with that introduction of different species, it can
15 also be seen how limited infill planting of the same species as the trees nearby has been a success, visually and arboriculturally; this is the reason for the two local amenity groups' promoting in "Highbury Fields Trees", the planting of new plane trees in avenues of existing, mature plane trees.

A particular disease of the London plane is mentioned in 23.1.5, "Massaria disease of
20 plane", which struck in Germany soon after the start of this century. It spread across western Europe but during the five years since its emergence as a problem it has not appeared in London or in the UK at all, as was confirmed to us recently by scientists who test for this disease at Forest Research and as the draft policy also notes. We have also been in contact with tree officers working in Mannheim, Germany, where
25 the disease has attacked London plane trees. Their story gave us hope that, were the disease to spread to London, it would be manageable. In brief, tree officers in Mannheim inspect their London planes regularly, cut out infected branches and in cases where a tree is heavily infected, remove it and replant with a young plane in the same location to maintain the structure of their treescape, which relies heavily on
30 the plane. This is possible because the disease is not systemic and does not attack

the root system. A part of the Plane Action Plan we recommend, would be to gain a thorough knowledge of how problematic the disease has been in European countries such as Germany and how it has been treated on mainland Europe.

5 The sentence in 23.1.5 "In some sites it may be necessary to remove some of the existing mature trees to create space to plant new trees" must be deleted and the whole paragraph reconsidered and redrafted.

23.1.7 Visual impact This paragraph is assuming a particular aesthetic: one should guard against imposing any one approach. This is one case, and there are probably several others, where there are options for the design of landscapes. Not all parks
10 look alike and it is this diversity of appearance that gives individual parks their character, and their characters should be understood and respected.

27.1.3 "Currently the authority does not have an active policy of increasing the number of TPO'd trees in areas outside conservation areas." This must be a left-over. Policy 24 contradicts it.

15 **9. Policy-by-policy critique of the draft Tree Policy**

In general, all the policies should show whether they relate to public trees, private trees or all trees.

A policy checklist should be provided collecting all policies in one place.

20 Policy 1 This seems self-defeating. At least change "most" for "many". "Scale down" can be achieved through pruning; small-growing trees are unlikely to be a requirement in "most" circumstances.

Policy 3 This intention to diversify can stand, but only provided that 7.1, 23.1.4 and 23.1.5 in particular are radically altered or deleted, as outlined earlier, and that it is made clear in paragraphs where we have shown it to be in doubt, that promoting
25 diversity across the borough as a whole is the aim, not for individual sites. The use of

the word “monoculture” is derogatory; inevitably, it will be taken as disparaging or damning of collections of same-species trees, which is a seriously inappropriate message to convey if the local authority respects our trees; it is a misnomer, anyway, as such collections of trees in Islington can truly be described as “dominant” but not as “monocultures”. We refer to our comments on pests and diseases above as clearly demonstrating the inappropriateness of the statement, “the risks that monocultures present for tree management, such as pests and disease that can threaten entire species”, in Policy 3.

Policy 6 Can this aim be worthwhile, given that “endeavour” is currently the strongest word?

Policy 8 “There will be a presumption against the removal of Council trees . . .” should be replaced with “Council trees will not be removed . . .”. Two bullet points should be deleted: “Considered by the Tree Service to be inappropriate species for the location” and “When removal is required as part of an agreed management programme or as an overall improvement project”. The phrase “inappropriate species for the location” is not one that can be taken on trust by the community, and needs the tightest definition. We regard it as subjective; no existing tree should be removed unless falling within the first two bullet points – “Dead, dying or dangerous” and “Proven to be causing significant structural damage” – other than under exceptional circumstances. The phrases “agreed management programme” and “overall improvement project” are not defined and do not appear anywhere else in the draft Tree Policy. They are catch-all phrases in their concept, too vague to be properly protective of trees, and must be removed.

Policy 10 Consider adding “professions” to “industry”.

Policy 11 Pruning of overhanging trees – two statements appear to be contradictory. The final bullet point is good but on page 24, “Local authorities instigate a regime of selective removal and replacement of street tree stock in areas predisposed to building movement where this is appropriate” must be removed.

Policy 12 "this policy" – Which policy?

Policy 16 This policy should include "damage", as well as "removal", as a legitimate reason for claiming compensation from external organisations or individuals. Damage can have both fatal effects on trees over time and immediate adverse effects on amenity value.

Policy 17 Change negative to positive: from "It will not be Council policy to remove trees . . ." to "It is Council policy not to remove trees . . .". The policy should add CCTV to the list here or state in another of the policies that CCTV is not an acceptable reason for felling a tree.

10 Policy 20 Use "It is a requirement of the Housing Department to ensure . . .", not "The Housing Department should ensure . . .".

Policy 23 Misplaced word, "Tree"?

Policy 24 HCA suggests adding the words in italics: "The Council will *pursue an action plan* to identify and protect trees worthy of TPOs for trees outside of conservation areas."

Policy 26 Change to "... that new trees are ~~allowed~~ *provided* for on development schemes ...".

Policy 27 Change "to have a high regard for the retention ..." to "to ensure the retention ...".

20 Policy 32 If this policy relates only to TPO'd trees, a fast-track TPO action plan needs to be brought into operation as swiftly as possible.

Policy 34 Replace "should" with "will", "The Council will actively enforce and prosecute where appropriate ...".

10. Recommendations from “Highbury Fields Trees”

In a spontaneous initiative by the local community, a substantial study was made jointly by Highbury Community Association and Highbury Fields Association, following the adoption by the Council of “A Vision for Highbury Fields” in 2007. The community groups looked closely at the trees in their local park, Highbury Fields, and produced a publication, “Highbury Fields Trees”, in 2008. The study concluded with thirty recommendations, which we see as relevant to the present Tree Policy. Indeed, the book was written with the forthcoming Tree Policy in mind. It can be taken as a case study and checklist to see whether the Tree Policy would be in concert with the Associations’ recommendations, in anticipation of a local tree policy for the park being agreed after the adopted tree policy for the borough has been published. Therefore, we include here all the recommendations and look for clear expression of principles in the final Tree Policy such that it will enable each of the recommendations in “Highbury Fields Trees” to be put into practice – i.e. not fall foul of 23.1.1, “It is our intention to develop site specific park management plans for all of the significant parks and open spaces. [...] These objectives will be inline with those set out in this policy” – should it be the decision to follow the recommendations following local consultation on a tree policy for Highbury Fields.

The recommendations are:

20 The plane trees, which form the network of interlocking avenues, should be sustained and maintained as a coherent group.

Therefore, a strategy of selective felling and replanting of existing healthy plane trees must not be adopted. The design of these formal avenues is not suitable for conversion to a wide variety of tree species; the integrity of the plane tree avenues is an essential characteristic of Highbury Fields and creates its sense of place.

We support the “Vision”’s aim to plant planes in existing avenue gaps that have enough room for their expansion into maturity, and the current single-species layout of the avenues.

We support the planting of planes in any future avenue gaps if a plane has to be removed. We reject any suggestion that such gaps should be filled with other species. This would not only spoil the effect of the avenues; it would also provide no kind of solution should a catastrophe occur to wipe out the planes.

- 5 Engage a consultant specialist in plane trees to record the types and locations of the variants of London and other planes on Highbury Fields.

Set up a scheme to support the diversity of the plane trees. Investigate the possibility of propagating from the rarer variants of the London plane, of which Highbury Fields has a special collection, so that a varied stock of original trees is available for new
10 planting when necessary.

London plane trees have successfully endured the high pollution levels in London of the nineteenth and early twentieth centuries and have proved themselves to be the hardiest and most good-tempered of city trees. We do not know what will happen in the future, but if Highbury Fields' plane trees end up suffering from climate change,
15 so will all the planes in London: we cannot justify experimentation with other species here just on these grounds.

However, there are two climate-change-related sets of actions that need to be taken. First, when gaps need filling, they should be planted with other plane varieties, taking note of the plane tree consultant's recommendations. Secondly, the Highbury Fields' planes (and all its other trees) need more intensive care, on the assumption that they
20 are under more water and temperature stress than they were in the past.

Such measures should include more active protection through:

- (i) Watering young trees in dry periods more frequently than at present and for 3-5 years from planting until root systems are well established.
- 25 (ii) Pruning trees as lightly as possible to avoid multiple pruning wounds – avoiding crown lifting and avoiding crown reduction.
- (iii) Guarding existing and new trees against dogs and grass cutting equipment

such as strimmers.

(iv) Repairing fencing to prevent vehicles driving over tree roots and installing additional fencing for root protection where required.

5 (v) Enforcing a tree work and park maintenance code of practice to the standards in BS 3998, "Recommendations for Tree work".

(vi) Establishing policy and practice norms with ground staff that increase their understanding of trees and reduce accidental harm to trees; imposing a range of substantial financial penalties on contractors for damage resulting from their activities.

10 (vii) Taking measures to decrease soil compaction on the Fields, at the same time ensuring adequate access to water for trees.

(viii) Avoiding damage to trees from inappropriate chemicals and protecting them from road works and from salt put on the roads in cold weather.

15 (ix) Regular clearance of leaves, especially in autumn, to maintain hygiene and counter otherwise harmful micro-organisms and to improve the grass.

(x) Taking up tarmac between trees along Highbury Crescent and replacing with a strip of grass, (comparable with that near the Ranger's office), to improve water penetration to the trees. This would also increase the area of grass and enhance the visual appearance of the park.

20 (xi) If considering mulching trees at present surrounded by grass, monitor the benefits of mulching on previously created test areas.

(xii) Exploring ways of storing rain water that runs off the park to service trees of all ages.

25 Maintain an accurate survey plan of the trees and place a plan of the trees, including species identification, on the Council's website. In addition, many people would enjoy studying such a document if it were placed on a durable board somewhere around the periphery of the Fields.

Retain the existing healthy lime trees in Highbury Place and fill gaps, where appropriate, with new lime trees.

Recognise, in the future planting scheme for Highbury Fields, that trees will grow and should be given adequate room to reach maturity.

Remove very badly damaged trees and replace if appropriate, in line with guidelines set out here.

- 5 Fell dead trees, using some of the dead wood as habitat where appropriate.

Make it a presumption that trees that are taken down will not be replaced – other than for planes in the avenues – so as to reduce overcrowding.

- 10 Place a moratorium on any tree planting on new ground, including memorial trees, for the preservation of open space and to ensure the values of the existing landscaping are not reduced.

Develop new guidelines for those wishing to place memorials on the fields, (such as suggesting benches, or a contribution to the planting of replacement plane trees).

Reduce overcrowding in the Orchard, allowing the possibility of a garden and more usable open space.

- 15 Reduce overcrowding on the Mound to maintain open space.

Remove infill trees of other species in avenues which impede the continuing growth of the plane trees, including the oaks along Queen's Walk which destroy the magic of the circle of mature planes at the centre of the path.

- 20 Create and advertise lines of communication between the Council and local people concerning trees on the Fields: both formal, annual procedures and contact details for the reporting of problems as they arise.

Establish the proposed Management Group of park users and Council officers to sup-

port the trees on Highbury Fields. Actively involve Highbury Community Association and Highbury Fields Association (who have jointly produced this document) in this Group and in the development of any proposals, schemes of work for and monitoring reports of the Fields.

- 5 Make this document a part of background information presented to arboricultural and landscape design consultants and to other agents and bodies engaged on work for Highbury Fields.

11. Conclusion

- While many of the alterations to the draft Tree Policy requested above could be made quite straightforwardly to the draft as it stands, HCA recommends the Council take the opportunity, even at this late stage in renewing its Tree Policy, to address all the concerns we have expressed and to consider a fundamental restructuring and rewriting of the draft Tree Policy. The time that has elapsed since the first, 1992, document has brought so much new material into play that a different approach to structuring the document would be of benefit to the new Tree Policy as a document accessible to a wider readership.

Highbury Community Association
4th February 2010