

Web site: <http://www.DurhamCity.org>

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6th April 2023

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Dear Mr Kelleher

## **Trees, Woodlands and Hedges Supplementary Planning Document (SPD) - January 2023 Consultation Draft**

Thank you very much indeed for the opportunity to comment on the above draft document. The City of Durham Trust strongly supports the County Council's initiative in producing a range of SPDs to assist with interpretation and application of County Durham Plan policies. We share the desire to secure consistent and focussed planning applications and submissions that address the requirements laid down in policies and to remove the difficulties that have been experienced by Members, officers, applicants and consultees in some cases.

We have posted our answers to the questions using the on-line facility but have also set them out in this letter so that we can express the above contextual paragraph to you.

### **Question 1 Do you agree with the proposed scope and content of the SPD?**

In general, the Trust compliments the County Council on the production of this comprehensive, well researched and informative draft. This builds on many years of exemplary projects by the County Council and participation in regional projects that have increased the tree cover across the County.

As a standalone SPD the scope is sound. The Trust's view is that, while this is helpful, there needs to be greater integration with other SPDs. The relationship of this SPD to the other SPDs needs identifying; a 'road map' would help. Will it also have a connection with other County Council initiatives in relation to conservation areas?

The function of trees and woodland in green infrastructure and the importance that this is now assuming in planning and management considerations should be stressed more. Introducing their role in sustainability early in the document is welcome but could be stressed more forcibly. This should become a strand through the document where applicable. The integral role of green infrastructure in relation to the historic environment and settings also needs more

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exploration. The correlation between woodlands, historic parklands and historic assets is too seldom recognised and, as an example, clearly demonstrated along the Wear Valley. The role of trees and woodland in the green belt is also under represented.

The concentration on trees and woodlands perhaps begs the more wide-ranging question of whether there should be a Biodiversity SPD. This could deal with all green and blue infrastructure and species loss. Low species numbers are an increasing issue particularly in the face of increasing climate change. The SPD often makes mention of these factors but there is a more holistic interface with ecosystems that could be exposed in a further document.

As can be seen by recent cases nationally in relation to tree loss, there is a further dimension in the appreciation of trees by the general public. This might be drawn in under cultural significance. Something of this is within the overall document but the importance generally of intangible attributes in relation to environmental issues is gaining in recognition. Following COVID related lockdowns, the health benefit of green space and trees is also being promoted strongly.

## **Question 2 Do you have any comments on the Background section of the SPD?**

Cross referencing to neighbourhood plans is needed. The Durham City Neighbourhood Plan (DCNP) has a substantial section on green infrastructure in respect of the city.

(See: **DCNP** Theme 2b: A Beautiful and Historic City - Green Infrastructure, Policy G1: Protecting and Enhancing Green and Blue Infrastructure, Policy G2: Designation of Local Green Spaces, Policy G3: Creation of the Emerald Network, Policy G4: Enhancing the Beneficial Use of the Green Belt).

The background would also benefit from noting the National Design Code and guidance together with other government initiatives.

A full listing of currently known sources of trees/woodland/hedgerow strategy and management plans would be useful, including those of the County Council and University.

## **Question 3 Do you have any comments on the Council's proposed approach to planning for trees, woodlands and hedges in development?**

The process outlined is excellent. In the Trust's experience planning applications often stop short at the first stage where only the initial arboriculturist's assessment is submitted. This failure needs to be identified. In addition, the visual alterations caused by proposed tree work and development need to be presented where the tree setting is crucial to making decisions based on impact.

As the economic benefit of ecological services becomes more recognised, so should trees be regarded as having identifiable economic value as part of that analysis. This would only be in relation to more significant developments where often the job and financial benefits of schemes are automatically taken as overriding other environmental and sustainability concerns.

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## **Question 4 Do you have any comments on the Council's proposed approach to avoiding and reducing impacts on existing features?**

Generally, this is sound and a thorough outline of the requirements. The broader scope of impact on green infrastructure and heritage settings needs to be reinforced. In considering compensation often proposals are restricted to limited identification of existing features and relatively minor enhancement. A wider contextual approach would result in better targeting and higher impact for mitigation. Indicating known resources that map existing assets would be valuable, including those held by the County Council.

## **Question 5 Do you have any comments on the Council's proposed approach to integrating existing features into new development?**

A very welcome and thorough section. Reference to other initiatives and policy would be of assistance. This would include Design Codes and policies such as that contained in the DCNP. The inclusion on SuDS areas is most welcome. However, it misses a current problem with submissions where applicants fail to distinguish between SuDS as damp areas, intermittent overflows or open water. A note on the need to identify function in relation to successful planting would be useful. The value of trees generally and in flood prevention is clear but the ground conditions of SuDS areas and their management are often not well understood at the outset.

In relation to Durham City, much of its very valuable tree cover forming the approaches, inner setting and within the City, is self-sown and unmanaged. The health and sustainability of this tree cover is not ensured. There is substantial collective value in the 'ordinary' as well as the exceptional existing tree assets. The same is true of hedgerows. Management of the 'ordinary' in positive ways should be stressed. When applications are submitted and the ownership includes such assets they should be drawn into the application under landscaping proposals for management where reasonably justified as nearby or relating to the development. Owners of such assets should take responsibility for their management.

## **Question 6 Do you have any comments on the Council's proposed approach to new planting?**

A helpful section but cross referencing against other SPDs and initiatives would be useful. This would include the Parking and Accessibility SPD. Parking is currently an issue in relation to tree planting space and street trees in new developments.

At the wider scale, the role of trees in relation to catchment level flood mitigation and prevention is becoming of greater importance. This could be highlighted more under **Page 82** *Priorities for new woodland planting Para 6.89*. Additionally, the role of urban trees can be stressed in relation to flood prevention and mitigation outside of SuDS areas.

There are references to the need for ongoing management, but the Trust considers that this should be emphasised as being as important as planting on the first instance. Funding and agreement of responsibility for street trees is seen as an issue.

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## **Question 7 Do you have any comments on the Council's proposed approach to Tree Preservation Orders and trees in Conservation Areas?**

Another helpful section. Is there scope for relating it to forthcoming conservation area management plans?

The Trust hopes that the above comments are helpful in achieving the welcome purpose of this Supplementary Planning Document. We look forward to the consultation on the final draft.

Yours sincerely

**John Lowe**

Chair, City of Durham Trust