

Your name	Susan Crisp Sarah Vaughan
Organisation Name	Friends of Burgess Park Trees for Bermondsey
EiP Hearing Matter No.	Matter No 7
Specific Strategy, Policy or Question	P60 Trees
The test of soundness the plan fails	The policy is not effective

P60 Trees

Q 7.29 Is the policy justified, effective and consistent with national policy?

What is the problem? Is the policy justified and effective?

To deliver the Council’s Climate Emergency commitment will require a more robust P60 Trees policy. The retention of carbon sequestration in existing trees and the canopy cover will contribute substantially to the actions the council can undertake and influence. Many trees will out live the life of buildings (E.G. Examples of retained trees: Heygate estate trees now in new Elephant Park and Gloucester Grove estate trees now in Coleman Road).

Current policy is not effective as there are numerous examples of (i) trees being felled despite local opposition as demonstrated by campaigns and (ii) poor maintenance of new trees installed by Developers. Trees in Southwark need more protection.

Example 1 Canada Water Masterplan - 244 individual trees plus 75 “groups” of trees were identified on the site. Although only 17 individual trees and 2 groups of trees were classified as “Unsuitable for Retention”, just 49 trees are retained. Almost all hedges and shrubs on the site were also approved for removal.

According to the Planning Committee Report, “replacement” planting on and off-site will mean that equivalent canopy cover will only be achieved by 2038 i.e. in 18 years from removal of the existing trees.

Example 2 Cox’s Walk Oaks - saved by last minute provisional TPOs being issued for the oaks and surrounding ancient woodland (part of the Great North Wood dating back to the 1600’s) after a long campaign and 177 local objections, plus a petition of 6692 signatures and re-evaluation of original plans to remove the trees following the objectors’ submission of an alternative proposal which was ultimately judged to be the most economically and ecologically viable taking into account the high amenity value of the trees.

Example 3 Bellway Homes development, Elmington Green in Camberwell – After removal of eight large-canopied trees and assurances that new planting would make up for the loss of the trees, Bellway’s contractors failed to check what they planted was compliant with the planning permission. Some trees could not be planted because utilities had not been taken into account and those that were planted were smaller than the heavy-standard trees specified on the plans.

Despite Bellway paying the council to plant three trees elsewhere in compensation, the development was still four trees short.

Maintenance of the new trees by Bellway's contractor was poor. Two Himalayan birch died from lack of watering and were not replaced, in breach of the agreed terms. A Chinese red birch also died and was replaced, not with a heavy standard tree as previously but with a small bush of the same species.

Responding to pressure from the TRA, Southwark Council are pursuing enforcement action against Bellway at time of writing.

Example 4 Barratt Homes development, Downtown Rd – Circa 300 trees were removed to make way for this highly contested development. Twelve extra-heavy standard trees were planted as mitigation, all died through neglect. At locals’ instigation the trees were replaced and again all failed through lack of care, despite attempts from locals to water them. At the time of writing, after sustained campaigning, the trees are about to be planted for a third time, this time at council tax-payers’ expense, as the developer’s warranty has expired and they cannot be pursued. This means that any mitigational factor has been negated by having to replace trees three times.

The current policy does not resist loss of trees or send the right message on adjusting development plans to accommodate trees, with too much focus on replacement.

Is the policy consistent with national policy?

The NPPF takes a robust approach to protecting and enhancing the natural environment saying “Planning policies and decisions should contribute to and enhance the natural and local environment”. However, as a national policy NPPF is covering both urban and rural areas, national park through to urban street trees. Further policy is needed to reflect the urban area, deficits of green space and inequality in canopy cover across Southwark.

Southwark should seek to surpass national policy which is currently insufficient to protect the borough’s trees. The current NPPF only requires protection of ancient and veteran trees and woodland, not trees in general. Although, Southwark has tiny pockets of ancient woodland and veteran trees in the south of the borough, the vast majority of trees cannot be classed as such.

More detailed policy for the urban context is provided by the London Plan.

The new London Plan (about to be published Dec 2020 version) Policy G1 Green infrastructure and the related policies takes a more pro-active approach to address inequalities in access to green space and identify opportunities for enhancement. This is needed to address the lack of tree cover in some areas of the borough.

The correlation between tree canopy and ethnicity and income level has been recognised for some time in the US: "If you show me a map of tree cover in any city, you’re showing me a map of race and income levels. “ CEO, American Forests, Bloomberg City, 2020.

The new London Plan Policy G7 Trees and Woodlands says “The Mayor wants to increase tree canopy cover in London by 10 per cent by 2050”. Canopy cannot increase unless as much existing canopy as possible is retained. If existing trees are removed, new trees need to be planted in greater numbers, as a tree takes decades to reach maturity. Planting new trees alone does not guarantee an increase in canopy but it is generally the trees with larger canopy potential that provide the most benefits. “If new plantings are made up of smaller stature species there will be a lack of larger trees in the future. To maintain or increase canopy cover and tree benefits at or above current levels then more trees capable of attaining larger statures will need to be planted and maintained.” (Southwark Borough Council i-Tree Eco Stratified Inventory Report Of Southwark’s Public Trees 2019). For worked examples and models see the Bristol Tree Forum’s CO2 calculator used by Bristol City Council.

All trees are valuable. Policy G7 Trees and Woodlands states “Development proposals should ensure that, wherever possible, existing trees of value are retained”. Trees considered suitable for retention are divided into three categories: A “High Value”, B “Moderate Value” and C “Low Value” (BS5837:2012 Table 1 – Cascade chart for tree quality assessment). All trees will

contribute to tree cover, canopy and carbon sequestration. A small newly planted tree, which may not survive will not be able to deliver on these policy objectives to the same value - however measured. The proposals coming forward to Southwark Planning Committee tend to be dismissive of B and C categories and the current P60 Policy would not enable the council to resist this. Current policy requires insufficient numbers of replacement trees or compensation to make up for their loss.

Kensington and Chelsea (Local Plan 2019, policy CR6 Trees and Landscapes) is to resist loss of trees and the Royal Borough of Kensington and Chelsea (Trees and Development SPD 2010) favours retention of trees in all three categories (A, B and C). Such a policy would ensure that existing trees are designed into plans at the earliest stages of development and only removed "as a last resort".

In RBKC's SPD it says: "1.5.1.2 There is often a misconception that category 'C' trees, being those of lower quality and value, are dispensable. However, in certain situations it may be a requirement that certain category 'C' trees are retained until new planting has established."

Where new trees are planted the policy must ensure that trees are established rather than just planted; there is little value in spending millions of pounds in planting trees which never make it to maturity. The early years are key to the survival of trees and whether they reach maturity. This is dependent on how well the tree is planted and protected and on watering. Clear and precise Service Level Agreement (SLA) linked to Key Performance Indicators (KPIs) for tree planting, establishment and care should be issued to developers and contractors, with penalties strictly enforced for failure.

Successful establishment and ongoing care of trees would be helped by obligatory inclusion of sustainable drainage and water conservation systems in any new development or retrofit where rainwater and grey water can be redirected to tree-pits and rain gardens, thus reducing the need for watering. Plantable spaces need to be developed across central and northern areas of the borough with insufficient green space to establish pockets of green supporting wildlife corridors in line with other SP6 policies.

To be justified and effective Southwark, as an inner London densely populated borough, with a huge amount of development, should adopt a more robust approach to achieve the requirements of the NPPF and the new London Plan.

Heritage SPD

The new draft Heritage SPD (currently out for consultation) is very positive with inclusion of trees, hedges and landscapes and provides further welcome protections. We will have time to

consider a more detailed response during the consultation process. However, the Heritage SPD seems to go further than the current policy in protection of trees as assets and is a further reason to make the P60 Trees wording stronger to resist the loss of trees.

Proposed text amendments on NSP EIP27A submitted 2020 version

ADD: Tree Fact Box

Trees are some of our most valuable assets - The estimated total public amenity asset value is over £2.6 billion for the urban forest of Southwark; all trees are valuable. For every £1 spent on trees in the UK, we save £7 in healthcare, energy and environmental costs

Tree Inequity - According to Southwark's Planting Strategy, the southern half of the borough has the highest percentage of tree canopy and the lowest is in the north. Tree canopy in Dulwich Village in the south of the borough is 29.8%, whereas canopy cover in Old Kent Rd ward is 10.8%. Some wards have as little as 5.5% which could be even lower where heavy pruning regimes employed in the most built up areas are taken into account.

Trees clean our air – Southwark's SE1 postcode has the worst pollution in London and an estimated one in 16 Londoners dies each year from exposure to pollution – tree-lined streets have 60% fewer exhaust fumes.

Trees are carbon sinks - Southwark has declared a Climate Change Emergency and the intention to become carbon neutral by 2030. A 40 year-old tree felled in 2020, will need 28 replacement streets trees to compensate for the impact of CO2 lost in order to break even by 2030. A single tree can absorb around 22 kg of carbon per year and by the time it is 40 years old stores around 1 ton of CO2. (Bristol Tree Forum CO2 calculator, developed with Bristol City Council).

Trees cool us down - London is a heat island and can be 7 degrees hotter than unbuilt areas – trees release water vapour through their leaves and provide shade. The cooling effect of one mature tree is the same as 10 air-conditioning units running for 20 hours every day.

Trees help prevent flooding - a tree captures water on its leaves, slowing rainfall, and can absorb up to 450 litres of water through its roots in a day. Trees also reduce soil erosion and filter and slow down rainwater before it reaches drains, sewers and water courses. Climate change and rising sea-levels mean that within 50 years the northern part of Southwark will be at high risk of serious flooding. Retaining as many existing trees as possible, depaving and planting more trees can mitigate against its effects.

Trees have an essential part to play in urban biodiversity – a single tree can support thousands of different species (e.g. the English oak alone supports 2300 species) – flowers and berries

provide forage for birds and insects, they are home to bats and small mammals and help create vital green corridors between gardens and parks

Trees make us happier and healthier – Being around trees lowers stress and anxiety levels and increases mental wellbeing. More time is spent outside, walking and exercising, on streets and urban spaces with trees. Living close to trees can improve mental health, reducing the probability of being prescribed antidepressants.

Proposed text P60 Trees

ADD:

Tackling the Climate Emergency is a priority and trees have a vital role to play. Retention of existing trees will help deliver the SP6 policies: retaining embodied carbon, improving air quality, tackling urban heating and contributing to biodiversity.

The Council will require the protection of existing trees and the provision of new trees that complement existing or create new, high quality green areas which deliver amenity and biodiversity benefits.

To deliver this the Council will:

- a. resist the loss of trees unless: i. the tree is dead, dying or dangerous; ii. felling is for reasons of good arboricultural practise.
- b. resist development which results in the damage or loss of trees of townscape or amenity value;

(Continue with existing P60 Trees: (ADD additional wording in Bold))

1. Development will (new word) **require that** (delete: be permitted if) trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, the character of the neighbourhood and where tree canopy is lacking.

2. Development must retain and protect significant existing trees including:

1. Trees designated with Tree Protection Orders (TPOs); and
2. Trees that have a high amenity value; and
3. Trees within Conservation Areas or the setting or curtilage of listed buildings; and
4. Veteran, ancient and notable trees; and

3. Development must retain and enhance the borough's trees and canopy cover; and
4. **ADD There must be a presumption to retain trees whenever possible, but where removal cannot be avoided** (delete: to facilitate development), they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either
 1. Within the development whereby valuation may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology or other assessment; or
 2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include **ADD five-year** ongoing maintenance costs where trees are planted in the public realm. **ADD new wording: The financial contribution will be commensurate with the cost of planting enough trees to make up for sequestered carbon stored by any trees removed, and where planted in the public realm, will include five year ongoing maintenance costs and adherence to a detailed management plan to ensure successful establishment.**
5. Tree planting should be adaptable to climate change while supporting native species. The selection and position of trees should improve air quality and they should have a long life (**delete:** with) and high biodiversity and amenity value.
6. Retained trees must be protected during the construction process in line with British Standard BS5837.
7. Removal of trees protected by TPO or conservation area status will **ADD (in Bold) only** be permitted **ADD in exceptional circumstances** where sufficient evidence has been provided to justify their loss. Replacement planting will be expected where removal is agreed. The replacement of TPO trees must take into account the loss of canopy cover as measured by stem girth and biodiversity **ADD and amenity** value.

Reasons

Southwark's 108,000 (**shouldn't this be 120,000 excluding woodland? See Southwark Tree Management Policy 2020 "Southwark's Treescape 2.1- suggest Number is deleted as it will change**) trees are an asset to the borough as they provide many amenity, environmental and financial benefits that include landscaping, **ADD place-making**, providing habitats for biodiversity, providing shading and reducing the urban heat island effect. Trees also have an

important role in enhancing air quality, reducing surface water flood risk, helping people find their way around and are important historical features.