

## **Submission to Welwyn Hatfield Borough Council on its consultation on the proposed “Trees and Woodlands Strategy”**

### **Introduction**

This follows a consultative document from the Borough Council relating to its future proposals for the management of its trees in both urban and woodland environments.

Our comments refer to the strategy in so far as it relates to the town of Welwyn Garden City. Our comments also refer to the urban environment and not to the woodland area of Sherrardspark Wood. The latter is an area under the operational control of the Sherrardspark Wood Wardens and we are leaving it to them to comment on this aspect of the consultation document.

For the avoidance of doubt, the Society is not able to comment on areas beyond the town, as this is not permitted under its constitution.

### **Background**

This consultation document follows another consultation in 2009 on the Open Spaces Strategy submitted to the Borough Council by this Society, together with the Chamber of Commerce, where both organisations were very critical of the Tree Strategy of January 2007.

This new strategy document does not appear to have referenced any of our earlier comments and so we are bound to place them again before the Borough Council, as we believe them to be as valid today as they were some five years ago.

### **Summary of our earlier submission**

The relevant text of our submission on the Open Spaces Strategy is appended as Appendix 1.

It can be summarised as follows:

1. We said that the issue of “trees” in this town cannot be separated from its architecture and hard landscaping. That is what the “garden city” is all about.
2. We pointed out that the debacle over the lack of management of the Poplars in the Stanborough car parks was caused by the fact that responsibility for those trees had been delegated to Finesse Leisure who clearly failed to manage them over time. As it was, council staff then had to intervene to “rescue” the situation and to organise a consultation over what should happen by way of replacement trees in the car parks.
3. We said that the strategic priorities for the management of trees were faulty in that the objectives were in the wrong order. We said that “preserving the town’s high quality environment” should be the first priority, followed by “enhancing it” and lastly, managing the potential liability should be the third priority. All this is further developed later in our comments on “urban tree management”.
4. We said that the potential threat from trees was exaggerated and should be considered in perspective.
5. We questioned the Council’s claim to manage the risk from trees “proactively”.

6. We suggested that the target to manage all the Council's tree stock proactively was not feasible and that certain key vistas, to be defined, should be properly managed proactively.

### **The new strategy paper**

The Society has seen nothing in the proposed consultation paper to alter its views as previously set out some years earlier. Moreover, it is very unfortunate that nothing is evident in this new borough consultation paper to suggest that any of the points made previously have been taken into account. It has not been possible to find a copy of the "Open Spaces Strategy 2010-2019", which is referenced in this draft strategy document.

There are some very serious deficiencies in it that need changing.

The structure of this strategy paper is unclear. There are no clear objectives set in this paper. Whereas the "Introduction", section 1.1 refers to "aims and objectives" and to a "holistic" policy, we do not find any substance to support these words. We think that both these need to be properly defined. The objectives should be driving all else that follows.

We suggest that the objectives and priorities as set out in the Society's previous submission on Open Spaces should be lifted from the old documentation and placed under a separate Strategic Objectives section in the same order. There can be no reason for changing the objectives of a Tree Strategy when this is so important to this town.

A separate section – that might only apply to Welwyn Garden City – should cover what is meant by "holistic". Too often this word is bandied about and too often policies are applied by silo'd levels of management where operational staff are unable to join up the dots, as it were, on the ground. This is a difficult area to manage anyway and impossible to manage if the priorities and objectives are less than clear. A set of words is suggested, appropriate to Welwyn Garden City, to cover this in the next section. However, it is one thing to include the words within a strategy paper, but they also have to be supported by effective management across various disciplines in the field.

In the absence of the starting position and any strategic objectives, it is difficult to know quite what the Council is aiming to achieve and how. It would be good to see, by way of appendix, some indication over a decade, year by year, the number of trees planted by the Council, the number of trees felled or removed by the Council (as analysed in Appendix 4) and the number of approvals granted to residents by the Council to fell or remove trees. This would help place the tree strategy in context and enable over time some assessment of its success or otherwise. This would help readers to understand the context of the proposed strategy document and whether, overall, there are more or less trees in the town from year to year.

Over the same period, it would help us to see the amounts in £s of claims for tree subsidence/heave and whether this is offset by insurance. Without any statement of the value of such claims, it is unclear how significant this issue actually is.

Appendices 1, 2 and 3 are missing. Again, we think these are important so that we can understand where the strategy impacts.

### **A holistic approach**

The Society suggests the following addition is entered as regards the town:

"In making decisions about trees in the urban landscape of Welwyn Garden City, the setting of the trees and the vista they form part of must be taken into account so that the idealistic and park-like impression linked to a designed streetscape is both maintained and, wherever possible, enhanced."

It is also clear to us that the Council is managing trees and cutting the grass as two separate entities. In this town, the two activities are intrinsically related. A “holistic” approach requires the interaction between both activities to be managed together on the ground in order to attain the stated objectives. In this strategic context, it is vital that Open Spaces and Trees are viewed as a single entity in the urban environment in any event. To quote from the Forestry Commission’s “Guidance for local authorities on producing a comprehensive tree strategy”, these two are “complimentary and should sit side by side as local policy documents. Open spaces strategies cover broader landscape and habitat issues while tree strategies cover the details of management and the benefits and constraints of trees and woodlands in the urban context”. (See section 7 headed “Trees and Open Spaces Strategies” under “local context”)

### **Detailed commentary**

Paragraph 3.5: We are surprised to learn that there are two “garden cities” in this Borough. So far as we are aware, there is only one.

Paragraph 4.1: We understand the concern about placing large growing trees close to property. However, this reluctance should not override the need to place larger growing trees where this is appropriate (eg, where there are green spaces such as Meadow Green or Valley Green, etc). Larger trees are needed as part of the backdrop to the town.

This is important from the point of view of climate change as well. Once again we quote from the Forestry Commission’s “Guidance for local authorities on producing a comprehensive tree strategy”, as follows: “Generally, across the UK there has been a trend of planting smaller scale trees when replacing large broadleaved specimens. This trend does not bode well for climate adaptation if it continues unabated. It is larger species trees that confer the greatest benefits for urban areas in climate adaptation and mitigation measures” (from paragraph four, section headed “tree planting”).

Paragraph 5.2: We disagree with this proposal. Responsibility for the stock should not be delegated beyond the Borough Council. Certainly, Finesse Leisure has failed to demonstrate any commitment to long term management of trees under its control, if the debacle over the lack of management over the Poplars in Stanborough car parks is anything to go by. We have no knowledge of the competence of the Welwyn & Hatfield Community Housing Trust in this regard but would imagine it falls into the same category as Finesse Leisure. We do not feel that responsibility should be passed to either organisation in this town as trees are so central to the garden city.

Both Finesse Leisure and the Welwyn Hatfield Community Housing Trust are “creatures” born out of the Council and we feel organisational changes of this sort should not absolve the Council from retaining control over this whole area.

It is also unclear from the document if the analysis of the tree stock refers to council controlled tree stock or if it includes trees that the Council states are not within its control but are within the control of Finesse Leisure and the Welwyn Hatfield Community Housing Trust.

Whilst we understand that the responsibilities of County authorities are separate from those of the Borough, we would like to see some commitment by County to the locality. In this town we are significantly “tree’d” and we would like to see that reflected in County policy in so far as it relates to Welwyn Garden City. It should be part of this trees strategy that County are informed of the town’s special requirements and that, notwithstanding separate responsibilities, the entire tree stock is seen and managed as a single entity.

Paragraph 6.2: We make no comment as regards Sherrardspark Wood, as we feel the Wood Wardens are properly competent to make any comment they need to and we are supportive of their whole approach.

Paragraph 6.10: We feel that whereas lip service is given to “green infrastructure”, no strategy is indicated to implement it. For example, some idea about how the Panshanger area can be linked in infrastructural terms to the emerging Panshanger Country Park might be very relevant.

Part of the Emerging Core Strategy envisages additional housing in parts of the Borough. It is unclear how this tree strategy may be affected. For example, has the “green infrastructure plan” any wider application than Panshanger? Should not this initiative and others like it be shown in a strategy document of this sort?

Paragraph 7.4: As this strategy document is drafted, we do not think it supports the Borough’s proposed own “Emerging core strategy” in so far as this applies to Welwyn Garden City. That document refers to “maintaining the town’s unique heritage as a garden city”. Founded in 1922, the town has little heritage in the traditional sense to speak of by comparison with, say, Hatfield, other than its urban streetscapes, its housing and town centre, its trees and tree lined roads bounded by closely cut verges. These are the essence of the place –its only and real heritage! This paper is effectively proposing to make radical changes to the way trees are managed in the town – a key part of the fundamental elements that make up the place. That is incompatible with the concept of garden city.

## **Section 2**

This whole section needs to be placed into context.

It clearly reflects management’s operational issues but these have to be placed in their strategic context, which they are not. Sections 9.1 and 9.2 touch on the difficulty of managing trees in the urban environment and this seems to fill centre stage: it will always do so when the strategic context is unstated.

We are well aware there are inevitable conflicts in an urban environment where so many residents live together. However, Council strategy should be sufficiently confident to talk about what the “garden city” stands for and to justify its action. Once again, we are struck by words which are covering the entire Borough, whereas we argue that this town has to be managed differently.

Policy 1: This policy is inappropriate for this town as it fails to recognise what the “garden city” stands for; it is wholly new and, in our view, unacceptable as it now stands. The town stands for a certain formal, indeed idealistic setting and that managed trees are integral to that environment; and mature trees are also essential to maintain the park-like vistas. Pruning of healthy trees is sometimes necessary in this setting to maintain a tree’s correct shape as well as to maintain its health. This needs to be recognised in the strategy.

In some parts of the town specific trees were identified by Louis de Soissons as complimentary to the urban streetscape; this was unique at the time. The proposed strategy should recognise this and ensure that this legacy is maintained. So certain trees or groups of trees have to be maintained to ensure that they fit with the streetscape and that steps are taken to ensure adequate replacements are planted so that as some reach the end of their lives, others are present to ensure the setting is maintained.

From separate correspondence, it is also clear that the strategy for urban trees does not cover how the trees in the “garden city” should be managed. Whilst the proposed document refers to “a holistic approach”, this policy document fails to address this issue.

Policy 3: We were sceptical of the proposal in the last tree strategy about the statements made about managing the Council’s tree stock on a “proactive” basis. We are uncertain whether the proposed words stating that the Council’s entire urban tree stock can be properly inspected on a rolling three year basis. We suggested before that the tree stock should be prioritised and trees managed according to priority. When spread over a longer time frame, this might then be more realistic.

Again this policy fails to address the long term need to cut down trees to ensure that there is a sound replacement policy in place over the longer term. Similarly, the need to replant so that trees are in place as older ones fail does not seem to be addressed here.

Policies 4 to 5: We are expecting the Sherrardspark Wood Wardens to comment on this.

Policy 6: Replanting seems to be confined to “complete scheme” but it does not address a single failure, or cover those areas where single or smaller groups of trees could be usefully planted.

Paragraph 12: There is no proposal to promote a tree planting scheme within the Borough or within the town. Other boroughs do so and we are strongly of the opinion such an approach should now be considered. The Society feels that whereas there are plenty of memorial benches, the Borough Council could usefully promote a scheme to plant “commemorative trees” in memory of not just loved ones who have passed away but also to celebrate births and weddings.

Paragraph 14: Does this section also cover the issue of “heave”?

Paragraph 16: This covers the assistance the Council gets from residents within the town. Various groups are in being but there is some indication from Tree Wardens in the town that they may not be properly communicated with and may not feel properly used.

### **Other points**

Equality Impact Assessment: There is no such assessment attached to these proposals. Our view is that by allowing parts of the garden city to revert to its natural state, there are limitations imposed on access by disabled people and may well suggest an area that is less safe than hitherto. The latter may be regarded as impacting women and children.

Climate change: We would like to see how this might impact the types of tree that would be planted in the future.

Trees left in their natural state: This clearly cannot be in an urban environment. Not only is the issue of the vista and setting relevant, but the ground beneath the tree canopy must also be a concern. This is essential to the wellbeing of the tree. Growth beneath these trees only removes nourishment from the tree itself. This is not addressed in this proposed strategy.

Removal of suckers and obstructions to roads and pathways: The proposed approach is inappropriate in this town. Currently, there are relatively few places where these suckers cause obstruction at present but this will increase with time. It simply adds an air of general neglect to the place; bring the Council into disrepute and foster vandalism on the grounds that no one seems to care.

The proposed policies set out in this Trees and Woodlands Strategy are sometimes quite different from those that appeared in the last Tree Strategy. Some are simply discontinued. The significance of these needs to be explained, as such a difference in strategy is unexpected in such a matter.

Finally, if you compare the policies set out in the previous Tree Strategy with the draft which is now the subject of consultation, a number of policies are on the face of it, simply dropped. These appear to be STPR1 & 3, STPL 1, 2 & 3, and TB1 & TB2 as well as VTM1. There is no explanation given for this.

### **Conclusion**

It would seem to us that this draft strategy document seeks to make profound changes to the way trees are managed in the town. The Society believes will have profound and serious adverse consequences

for the place and its future. This is not spelt out in the document and for that reason it makes the entire draft misleading.

TP 706  
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