

## City of Edinburgh Council (2013) Trees in the City (Trees & Woodlands Action Plan)

### CONSULTATION RESPONSE FROM THE LANDSCAPE INSTITUTE SCOTLAND

The Landscape Institute Scotland (LIS), the Scottish branch of the Landscape Institute, welcomes the opportunity to respond to the City of Edinburgh Council Forestry Service "Trees in The City" – Consultation Draft. From the outset we wish to acknowledge our appreciation of the hard work that has been necessary in producing the draft.

The following identifies some broad strategic recommendations for the policies and action plans, as well as identifying minor points that may be useful in producing the final document.

#### Consultation questions taken from the draft:

1. About the document in general:
  - a. Is it clear and understandable? **Mostly. The document may require attention to how the document is presented and structured. Use of English is generally very clear. Some facts may be better presented as bullet points instead of textual lists, esp. in the section on Valuation with i-Tree.**
  - b. Are you aware of any factual errors you want to bring to our attention? **A minor reference to a BS number identified.**
  - c. Is the approach of the document about right in general? **Mostly. There is much emphasis on the ecological and climate change value of trees. More emphasis needs to be made of the financial value of trees in both proposed and existing developments.**
2. Do you support the balance that is struck between the value of trees and the risks and problems they may present? **Possibly more needs to be mentioned about risks, or at least explaining, for example, subsidence and trees.**
3. About the draft policies (section 4): We comment below on some of the policies.

#### General

1. If possible, please add hyperlinks to all referenced reports or projects, especially for all CEC documents and Planning Guidance documents e.g. (Trees and Development).
2. BS 5837:2012 is only briefly mentioned by its number. This is an important document and should be given its full title and where to obtain it. "BS 5837:2012 Trees in relation to design, demolition and construction"
3. There is an opportunity here to provide more guidance aimed at new development, that, as part of the scheme, includes trees within public areas. For example, more information could be provided covering the on-going maintenance requirements of trees immediately after planting – for example, formative pruning and watering, or minimum recommended sizes for street trees or other trees that are planted in public areas.
4. Likewise, list The Landscape Institute and The Arboricultural Association as professional organizations that provide impartial advice and guidance for the design, planning, planting and management of trees and woodlands; especially for private home owners and developers.
5. Overall, it is considered that the document may need re-structuring as it does seem to jump around topics and repeat itself at times, especially the introductory sections.
6. Page 5. Delete "range of other benefits" from the summary bullet point list on page 5 and add "provide visual amenity and improved character to an area leading to potentially increased property values"
7. Page 5 Section 1.2 – this might read better if placed *after* all the benefits have been listed.

### The Valuation of Trees

8. Page 6 – paragraph 2 refers to CAVAT acronym before it is defined in paragraph 3. CAVAT is again discussed later, perhaps it might be better not to refer to valuation so early in the document?

9. Page 9 – Problems posed by trees should not be in the “Benefits of Trees” section. Perhaps have a sub-section for this topic.

10. Section 2.3 The Valuation of Trees – please add references to the systems mentioned (Helliwell, CAVAT, i-Tree)

11. Section 2.4 i-Tree Eco Valuation – last paragraph p12 – can these species list be presented as a bullet point list?

12. Page 13 – talks about the CO2 sequestration values of trees. Please can you put this into some sort of context? This is nearly covered in paragraphs 5 and 6 on page 13 but the figures used could be put into a more easily understood context: For example – “*The carbon stored in the trees of Edinburgh is equivalent to the annual emissions of 20,801 people, whilst the net carbon sequestered is equivalent to the annual emissions of 674 people*” What does this mean? Is carbon sequestration different to carbon storage?

13. If Edinburgh’s trees sequester the equivalent of 135million kilometers of car usage, do we know how many million kilometers of car travel is actually driven? Are we in “credit” ? Do we sequester more CO2 than we produce by driving cars (or even that generated by just Lothian Buses?) This direct comparison may provide the reader with a more readily understandable way to identify the real value of trees.

14. P13 paragraph 5 – this seems overly technical and complicated to follow. Where is the ‘low’, ‘central’ and ‘high’ scenarios introduced and explained?

15. P13 paragraph 5 – the traded values in £ - which we assume reflects the “Importance Value” – how is this actually realized through carbon-trading scheme(s)?

16. Generally, there is an opportunity in this document to state more about the increased property values as well as CO2 sequestration and biodiversity. The positive impact of broadleaved woodland on property prices is well known, with increases in property values ranging from 5 – 18%. The larger the trees are then the greater their proportional value. See for example:

[http://www.forestry.gov.uk/pdf/eng-casefortrees.pdf/\\$file/eng-casefortrees.pdf](http://www.forestry.gov.uk/pdf/eng-casefortrees.pdf/$file/eng-casefortrees.pdf)

*“Research by CABE Space in ‘Does money grow on trees?’, CABE 2005, reported that, in the 8 UK parks they studied, proximity to them added a premium to house prices of between 5-7%; While a US study of parks claimed house values were between 10-20% higher; The value of US properties in tree lined areas was estimated as being 6% higher by ‘Urban Forest Values: Economic Benefits of Trees in Cities’, Wolf K, University of Washington College of Forest Resources, Factsheet 29, 1998; ‘Benefits of community trees’, Nowak DJ, USDA Forest Service General Technical Report; ‘The contribution of trees to residential property value’, Morales DJ, Journal of Arboriculture 6, 1980”*

17. Finally, it is also possible to use the CAVAT, i-Tree methods to predict a tree's subsequent value at maturity and demonstrate how this might positively enhance a development's future resale value.

18. Table 1 – is ENV 12 missing?

19. Page 29 bullet points - replace *they* with *the trees*?

- Survey its trees
- Have this done by a competent person

- Take reasonable action to ensure that the trees are reasonably safe

20. Page 29 “*The Council manages its own trees via the City of Edinburgh Council Forestry Service in Parks & Greenspace, which utilises a specialised tree management database called Ezytreev*”. A suggestion – could this database be freely available online for viewing? Is there a mechanism to easily allow the general public and/or professionals to report damage to trees etc.? If so, this should be mentioned.

21. Page 29 should the following be above “Trees on Private Land” sub-heading as it refers to Council trees and parks?

*Information on the Council's management of trees and woodland can be found on the Council Website at the following location:  
[http://www.edinburgh.gov.uk/info/495/parks\\_gardens\\_and\\_open\\_spaces/767/trees\\_and\\_woodlands](http://www.edinburgh.gov.uk/info/495/parks_gardens_and_open_spaces/767/trees_and_woodlands)*

22. Page 32. BS5837 should read BS5837:2012

23. Page 32. *Policy 6: The Council will consider applications from private owners to alleviate amenity reduction or nuisance problems on the basis that they will fund the works...* Suggest change to “the private owner will fund the works”

24. Page 33. BS3998:1998 is now BS3998:2010

25. Page 40. 8.8 Telephone Wires. Why is this? If the tree is on council land then shouldn't the council be taking more responsibility for something like this? The poor consumer / house holder will be sent in circles with this policy, with the telephone service provider saying that it is the councils problem as it is their tree etc. Even if the tree is privately owned the council should still be taking an active interest as there may be a TPO on the tree or the tree may be in a conservation area. If the council are seen not to assist - or simply to advise - in these type of issues and homeowners take action into their own hands then this would potentially result in unlawful lopping and reinforce the incorrect publicly held perception that trees generally are not valued.

26. Page 41. 8.13 refers to “*arborist*” – is the preferred term now *arboriculturist*?

27. Page 42. 9.0 Dangerous trees and tree-related emergencies. “*The Council operates an emergency call-out system in the event of dangerous streets*” change to “*dangerous trees*”

28. Page 42 – the list that identifies typical situations where a tree requires immediate attention is **very useful** and should be placed on the Council website within the *Trees and Forestry* pages under “Services A-Z” [http://www.edinburgh.gov.uk/a\\_to\\_z/service/940551/](http://www.edinburgh.gov.uk/a_to_z/service/940551/) also add an entry “Dangerous Trees”.

29. Page 45 – Please provide hyperlink to the Dutch Elm Disease report.

30. Page 45. Policy 40. What happens if private land owners fail to undertake the recommended sanitation action for felling diseased trees? What steps will the council take to ensure that the disease will not spread further because of untreated privately owned trees?

31. Page 46. Paragraph 3 talking about Heritage or Veteran Trees. “*Trees can be made safe...*” change to “*If required, veteran trees can be made safe...*”? Also, does this apply to privately owned trees? Will the council work on privately owned trees? Please clarify.