## Highbury Community Association submission to Overview Meeting, 1/2/2011: Tree Policy.

Members of the Overview Committee are requested to take account of the points raised here and to seek the development of the Tree Policy 2011 along these lines before it is finally approved.

Members of HCA are shocked that the Council's Tree Policy [TP] has shrunk from 36 policies / 54 pages in TP 2002, to 15 policies / 2 pages in TP 2011, including its one-sentence introduction.

This is even more surprising as the Council's new Allotment Policy, also agreed by the Executive on 13/1/2011, comprises 9 pages. It contains a substantial explanatory introduction; its 12 policies each have supporting text explaining their purpose; there are specific aims and objectives where appropriate, including statistics where relevant; and other related information is included.

HCA's observations on the pending TP 2011, are that:

- 1. The format is inconsistent with other Islington Council policies, and with other councils' TPs. Such compressed presentation is a step backwards from transparency, and accountability.
- 2. This significant change in format is untested through consultation with the public.
- 3. The format is scarcely fit for purpose and will inevitably lead to misunderstandings as the policy statements are unexplained but do require explanation for full understanding. Valuable policy descriptions from TP 2002 and Draft TP 2009/10 have been omitted.
- 4. Loosely drafted phrases in TP 2011's policies 14 and 15 regarding removal and pruning of trees may be in conflict with other policies and necessitate explanation, e.g.
  - "considered by the Tree Service to be inappropriate species" vs "healthy mature trees will not be removed to create space to plant new trees";
  - "an agreed management programme" begs the question who are the signatories to the agreement and are the public a part of such agreements?
  - "judicious light pruning" requires thorough definition.
- 5. There is no context for TP 2011's policies: no reference to national or regional and London policies; no assessment of TP 2002; no indication of changes made for TP 2011 and the reasons for them. There are no data on the existing status of trees in Islington or how tree cover has changed or explanation of how and why it is expected to change.
- 6. As a minimum, a strategy for street trees and one for parks and open spaces are needed.
- 7. A management plan for each should describe goals and show how those goals will be reached through action plans, however modest actions may need to be in current financial conditions. Indeed, given these constraints, at least in the short-run, plans should contain essential, desirable and optional treatments. There is no action plan, even in simple form.
- 8. There is no management methodology.
- 9. There is no mention of local tree strategies for streets or for parks and open spaces and no sense of seeking to involve the public in the management of its trees as this significant departure from the consultation process attests.

It is possible to strike a happy medium between an over-long, confusing document and one that is over-compressed for proper understanding. HCA seeks a TP that recognises the need to engage with the public through a well written explanation of how the Council sees its future work with trees.

The TP produced by Newcastle City Council is recognised as a good model – it has four clearly separated parts comprising Action Plan 2008-12 (8 pages), Tree Policy 2002 (19 pages), Tree Management Guidelines (7 pages) and Contacts (2 pages), plus occasional Progress Reports, involving the public (around 15 pages). See <a href="https://www.newcastle.gov.uk/core.nsf/a/conservetrees">www.newcastle.gov.uk/core.nsf/a/conservetrees</a>.

Something a little shorter than TP 2002 could no doubt be produced: but the current document does not deserve the name of a policy.