

1 December 2023

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Dear Mr Kelleher

**Trees, Woodlands and Hedges Supplementary Planning Document (SPD)  
October 2023 2<sup>nd</sup> Consultation Draft**

Thank you very much indeed for the opportunity to comment on the above 2<sup>nd</sup> draft consultation document.

As you know from our comments on the 1<sup>st</sup> 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.

The Trust again 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.

We welcome the many improvements that have been made to the document, including those that reflect the Trust's comments on the 1<sup>st</sup> draft. The following comments highlight our continuing suggestions and concerns.

**Scope and content**

The function of trees and woodland in green infrastructure and the importance that this is now assuming in planning and management considerations is now mentioned frequently, but there is still no recognition of the role of trees and woodland in the green belt.

The concentration on trees and woodlands perhaps begs the more wide-ranging question of should there be a Biodiversity SPD? This could deal with all green and blue infrastructure and

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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 explained 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. We suggested that this might be drawn in under cultural significance, but this has not been added. Similarly, we noted that, following COVID-related lockdowns, the health benefit of green spaces and trees is also being promoted strongly, but there is only a passing mention of this in paragraph 6.43.

On a different matter, we advised that 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, but there is no mention of the University in the 2<sup>nd</sup> draft document.

## **Proposed approach to planning for trees, woodlands and hedges**

The account of the Council's proposed approach to planning for trees, woodlands and hedges in development is regarded by the Trust as 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 is now tackled in paragraphs 3.5 to 3.7. However, the Trust believes that, 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.

We commented that, 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. This appears to have not been incorporated in the 2<sup>nd</sup> draft document.

## **Proposed approach to integrating existing features**

We repeat our previous comment that, in relation to Durham City, much of its very valuable tree cover that forms 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.

## **Proposed approach to new planting**

We would still welcome more on the role of trees in relation to catchment level flood mitigation and prevention and, the role of urban trees in relation to flood prevention and mitigation outside of SuDS areas.

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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, with clarity as to the funding for ongoing maintenance over many years ahead. Funding and agreement of responsibility for street trees is also an issue.

## **Typographical points**

Paragraph 1.23 begins with The recognises the important contribution that trees,... We imagine that the missing word between **The** and **recognises** is Plan.

Paragraphs 1.34 to 1.38 seem to be unchanged from the 1<sup>st</sup> draft and thereby set out the wrong "Next Steps". For example, paragraph 1.34 says This document will be consulted on for a period of 6 weeks from 13 January to 24 February.

Paragraph 1.36 says The Trees, Woodlands and Hedges SPD will be taken to the respective Councils' Cabinets for approval before being consulted on for a further six weeks. This implies that several Councils and several Cabinets are involved. Is that is the intended meaning?

## **Conclusion**

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