

# Transport and Environment Committee

10.00, Tuesday, 14 January 2014

## Trees in the City – Finalised Policy and Action Plan

Item number	7.6
Report number	
Wards	All

### Links

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Coalition pledges	<a href="#">P48</a> , <a href="#">P50</a>
Council outcomes	<a href="#">CO7</a> , <a href="#">CO15</a> , <a href="#">CO18</a>
Single Outcome Agreement	<a href="#">SO1</a> , <a href="#">SO2</a> , <a href="#">SO4</a>

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# Executive summary

## Trees in the City – Finalised Policy and Action Plan

### Summary

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The purpose of this report is to note the outcome of public consultation on the draft 'Trees in the City' document and to request approval for the revised and finalised document.

The draft 'Trees in the City' document was approved for consultation by Committee on 4 June 2013. The consultation period ended on 23 September 2013. The policies contained in the document will guide the management of trees and woodlands in the city, and set out an action plan designed to prioritise resources towards key actions.

Amendments to the document have been made in response to comments received during the consultation. These are described below.

The following figures show the results of consultation questions. There was a clear majority in support of the draft document overall.

Total responses received from individuals and groups or organisations:

Individual	201
Group or Organisation	23

- 88% agreed that the document is clear and understandable.
- 79% agreed that the approach of the document is about right.
- 77% support the balance that is struck in the document between the value of trees and the risks and problems they may present.
- 91% agree that the policies are clear.
- 77% agree that the policies are reasonable.
- 78% agree that the proposed actions are appropriate.
- 73% agree with the priorities.

The report also responds to the 'A Tree for Every Child' motion by Councillor Booth, which was approved by the Transport and Environment Committee at its meeting on 27 August 2013.

## Recommendations

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It is recommended that Committee:

1. Notes the outcome of the consultation.
2. Approves the resulting 'Trees in The City' policy and action plan.
3. Gives direction on how it wishes to proceed with 'A Tree for Every Child'.
4. Agrees that the motion from Councillor Booth is discharged.
5. Notes that a further report detailing progress on the 'Tree for Every Child' project will be made to this Committee in due course.

## Measures of success

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For the purposes of the consultation on the 'Trees in the City' document appropriate measures used were:

- Number of consultation responses received.
- Number of survey responses completed.

## Financial impact

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Impacts on revenue budgets can be contained within existing provision. The estimated capital cost of the 'Tree for Every Child' proposal is £100,000 per year which is not currently budgeted. For other actions, detailed cost estimates will be brought forward in due course for consideration.

## Equalities impact

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An Equalities Impact Assessment has been carried out. The consultation highlighted two issues:

1. Elderly, disabled or low income residents who find themselves unable to afford necessary works to trees on their property. Possible solutions are currently being investigated via charitable organisations.
2. There is currently no legislation that covers an individual's "right to light". Where an individual or group highlights an issue, if it is a privately owned tree it would be reviewed by the Planning Service. In the case of a Council owned tree, it would be assessed by Parks and Greenspace. If there are no Tree Preservation Orders or Conservation Area restrictions, and if professional opinion is that the health of the tree will not be negatively impacted, then the individuals may get permission to have reduction work carried out privately.

## Sustainability impact

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The proposals in this report will help achieve a sustainable Edinburgh by ensuring that trees are properly managed and valued as components of the fabric of the city. The benefits that they will provide in terms of carbon storage, sequestration and pollutants removal from the atmosphere can also be optimised.

## Consultation and engagement

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Following Committee approval of 4 June 2013 to undertake a public consultation on the draft policy and action plan, the following steps were taken:

- Communications were issued via Neighbourhood Partnerships and sent directly to Friends of Parks groups, amenity societies, government agencies and relevant non-government agencies.
- The consultation was posted on the City of Edinburgh Council website under the section “Have Your Say”. This included a downloadable PDF of the draft policies and action plan with a link to the online survey.
- The Council website also advised how to obtain hard copies if required.
- The consultation ran from 17 June to 23 September 2013 for a period of 12 weeks.
- 145 individuals and groups or organisations were e-mailed directly inviting them to respond to the ‘Trees in the City’ consultation.
- A total of 224 comments were received. These can be broken down into the following categories:

Individual	201
Group or Organisation	23

This is considered a good level of response for this type of consultation, and it can be concluded that the consultation process was successfully carried out.

## Background reading / external references

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1. ‘Trees in the City’ - report to the Transport and Environment Committee 4 June 2013: [http://www.edinburgh.gov.uk/download/meetings/id/39388/item\\_7\\_15-trees\\_in\\_the\\_city](http://www.edinburgh.gov.uk/download/meetings/id/39388/item_7_15-trees_in_the_city)
2. ‘Trees in Council Ownership’ - report to the Transport, Infrastructure and Environment Committee 13 September 2012:

[http://www.edinburgh.gov.uk/download/meetings/id/36449/item\\_no\\_6\\_2-management\\_of\\_trees\\_in\\_council\\_ownership](http://www.edinburgh.gov.uk/download/meetings/id/36449/item_no_6_2-management_of_trees_in_council_ownership)

3. 'Edinburgh and Lothians Forestry and Woodland Strategy' – report to the Planning Committee 4 October 2012, and Edinburgh and Lothians Forestry and Woodland Strategy 2012 – 17 (as an appendix to the above report):  
[http://www.edinburgh.gov.uk/download/meetings/id/36731/item\\_10\\_e\\_and\\_l\\_for\\_forestry\\_and\\_woodlands\\_strategy\\_report](http://www.edinburgh.gov.uk/download/meetings/id/36731/item_10_e_and_l_for_forestry_and_woodlands_strategy_report)
4. Scottish Forestry Strategy (Forestry Commission Scotland):  
<http://www.forestry.gov.uk/sfs>
5. Central Scotland Green Network: <http://www.forestry.gov.uk/forestry/inf-82key5>
6. National Tree Week: <http://www.treecouncil.org.uk/community-action/national-tree-week>

# Trees in the City – Finalised Policy and Action Plan

## 1. Background

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- 1.1 'Trees in the City' draws together a number of strands relating to trees into one document. This report also seeks to discharge an outstanding remit from the Transport, Infrastructure and Environment Committee meeting of 13 September 2012. The principal elements of this document are:
- Policies that will inform how the Council manages trees and woodlands in its ownership.
  - Guidance to inform the public on tree-related matters and on their rights and responsibilities.
  - The Council's response to the Forestry Commission Scotland's Edinburgh and Lothians Forestry and Woodland Strategy 2012-17 (ELFWS) launched in October 2012 which was approved by Planning Committee on 4 October 2012.
  - Recent research evidence of the environmental benefits that trees provide, which have been valued financially using a new model.
- 1.2 This report also seeks to discharge the motion by Councillor Booth which was approved by the Transport and Environment Committee at its meeting on 27 August 2013 'A Tree for Every Child', which was that Committee:
1. Notes that tree planting has educational, health, well-being and environmental benefits;
  2. Notes that every year many trees are lost due to development, disease and age;
  3. Notes that according to information from the General Registers of Scotland and Children and Families, around 5,600 children are born or adopted in Edinburgh each year;
  4. Notes the success of 'Plant aTree for Every Child' schemes in many other parts of the world including many towns and cities of the United States, as well as in towns and cities of Wales and England; and
  5. Agrees to receive a report on the costs, benefits and feasibility of establishing a city-wide scheme to plant a tree for every child born or

adopted in Edinburgh each year including the feasibility of partnership working to deliver this.

#### Decision

1. To approve the terms of the motion and that the issues raised would be considered as part of the overall consultation on the Tree and Woodland Action Plan.
2. To note that a report would be submitted to the Committee in 2 cycles which would include details of associated revenue and capital costs.

## 2. Main report

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- 2.1 On 4 June 2013 the Transport and Environment Committee approved the release of the draft 'Trees in the City' document for public consultation. Previously the document had been considered at the Transport and Environment Sub-Committee on 10 May 2013. The document was made widely available and comments were invited up until the closing date of 23 September 2013.
- 2.2 224 comments were received and 62 people completed the on-line survey. This is considered a good level of response for this type of consultation. The breakdown of responses was:

Individual	201
Group or Organisation	23

- 2.3 Responses were received from a range of the key agencies and groups including:
- Forestry Commission Scotland
  - Scottish Natural Heritage
  - The Landscape Institute Scotland
  - The Scottish Wildlife Trust
  - Woodland Trust Scotland
  - The Edinburgh & Lothians Greenspace Trust
  - Lothians & Fife Green Network Partnership
  - Parks Friends Groups
  - Community Councils

2.4 The results of the on-line survey were as follows:

- 88% agreed that the document is clear and understandable.
- 79% agreed that the approach of the document is about right.
- 77% support the balance that is struck in the document between the value of trees and the risks and problems they may present.
- 91% agree that the policies are clear.
- 77% agree that the policies are reasonable.
- 78% agree that the proposed actions are appropriate.
- 73% agree with the priorities.

The number of responses to the survey was 62. This response suggests that the consultation was met with broad agreement.

2.5 The consultation comments have been tabulated at Appendix 2. Alongside each comment is a draft response which is either to explain how the finalised document has been amended, why no amendment has been made, or simply to note the comment. In some cases, extended comments have been edited for practicality. The majority of private individuals who commented opted to remain anonymous for the purposes of this reporting stage and therefore names have been omitted.

2.6 The comments received have led to a number of proposed revisions to the document, of which the significant ones are outlined below:

- A preface statement has been added clearly setting out the scope of the document – in particular making clearer the boundaries with planning policy as it relates to trees and describing the relationship between the document and the High Hedges bill which will be the subject of a report to this committee.
- A glossary has been added.
- The limitations of the Council's powers regarding privately owned trees have been more fully described.
- Revision to Policy 10 - Leave deadwood intact where feasible in woodlands.
- Revision to Policy 31 - Clarification of policy relating to trees and telephone wires.
- Revision to Policy 41 – Detailing the protection of young trees.



- New Policy 20 added relating to the protection of mature trees in relation to construction or excavation works.
- New Policy 11 added relating to the management of ivy and trees.
- The explanation of Common Law rights as they relate to owners pruning roots from a neighbouring tree has been clarified.
- References to British Standard numbers and their titles have been corrected.
- Further advice regarding tree roots and subsidence of buildings has been added.
- The 'Tree for Every Child' proposal has been included in the Action Plan.
- Removal of repetitions, correction of minor errors and redrafting to improve readability.

2.7 In addition, it is proposed to provide a summary version of the document and make this available.

### **A Tree for Every Child**

2.8 'A Tree for Every Child' involves the planting of a tree for every baby born in a particular city or part of the country and is a variant of 'Plant a Tree' schemes which have been growing in popularity in a number of different countries across the world as means of raising awareness of climate change and combating carbon emissions. Many 'Plant a Tree' schemes operate on a self funding basis through donations and sponsorship. There are a number of publicly funded 'Plant a Tree Schemes including City of New York's 'Million Trees NYC' project which aims to plant a million street trees through a combination of planting by the city authority, providing trees free of charge to owners to plant outside their properties and through requiring developers to plant trees as part of any new development. In the UK the Mayor of London's office is running a scheme to plant 10,000 street trees in conjunction with the Forestry Commission and Groundworks London. The Welsh Government launched it's 'Plant' scheme in 2008 which aims to create new woodlands and a national forest by planting a sapling for every new baby born or adopted in Wales. The Welsh Government estimate that it costs £8 per sapling with the actual planting carried out by school children.

2.9 As detailed in Appendix 1, the city's tree population is not static. Many publicly-owned trees have to be removed because they become decayed and are rendered unsafe. Currently around 1000 trees are lost to Dutch elm disease every year, and the effect of Chalara ash disease is still to be felt. Edinburgh is still partially dependent for its treescape on trees planted in Victorian times, and these are increasingly elderly.

2.10 New trees need to be planted every year to make good losses. At present, planting is carried out on a site-by-site basis or as part of site management plans

but there is currently no overarching approach or budget to support tree planting. Over the past three years the Council has planted an average of 268 trees per year, but in the current financial year there is no tree planting due to there being no budget available. As detailed in 'Trees in the City', urban trees are a key component of the sustainable city of the future, and it is appropriate that the planting of trees be linked symbolically with the birth of future citizens. Around 5,600 children are born or adopted in Edinburgh each year, which would be an appropriate number of trees to be planted in the city each year as a minimum.

- 2.11 These would include streets, parks, gardens, schools, woodlands and amenity land and cover the replacement of losses as well as aim to enhance the city. The precise specification would vary from site to site, and the availability of sites will vary from year to year. For example, trees planted in parks tend to be larger and therefore more expensive at around £300 each. Street trees could cost substantially more depending on whether pavements need to be excavated, but a figure of £1000 per tree would be useful for budgeting. Trees planted in woodlands or schools would be smaller, costing less than £5 each and are capable of being planted by adult volunteers, children and young people.
- 2.12 As an illustration of what could be achieved in a programme for 2014/15 could be as follows:
- 115 extra-heavy standard trees in parks and gardens – mixed species.
  - 50 street trees – selected species and varieties.
  - 5435 whips/saplings in woodlands, schools, gardens and other green spaces – predominantly native trees.

If 'A Tree for Every Child' were to proceed on this basis it is estimated that the cost would be approximately £100,000 per year with 50% of the costs being attributable to the planting of street trees. The planting of 'A Tree for Every Child' could begin with an event coinciding with National Tree Week 2014, with the participation of communities and the engagement of partners such as the Woodland Trust. National Tree Week is organised by the Tree Council and celebrated across the country. It provides a focus for communities and schools to organise their own planting events. Normally it is held during the last week of November each year, this year being 23 November to 1 December.

- 2.13 It will not be feasible to have each tree tagged with a child's name or otherwise individually associated with a particular person. The administrative burden of managing such a scheme would be extremely onerous, and it would be impossible to offer certainty to parents or children on individual tree health or survival. If the scheme were to proceed it is proposed that the that tree planting is presented as a communal activity in which the future benefits will be shared by all.
- 2.14 Tree planting is generally funded through the parks capital programme but due to reducing capital resources there is no provision for tree planting. If committee

wish to proceed with 'A Tree for Every Child' capital resources would have to be identified from within capital resource that are already under significant pressure, or to agree on scheme that focuses only on planting of saplings which would be cheaper to fund (approximately £30,000 per annum) or investigate potential sources of external funding and the feasibility of a self-funding scheme.

- 2.15 In addition, it is proposed that further information is sought about how the scheme has operated elsewhere including the Welsh Government's 'Plant' scheme, and that the Council should seek to have discussions with the Scottish Government on how the Tree for Every Child project might be delivered on a Scotland-wide basis. The outcome of this information gathering and these discussions will be brought back to this Committee for consideration.
- 2.16 Councillor Booth has been consulted on this report and is broadly supportive of its findings.

### **3. Recommendations**

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- 3.1 It is recommended that Committee:
1. Notes the outcome of the consultation.
  2. Approves the resulting 'Trees in The City' policy and action plan.
  3. Gives direction on how it wishes to proceed with 'A Tree for Every Child'.
  4. Agrees that the motion from Councillor Booth is discharged.
  5. Notes that a further report detailing progress on the 'Tree for Every Child' project will be made to this Committee in due course.

## **Mark Turley**

Director of Services for Communities

## Links

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<b>Coalition pledges</b>	P48 - Use Green Flag and other strategies to preserve our green spaces.
	P50 - Meet greenhouse gas targets, including the national target of 42% by 2020.
<b>Council outcomes</b>	CO7 - Edinburgh draws new investment in development and regeneration.
	CO15 - The public is protected.
	CO18 - Green - We reduce the local environmental impact of our consumption and production.
<b>Single Outcome Agreement</b>	SO1 - Edinburgh's Economy Delivers increased investment, jobs and opportunities for all.
	SO2 - Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health.
	SO4 - Edinburgh's communities are safer and have improved physical and social fabric.
<b>Appendices</b>	1. 'Trees in the City' – Finalised Document.
	2. Tabulated comments from the public consultation with proposed responses.

# Trees in the City

Revised Trees and Woodlands  
Action Plan - January 2014

# Trees in the City

## Revised Trees & Woodlands Action Plan

### Objectives and scope of this document

This document has the following general objectives:

1. To set out clearly policies that will inform how the Council manages trees and woodlands in its own ownership;
2. Provide guidance to inform the public on tree-related matters and on their rights and responsibilities;
3. To set out the Council's action plan in response to Forestry Commission Scotland's Edinburgh & Lothians Forestry and Woodland Strategy 2012-17 (ELFWS), which was approved by Planning Committee on 4 October 2012;
4. Present recent research evidence of the financial benefits that trees provide (the i-Tree study).

### Scope of the document:

The document does not attempt to create policies on trees in relation to planning or development control. These policies and guidelines are set out elsewhere. Whilst the laws governing trees in conservation areas and those covered by Tree Preservation Orders are a part of Planning legislation, the content about them has been included in this document to help inform the reader.

The High Hedges Act is not addressed here because at the time of writing it has not yet become law in Scotland. Guidelines for the application of this Act are still in development by the Scottish Government. A report to Council on the implications of the High Hedges legislation will be brought forward in due course.

## Glossary of terms referred to in the text

**BS 3998:2010** 'Tree work – Recommendations' – the latest British Standard applying to work carried out on trees.

**BS 5837:2012** 'Trees in relation to design, demolition and construction. Recommendations' - the latest British Standard applying to tree protection in relation to works carried out close to trees

**CAVAT** - Capital Asset Value for Amenity Trees is a method for valuing trees as public assets taking in cultural, social and environmental factors as well as visual amenity contribution.

**Conservation Area** – a planning designation applied to parts of the city which confers a measure of protection over the trees located within it.

**Ecosystem services** – a wide range of processes and resources delivered by ecosystems that are of benefit to people, such as removal of atmospheric pollution, storm water storage etc.

**ELFWS** - The Edinburgh & Lothians Forest & Woodland Strategy. A document produced by Forestry Commission Scotland to guide development of forests and woodlands in the Lothians, with counterpart strategies covering other local authority areas.

**Extra-heavy standard** – a tree grown in a nursery usually 16-18 cm girth or more and generally supplied with a rootball if specified.

**FCS** – Forestry Commission Scotland, the government's forestry regulation body & manager.

**Helliwell valuation method** – an aid to practical planning and management of woodlands and urban trees by evaluating their relative contribution to the visual quality of the landscape.

**i-Tree eco valuation** – a model developed by the US Forest Service to quantify a selection of ecosystem services delivered by trees at the city scale.

**LFGNP** – Lothians & Fife Green Network Partnership – made up of Councils and governmental agencies to promote green network development

**Millennium woodlands** – In the document this means woodlands which were planted in Edinburgh in the period 1997-2001 as a part of the Millennium Forest project.

**PM10** – Particulate matter of very small size (<10 µm [micrometers]). The principal source of airborne PM10 matter is road traffic emissions, particularly from diesel vehicles.

**Transplant** – a young tree 2 or 3 years old grown in a nursery usually 30 – 45 cm tall

**TPO** – Tree Preservation Order – A designation made under planning legislation to protect trees either individually or in groups.

**Tree Protection Charter** – a Council document which sets out the process for protecting trees, and the levels of service which members of the public and others can expect from the Council regarding tree protection and works to protected trees.

**UFS** – the Urban Forestry Strategy 1991 and approved by the former City of Edinburgh District Council. This provided guidance on the development and management of trees and woodlands in the city.

**VTA** – Visual Tree Assessment. This is a methodology for systematic assessment of tree condition developed by Claus Mattheck.

**Whip** – a young tree, 3 years old or more, usually 60 – 120 cm tall

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- 4.0 Draft tree management policies
- 5.0 5 year action plan

### Appendix 1

Summary of current planning policy framework relating to trees and woodlands



# 1 The benefits of trees in the city

## 1.1 Introduction

Trees make a vital contribution to quality of life in Edinburgh, both as street trees and as a component of parks, gardens and woodlands. They provide sensory stimulation, visual relief and aesthetic pleasure that changes with the seasons, help to provide the setting for buildings and screen unwanted views, and reduce the impact of noise.

They act as reservoirs for biodiversity, and for many citizens are the most obvious and readily available form of contact with nature. Surveys indicate that Edinburgh citizens value daily contact with nature very highly.

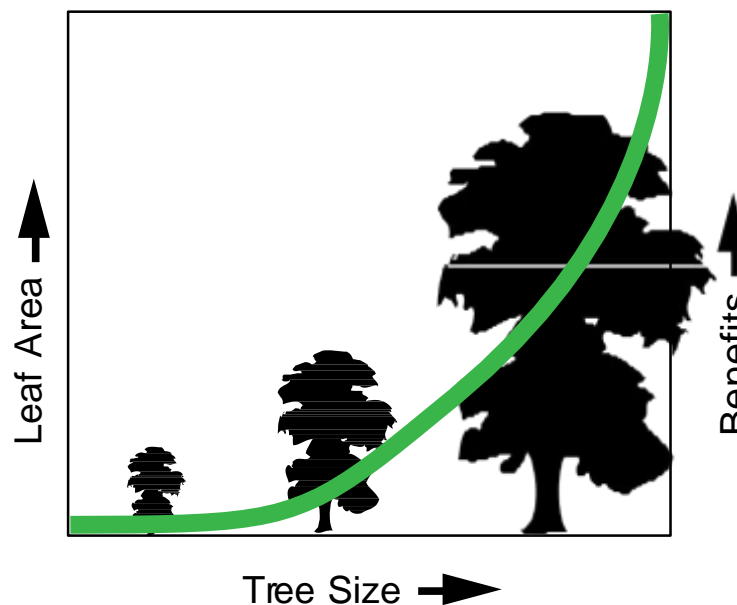
Trees remove pollution from the atmosphere, and perform a service in removing particulates known as PM10s thereby improving air quality. Tree roots may help to store storm water thereby alleviating localised flooding. Trees provide shade in summer and shelter in winter. As trees grow they convert atmospheric CO2 into wood-storing carbon, lessening the rate of climate change.

The benefits of trees may be summarised as follows:

- Improving biodiversity
- Storing CO2 from the atmosphere
- Providing shelter in winter and shade on hot days
- Health benefits – including removing harmful particulates from the air
- Relieving localised flooding
- A range of other benefits

## 1.2 Which tree is most valuable?

As trees increase in age and size, their benefits increase exponentially.



This means that it is of key importance to conserve and maintain existing trees, especially where they are old and large. Replacing old trees with newly planted ones is of course essential, but for new trees to replicate the benefits provided by older larger trees they would need to be replaced at a rate of 40 to 1, or alternatively wait for 30 – 50 years for their value to increase naturally. Older and larger trees in the City are currently under-valued and should not be removed unless there are compelling reasons to do so.

## 1.3 Benefits of trees

### Contribution to landscape quality, screening eyesores and enhancing buildings

Most people enjoy seeing and being amongst trees. The inclusion of trees in developments can transform the appearance of sites for the better and create a more diverse and pleasing environment. The positive impact of broadleaved woodland on property prices is well documented, with increases in property values ranging from 5% – 18%. The larger the trees are, then the greater is their proportional value.

Industrial areas and employment sites with access to natural greenspace can have more productive and satisfied employees. Retail areas with trees perform better than shopping centres without them. The tourist attraction of wooded areas is widely acknowledged, with many local economies benefiting significantly. As a consequence of all of these contributions, commercial and urban areas with good tree cover tend to attract higher levels of inward investment.

### Countering climate change

“Trees are a key part of our armoury to combat climate change”

Trees naturally absorb CO<sub>2</sub>, a key greenhouse gas, through the process of photosynthesis. Thus trees help to create a significant carbon sink, sequestering carbon to benefit everyone through a natural process. The UK's forests and woodlands contain around 150 million tonnes of carbon and act as an on-going carbon sink by removing a further 4 million tonnes of it from the atmosphere every year. It has been calculated that a 33% increase in UK woodland cover would deliver an emissions abatement equivalent to 10% of greenhouse gas emissions by the 2050s.

The adoption of low-carbon options, such as timber in construction, is also beneficial. Every cubic metre of wood that is used as a substitute for other building materials saves around 2 tonnes of CO<sub>2</sub>. More extensive use of timber in this way could store 10 million tonnes of UK carbon (equivalent to 37 million tonnes of CO<sub>2</sub>) by 2020.

The increasing use of trees as a source of renewable energy (woodfuel) has a further substantial contribution to make. By replacing fossil fuels, sustainably produced woodfuel could reduce CO<sub>2</sub> emissions by as much as 7 million tonnes per year within 5 years. Not surprisingly therefore, the Forestry Commission actively encourages tree planting in both urban and rural areas to support the fight against climate change.

### Tempering the effects of severe weather

The capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems. By moderating temperatures through a combination of reflecting sunlight, providing shade, and evaporating water through transpiration, trees serve to limit the ‘urban heat island’ effect. Trees moderate local microclimates – urban areas with trees are cooler in summer and warmer in winter and can help to alleviate fuel poverty. Well-positioned trees also improve the environmental performance of buildings by acting as a buffer or ‘overcoat’, reducing thermal gain in summer.

### Improving air quality

Local air quality is improved as trees cut the level of airborne particulates and absorb nitrogen dioxide, sulphur dioxide and ozone.

Monitoring for PM<sub>10</sub> is carried out at eight automatic Air Quality Monitoring Stations (AQMS) strategically located across the city. Data from monitoring in 2009 and 2010 is reported, respectively, in the 2010 and 2011 (draft) Air Quality Progress Reports for City of Edinburgh Council.

Whilst monitoring data demonstrates that the UK/EU Standard for PM<sub>10</sub> (40 µg/m<sup>3</sup>) is not being exceeded and PM<sub>10</sub> levels across the city are well below this standard, the Scottish Government has specified a more stringent Air Quality Standard for PM<sub>10</sub> (18 µg/m<sup>3</sup>) in Scotland. Monitoring data suggests that the majority of heavily-trafficked routes within the city centre area are likely to exceed the Scottish Government's

annual objective for PM10. Therefore, the Council must continue working towards containing and reducing levels of PM10, wherever practicable. The evidence is that appropriately sited and designed tree planting will assist in reducing PM10 and other pollutants.

### **Biodiversity**

Trees host up to 5,000 different species of invertebrate that, in turn, form crucial links in a healthy food chain that benefits birds and mammals. Lines of trees can form the basis for biodiversity networks, or links between habitats; and woodlands provide pockets of wildlife that become more biodiverse over time, as well as providing opportunities for people to be closer to nature.

### **Reducing Greenspace management costs**

Greenspace with good levels of tree cover may be less costly to maintain than grassed areas. Cutting grass by gang mower is amongst the cheapest form of active maintenance, with annual costs of around £1600 per hectare per year. However, gang mowing is only possible on larger areas. Woodland is cheaper to maintain, ranging from £250 per hectare per year to £1450 per hectare per year for the more complex type of woodland planting. It is the diversity and other benefits described elsewhere in this section that tip the balance towards tree planting. This is not a recipe for the wholesale blanketing of parks and green spaces with woodland, rather an indication that modest increases in tree cover of the sort advocated in the Edinburgh Living Landscapes project will bring some cost savings whilst at the same time creating additional benefits.

### **Health benefits**

The presence of trees often encourages people to exercise, thereby reducing the incidence of heart attacks and Type 2 Diabetes. Trees absorb considerable quantities of airborne pollutants and the resulting cleaner air cuts asthma levels.

Wooded environments are known to calm people, relieve stress and provide a spiritual value that supports improved mental health and

wellbeing. When they can see trees from their beds, patients' recovery times are faster as well.

The general health dividend provided by trees has been scientifically proven – Dutch research shows neighbourhoods with good tree cover are, statistically speaking, significantly healthier than less green urban areas. The positive benefits of trees do not stop there. Because they provide increased shade, the risk of skin cancer in tree-covered areas should be lower.

### **Food Growing**

The growing of fruit trees in urban areas is increasingly popular, in line with the greater interest in local food production. Apples, pears, plums and other fruiting species can all be grown successfully in Edinburgh and whilst they do require management, they do not require particularly specialised conditions or care. Fruit trees can be an important part of community gardens and allotments.

### **Providing useful by-products**

Urban trees provide a range of different by-products – from small amounts of timber, to mulch and as mentioned above, fruit. Woodfuel is of growing importance, even in urban areas.

### **Problems posed by trees in urban areas**

From semi-maturity onwards trees may present a number of problems, varying in severity from nuisance, such as unwanted shading and blocking views, to danger to life, limb and property due to defective limbs, roots, the effects of disease, or extreme weather. In most cases these issues can be effectively managed. There are variations between species and varieties in the probability and severity of problems occurring, and it is of key importance to select the right tree for the right place. However trees grow naturally from seed or by suckers and in some locations the growth of trees in unsuitable locations may lead to significant problems.

In order to manage tree-related problems, a comprehensive range of tree management policies have been drafted which are intended to provide a reliable and sensible framework for the management of the Council's tree stock.

These draft policies form section 4 of this document.

**References to the above quoted research can be found in 'The Case for Trees', forestry Commission, 2010.**

[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)

## 2. The status of trees in Edinburgh

### 2.1 Overview

Recent survey work carried out by Forest Research estimates that there are 638,000 trees in Edinburgh. The Council owns a large amount of land in Edinburgh, the largest parts of which are woodlands, parks and open land, each of which has trees to a greater or lesser extent.

It is difficult to know reliably whether the total number of trees in the City is increasing or decreasing, as accurate population counts have never been carried out, largely due to the difficulty and expense. Data does exist however – the Forestry Commission carries out survey work and estimates that 17% of Edinburgh's land area is covered by tree canopies. For comparison, Scotland as a whole currently has 17.6% tree cover. For cities and towns, the mean figure for England and Wales is 11.8%, which would suggest that Edinburgh is relatively well-treed. However, much of Edinburgh's tree canopy cover is concentrated in large woodlands, such as Corstorphine Hill (76 hectares) and the Hermitage of Braid (58 hectares). The number of trees in streets is relatively small (9,000 or 1.4% of the total). In London and the south-west, street trees comprise between 2 and 14% of canopy cover.

The contribution of privately owned trees to canopy cover in the city is significant. For example districts such as the Grange, which have virtually no public open space, are well-treed because there are many mature trees located in domestic gardens.

Survey work carried out in the 1990s indicated a street tree population of around 11,000 individuals. When street trees were resurveyed in 2007, this population had fallen to around 8,626. The current population of street trees is 8,550.

There are a number of reasons for the reduction in street trees, but essentially the problem is that they are not always replaced when they die

or are felled. It can be expensive to excavate tree pits at the roadside, and regulations affecting road occupation may have made it more difficult to carry out planting operations. There is increasingly a risk-averse culture which tends to reject the planting of trees near to utilities, and may also mean that tree pits on pavement which are not promptly replanted may be tarred over.

The reducing number of street trees is a matter for concern, for as will be discussed below, trees in streets are most effective in delivering the types of benefits we increasingly need to obtain from our tree population.

### 2.2 The valuation of trees

Over the past decades a number of systems to enable the value of trees to be estimated have been created. The Helliwell method, initially developed in 1967, is the oldest of the three best known systems reviewed. Revised periodically, the most recent version was released in 2008. Its main goal is to aid practical planning and management (e.g. felling, pruning and planting) of woodlands and urban trees by evaluating their relative contribution to the visual quality of the landscape. The Helliwell system puts an emphasis on visual amenity and also produces the most variable valuation outcomes.

The CAVAT system was developed in London and is targeted at local authorities and primarily publicly owned trees, providing a method for managing trees as public assets rather than liabilities. CAVAT tries to encompass the social/cultural component of the value of street trees.

The i-Tree Eco method was developed by the United States Forest Service which recommends its use by communities of all sizes to strengthen their urban and community forest management efforts.

It has been widely used in US cities, and an opportunity for Edinburgh to have its tree population valued by this method arose as part of a trial

project carried out in partnership with Forestry Commission Scotland and Forest Research. i-Tree allows “Ecosystem Services” (the functions performed by trees, such as carbon storage, trapping atmospheric pollutants etc) to be valued in monetary terms as well as the “Structural Value” of the trees themselves.

## 2.3 i-Tree Eco Valuation

This summary provides an overview of the results from a study which was undertaken using the i-Tree Eco model to estimate some of the major environmental benefits delivered by Edinburgh’s trees. The i-Tree Eco model was developed by the US Forest Service to quantify a selection of ecosystem services at the town and city scale. It has been used successfully in towns and cities in over 60 countries throughout the world, but the Edinburgh project is the first known use of the system in Scotland. Where possible, Scottish and UK methods were used to quantify the ecosystem value of the tree population, and to assess the risks of existing and emerging tree pests and diseases.

Forest Research conducted a survey of 200 field plots located across Edinburgh in the summer of 2011. All trees which had a diameter above 7 cm (at 130 cm above ground level) were recorded within these plots. Data was collected for each tree and shrub, including a record of species, stem height and diameter, canopy structure and canopy condition. The data was then analysed using the i-Tree Eco model.

i-Tree uses these data to model the biomass and leaf area of each tree. The resulting data is then modelled to estimate the amount of carbon stored and that sequestered each year by each tree, as well as the amount of gaseous and particulate air pollutants removed by a tree. The distribution of species observed in the plots which were surveyed is assumed to be representative of Edinburgh’s tree population as a whole. This assumption allows the model to derive the cumulative benefits that the whole tree population of Edinburgh provides, and can be further interpreted to the species specific level.

The results of the study suggest the urban forest of Edinburgh is made up of 638,000 trees, which provide a tree canopy cover of 17.0% of the total land area. The overall tree density in Edinburgh was estimated at 55.6 trees per hectare, which is slightly below the UK average of 58.4 trees per hectare. The structural value of Edinburgh’s tree population is valued at £382 million.

It was estimated that 53% of Edinburgh’s trees were native to Scotland. The ten most common tree species made up over 65% of the total population, and consisted of sycamore (12.1%), holly (11.1%), silver birch (7.6%), Leyland cypress (6.2%), ash (5.6%), beech (5.3%), rowan (4.7%), Scots pine (4.5%), Wych elm (4.5%) and cherry (3.7%). The high figure for holly is somewhat surprising, but it should be noted that it is present as a large shrub in the understorey of many woodlands even if it more rarely becomes a tree of any great stature.

iTree also calculates an Importance Value for each species, which gives an indication of the relative contribution to ecosystem services that each tree species population provides. Certain species have characteristics (e.g. their leaf area) which mean that they provide a relatively higher ecosystem service than other species. For example, cherry species make up only 3.7% of Edinburgh’s tree population yet contribute over 12.3% of the total leaf area of Edinburgh’s trees. Based on this assessment, the relative importance of the top-ten most prolific tree species in Edinburgh is sycamore, holly, cherry, silver birch, beech, ash, Leyland cypress, Wych elm, Scots pine and rowan respectively.

Surveyors also noted the condition of each tree assessed. Overall, 71% of Edinburgh’s trees were assessed as being in an ‘excellent’ condition, with 24% in either ‘good’ or ‘fair’ condition, and 15% being in ‘critical’, ‘dying’ or ‘dead’ condition.

Climate change is an issue of global concern. Urban trees can help mitigate climate change by binding up carbon in above-ground and below-ground parts of woody vegetation (carbon storage), and removing CO<sub>2</sub> from the air through photosynthesis (carbon sequestration).

Currently, Edinburgh's trees are estimated to store 145,611 metric tonnes of carbon within their tissues, at around 12.7 tonnes per hectare, and are estimated to sequester 5,329 metric tonnes of gross carbon per year. However, caution should be taken when using the carbon sequestration data for predicting future value, as i-Tree only provides a single estimation of net incremental value. However, the i-Tree estimate of sequestered carbon gives a useful indication to assess how the value of the carbon changes with time.

Of the species sampled, sycamore is estimated to store and sequester the most carbon (approximately 33.9% of the total carbon stored and 22.5% of all sequestered carbon). Other species in the top 10 overall for carbon sequestration are birch, beech, holly, cherry, poplar, rowan, ash, Leyland cypress and oak.

Under the 'low' scenario the trees of Edinburgh were estimated to store carbon with a non-traded value of £14.9 million in 2011 and were providing £484,689 per annum of non-traded value through net carbon sequestration. Using the same scenario ('low') the total value of carbon stored in Edinburgh's trees would accrue to £35 million by 2050. Values based on the 'central' scenario are twice that of the low, whilst those under a 'high' scenario are three times that of the 'low'. The carbon stored in the trees of Edinburgh is equivalent to the annual emissions of 20,801 people.

Figures can also be compared to carbon emissions from cars expressed as average passenger car emissions of CO<sub>2</sub> per kilometre travelled. The average car in Scotland emits an equivalent of 128g of CO<sub>2</sub> per passenger per kilometre travelled. The total stored carbon in trees, expressed as distance travelled, is equivalent to almost 4.2 billion passenger kilometres by car, whilst the net carbon sequestered annually by Edinburgh's trees is equivalent to 135 million passenger kilometres by car.

The i-Tree Eco model estimated that Edinburgh's trees remove a total of 100 metric tonnes per year of ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen

dioxide (NO<sub>2</sub>), particulate matter of less than 10 microns (PM<sub>10</sub>) and sulphur dioxide (SO<sub>2</sub>). This represents an estimated value in 2011 of more than £2.3 million.

**The full report "Estimating the Ecosystem Services Value of Edinburgh's Trees" is available here:**

[http://www.forestry.gov.uk/pdf/Edinburghi-treereport.pdf/\\$FILE/Edinburghi-treereport.pdf](http://www.forestry.gov.uk/pdf/Edinburghi-treereport.pdf/$FILE/Edinburghi-treereport.pdf)

## 2.4 Tree diseases and pests

Most people will be aware of the arrival in the UK of Chalara, a potentially disastrous disease affecting ash trees, which was first detected in 2012. The immediate future for Chalara and ash is simply not known at this stage, and Edinburgh will follow best advice in dealing with the threat.

Dutch elm disease, which arrived in Edinburgh in 1976, continues to be the most significant disease, with around 1000 trees infected and felled every year in the city. Edinburgh continues to rely on elms planted in Victorian times for a significant amount of its tree cover, and many of the larger and more valuable trees are therefore vulnerable to the disease. Whereas many cities abandoned disease control many years ago, Edinburgh's disease control campaign, running continuously since 1976, has limited the losses and ensured a greatly longer life for most elms.

Phytophthora lateralis affects Lawson's cypress (and its many cultivars) and has already been confirmed at a number of sites in the west of Scotland. It could yet become a significant cause of death in urban populations of this species as its distribution and prevalence is not yet fully known.

Currently the main threat to our native oaks in the UK is from Acute Oak Decline. In southern Britain the oak processionary moth has also become a serious issue due to its potential impact on public health (caused by its highly irritant hairs). Neither have yet been found in Scotland.

Horse Chestnut is affected by Bleeding Canker (caused by *Pseudomonas syringae* pv. *aesculi*) and Horse Chestnut Leaf Miner, both of which have been highly significant in southern parts of the UK, but only Bleeding Canker is currently a significant issue in Scotland, where 50% of urban horse chestnut trees were found to have been infected in 2007. There is no known cure.

Other insect pests, such as Emerald Ash Borer, Asian Longhorned Beetle and the Citrus Longhorned Beetle have not so far taken a hold in the UK, but in mainland Europe and North America these have caused the death of trees on a massive scale, which has had a significant economic impact. An outbreak of Asian Longhorned Beetle occurred in 2012 in southern England, and control measures designed to eradicate it were immediately put in place and are thought to have been successful.



## 3.0 Strategic context

### 3.1 Urban Forestry Strategy 1991

An Urban Forestry Strategy (UFS) was approved by the City of Edinburgh District Council in 1991. This provided guidance on the development and management of trees and woodlands in the city. The rationale behind many of the actions was different from now, both economically and environmentally. The 1991 UFS was the first cohesive attempt to survey and establish the extent and nature of the city's tree resource. Having established that the tree population was of relatively poor quality insofar as it was even aged and elderly, the objectives that followed were designed to improve the situation. There were also a series of wider objectives, covering education and community involvement.

The 1991 UFS had some notable successes:

- The creation of over 100 hectares of new community woodlands under the Millennium Woodlands initiative. Most of these woodlands are small and located in school grounds, parks and near to where people live and work. Most of these woodlands have survived and are now establishing as valuable environmental components. The largest of these woodlands was planted in Craigmillar Castle Park, which has gone on to become a Green Flag Award park.
- Stimulated by the UFS, a woodland adoption policy was progressed by the District Council, which led to many privately owned woodlands becoming Council-owned. The benefits were that neglected woodlands were brought into management, public access could be encouraged, and they could be protected. A good example of this is Moredun Woods off Gilmerton Road, which was gifted to the Council under this policy, and is now a part of the Burdiehouse Burn Local Nature Reserve, another Green Flag Award park.
- Supported by external funding, a Tree Warden Scheme was set up, leading to identification of Heritage Trees and community planting

schemes. Although no longer operating, the Tree Warden scheme could usefully be re-energised.

- Establishment of the Forest School Education Initiative and the Forest School Project Officer. The pilot initiative ended successfully in 2011 when Children and Families adopted the Forest Schools project into their outdoor learning programme.
- The Tree Protection Charter was created, which is still in force (see below for details).

### 3.2 Edinburgh & Lothians Forest and Woodland Strategy 2012-2017

The publication of the Scottish Forestry Strategy in 2006 marked an important shift in the emphasis of forestry policy. Focusing on delivering sustainable development and conveying a range of social, economic and environmental benefits, the strategy sets an ambitious target of expanding national woodland cover from 17% to 25% by the second half of the century.

Following this, an Edinburgh and Lothians Forestry and Woodland Strategy (ELFWS) was created to help deliver the vision of the Scottish Forestry Strategy at regional level and allow the Lothian local authorities to produce locally-focused action plans.

The Scottish Forestry Strategy set the context for a number of policy documents and initiatives which expand upon the role of woodland and forestry in meeting a broad range of objectives. Scottish Government has produced an advice document 'The Right Tree in the Right Place - Planning for Forestry and Woodlands' which provides the detailed framework for the development of local strategies and action plans.

Trees and woodlands have significant interactions with the planning system. Scottish Planning Policy includes a presumption in favour of protecting existing trees and woodland resources, and acknowledges the

suite of benefits that they convey to people and the environment alike.

The National Planning Framework (NPF2) sets the spatial strategy for Scotland's development to 2030, and designates national developments of strategic importance to Scotland. As a national development, the Central Scotland Green Network (CSGN) represents a major opportunity to build high quality, multi-objective woodland management and expansion into the region's planning policy framework - as NPF must be taken into account in the relevant Strategic and Local Development Plans.

The ELFWS is designed to ensure that woodland expansion and management contributes to the CSGN by making the links between its high-level objectives, the Scotland Rural Development Programme (SRDP), and other funding opportunities and appropriate activities 'on the ground.' The Strategic Development Plan for Edinburgh and Southeast Scotland (SESPan) clearly promotes 'increasing woodland planting to increase competitiveness, enhance biodiversity and create more attractive, healthy places to live' and includes explicit policy protection for trees and woodland. The plan includes a policy supporting the CSGN and highlights the role of Forestry and Woodland Strategies in contributing to delivery.

The Forestry Commission Scotland (FCS) 'Woods In and Around Towns' (WIAT) programme provides the focus for FCS work on improving quality of life in towns and cities. It creates major opportunities to bring neglected woodlands in urban areas into positive management, improving local environments, contributing to sustainable development and supporting people in using and enjoying their woods.

The ELFWS actions which relate to the City of Edinburgh Council Area are highlighted in the extracts below:

### **Existing woodlands**

The City of Edinburgh is fortunate in possessing significant networks of established woodlands – much of which is high quality and makes a

substantial contribution to biodiversity and townscape character. 40% is described as being ancient or long established.

Designed landscapes, wooded hills and the Water of Leith corridor are important features of Edinburgh's woodlands, along with parks, gardens, and street trees.

Managing these assets to secure public safety, safeguard character and contribute to the implementation of green network objectives will be the priority. However, this poses significant challenges for the local authority and private owners as the effects of climate change take hold, increasing uncertainty as to the impact of severe weather events, invasive pests and pathogens. Where assets are under-managed, sourcing material for biomass could provide a financial incentive to improve management regimes and deliver enhancement.

### **Sensitivities**

The ELFWS designates a significant proportion of central Edinburgh within the 'sensitive' category due to the presence of multiple designations, including the Old and New Towns World Heritage Site, Conservation Areas and Inventory-listed gardens and designed landscapes.

While there is little potential for significant expansion within these sensitive areas, there will be opportunities to reinforce key assets and succession planning for feature trees.

Ancient and long-established woodlands are also included in this category, such as those lining the Water of Leith and the Almond. These woods provide important habitat linkages through the heart of the urban area, and woodland creation and enhancement in the vicinity could add significant value to connectivity.

### **Opportunities: Preferred**

There is a relatively small area of 'preferred' land within the urban area, largely composed of vacant and derelict land. Although many of these

sites may find alternative uses, an innovative – and potentially short to medium term approach – could be to plant short-rotation coppice or short-rotation forestry as biomass crops. Where ground conditions allow, these have the potential to provide an income stream for the land owner, as well as supporting the development of the wood fuel sector in the region – and contributing to Green Network objectives. This is a significant opportunity for forestry to contribute to regeneration and environmental improvement. It is also a development which enjoys strong support from the third sector and is being actively explored by local authorities in other metropolitan areas.

### **Opportunities: Potential**

The majority of ‘potential’ areas are urban greenspaces where there may be a range of opportunities for appropriate planting to reinforce existing woodland networks, enhance character and, where management is an issue, a lower cost option than amenity grassland. Expanding urban woodland cover will also be an important component of delivering the Central Scotland Green Network, improving climate resilience and enhancing habitat networks. It is likely that expansion will be relatively limited as there may be competing management objectives and potentially local opposition to a perceived loss of open space. Local Authority open space / greenspace audits and strategies will be key in identifying potential for more woodland expansion in urban areas, albeit at a smaller scale.

Development proposals could also contribute to woodland expansion and creation of green networks where planting can be delivered in parallel with regeneration projects. Where development results in a loss of woodland, compensatory planting – as required by the Scottish Government Policy on the Control of Woodland Removal – should be directed towards preferred and potential areas in the vicinity.

**Table 1** shows an extract of the aims, objectives and actions extracted from the ELFWS. These are the strands that are relevant to the Edinburgh Council Area. There are 20 workstreams contained within the 5 year priority column, which are designed to deliver the objectives set out in the ELFWS. These 20 priority areas have been carried forward to the Council’s own draft Trees & Woodlands Action Plan, which is section 5 of this document.

**Table 1: Relevant Aims, Objectives and Actions extracted from the 2012 Edinburgh & Lothian's Forestry & Woodlands Strategy (ELFWS)**

Aim	Objective	Ref	5 Year priorities	Action by	Carried forward to the CEC tree & woodlands action plan
Expanding the region's woodland resource	Softwood forests Energy forests Mixed woodland Native woodland	EX 1-5	EX 1 Support the delivery of at least 180–250ha of new woodland across the region each year in line with the guidance provided in this Strategy	CEC Planning – planning conditions	Yes - need to define target for woodland creation in CEC authority area.
				CEC P&G	Yes - need to define target for woodland creation on CEC land, by 2017.
Building a strong, sustainable economy	Supporting tourism	EC 21-24	EC 24 Develop and publicise opportunities for active outdoor recreation in woodlands and forests, including mountain-biking, walking and activities such as orienteering.	CEC	Yes
Promoting a high quality environment	Enhancing biodiversity and delivering green networks	ENV 1-4	ENV1 Promote the establishment of new native woodlands as part of integrated habitat networks.	Primarily FCS through grant aiding, CEC Planning and CEC P&G.	CEC Planning policies and guidance - Monitor through measuring net gain as EX4.
			ENV2 Where there are suitable opportunities, enhance ancient and semi-natural woodland.	LFGNP; FCS; CEC LBAP & EBP; Planning system - planning conditions	Yes - need to define target date to bring all CEC owned A&SNW under appropriate management. Yes Protect and seek enhancement of A&SNW through planning policies.
	Protecting and enhancing the water environment	ENV 5-9	ENV4 Increase the proportion of existing woodland brought into positive management.	CEC P&G CEC EBAP/EBP	Yes - need to set target for CEC estate.
			ENV6 Promote woodland management and creation as a key component of sustainable flood management initiatives	CEC Planning CEC Planning & P&G	CEC Planning – link to SUDS schemes and catchment flood schemes. CEC Bridges & Structures team. CEC P&G for flood proposals on CEC land
			ENV7 Identify locations where new planting or woodland management can help increase slope stability.	CEC	Yes - but need to define relevance to CEC land?

Aim	Objective	Ref	5 Year priorities	Action by	Carried forward to the CEC tree & woodlands action plan
	Enhancing air quality	ENV 10	ENV10 Where appropriate, prioritise planting of street trees in urban AQMAs, and woodland expansion along strategic road corridors and adjacent to industrial estates	CEC P&G CEC P&BS	Yes CEC street trees target set CEC Planning – through policy and consents Yes - Monitor number of street trees; woodland creation.
	Protecting and enhancing character	ENV 13-17	ENV17 Promote the importance of managing and increasing trees and woodlands in urban areas to conserve and enhance townscape character	CEC Planning CEC P&G	CEC Planning – achieve through use of policy and guidance, espec Design Guidance and Conservation Area Character Appraisals.  Yes
	Protecting and enhancing the historic environment	ENV 18-19	ENV18 Promote positive management of historic gardens and designed landscapes and heritage trees to maintain their historic and cultural significance and increase resilience to climate change.	CEC Planning CEC P&G	Yes - CEC P&G deliver on CEC land. CEC Planning through guidance & policy.
			ENV19 Encourage forest restructuring to improve the setting of historic sites and landscapes.	CEC Planning CEC P&G (on own sites)	As above

Aim	Objective	Ref	5 Year priorities	Action by	Carried forward to the CEC tree & woodlands action plan
Securing resilience to climate change	Mitigating impacts on the climate	CC 1-3	CC 1 Expand woodland cover within Edinburgh and the Lothians as a means of increasing carbon sequestration and reducing net carbon emissions, following the guidance provided in Sections 3 and 5 of the ELFWS.	CEC Planning CEC P&G	As EX1
	Adapting to the effects of climate change	CC 4-7	CC 6 Promote positive and proactive management of key tree species and woodlands improve their resilience to climate change.	CEC EBAP	CEC Climate Change Adaptation Framework
			CC 7 Identify important individual historic trees and species that are vulnerable and begin succession planning to maintain contribution to character and significance.	CEC P&G	Yes - CEC P&G on CEC
Enhancing quality of life	Improving woodlands' contribution to wellbeing	QL 1-5	QL 1 Ensure that existing and new forests and woodlands are managed to create new opportunities for active travel, including walking, cycling and horse riding connecting settlements and the countryside.	CEC Planning CEC P&G	CEC Planning – implement Green Networks policy Yes
			QL 3 Promote the role of woodlands in providing a resource for physical activity, accessible to all parts of society close to where people live and work.	CEC P&G	Yes
	Improving community involvement and participation	QL 6-8	QL 6 Support community involvement in woodland projects, especially through mentoring and co-ordinating	CEC P&G	Yes – Tree Warden initiative and Parks Friends Groups.

### 3.3 Trees and woodlands on private land and in relation to development

#### Overview

Trees and woodland make an enormous contribution to the unique urban landscape of Edinburgh and play a major role in the international importance of its setting. In addition, trees and woodlands provide a wide range of environmental, social and economic benefits. In response to this, the Council aims to protect and enhance trees and woodlands through a range of statutory and policy measures. These measures relate to trees on private and public land, and trees which are affected by development.

The links below lead to the key planning documents and policies that concern trees. This document does not set out to create or review planning or development control policies, which have their legislative basis in planning acts and are subject to a separate consultation and approval process. Further information can be found in Appendix 1 and full details on these policy areas can be found by following these links:

#### Edinburgh City Local Plan:

[http://www.edinburgh.gov.uk/info/178/local\\_and\\_strategic\\_development\\_plans/1005/edinburgh\\_city\\_local\\_plan](http://www.edinburgh.gov.uk/info/178/local_and_strategic_development_plans/1005/edinburgh_city_local_plan)

#### Rural West Edinburgh Local Plan:

[http://www.edinburgh.gov.uk/info/178/local\\_and\\_strategic\\_development\\_plans/988/rural\\_west\\_edinburgh\\_local\\_plan](http://www.edinburgh.gov.uk/info/178/local_and_strategic_development_plans/988/rural_west_edinburgh_local_plan)

#### The Scottish Planning Policy (see paragraphs 146 to 148):

<http://www.scotland.gov.uk/Publications/2010/02/03132605/0>

#### Tree Protection Charter:

[https://www.edinburgh.gov.uk/downloads/file/8550/revised\\_tree\\_protection\\_charter\\_committee\\_report](https://www.edinburgh.gov.uk/downloads/file/8550/revised_tree_protection_charter_committee_report)

#### Tree protection in relation to development – design guide:

[http://www.edinburgh.gov.uk/download/downloads/id/1048/tree\\_protection](http://www.edinburgh.gov.uk/download/downloads/id/1048/tree_protection)

#### Tree Preservation Orders: (see appendix 1 of the report):

[http://www.edinburgh.gov.uk/downloads/file/8550/revised\\_tree\\_protection\\_charter\\_committee\\_report](http://www.edinburgh.gov.uk/downloads/file/8550/revised_tree_protection_charter_committee_report)

#### Trees in Conservation Areas:

[http://www.edinburgh.gov.uk/info/194/conservation\\_areas/692/conservation\\_areas](http://www.edinburgh.gov.uk/info/194/conservation_areas/692/conservation_areas)

#### Woodland Habitat Action Plan:

[http://www.edinburgh.gov.uk/downloads/file/3020/woodland\\_habitat\\_action\\_plan](http://www.edinburgh.gov.uk/downloads/file/3020/woodland_habitat_action_plan)

### Central Scotland Green Network

The Council is a partner in the delivery of the **Central Scotland Green Network**. This is a national development which aims to transform Scotland into a place where “the environment adds value to the economy and where people’s lives are enriched by its quality”. The CSGN will connect green and blue spaces in our towns and cities with the wider countryside and coast. Trees and woodlands are an essential part of this network. Opportunities to strengthen the woodland habitat network will be sought, through development gain and other mechanisms, such as woodland creation grant-aided by the Forestry Commission.

## Section 4: Draft Tree Management Policies

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## 1. Introduction

This section sets out the Council's policies with respect to the management of its trees and woodlands. Edinburgh's residents, visitors and businesses benefit from the many economic, social and environmental functions and values that the city's trees and woodlands provide. It is therefore in the interests of all that trees and woodlands are managed to the highest standard to maximise their benefits, and minimise the risks and difficulties that they may present to the public.

This policy document is intended to cover the majority of tree-related concerns, and to provide guidance on how the Council will deal with these in relation to its own land holding. Whilst there are 41 draft policies, there may still be eventualities arising not covered by a policy. The Council does not have unlimited resources to respond to tree problems and work requests, and therefore has to prioritise which works are most important. The policies are intended to make the decision-making process around tree work more transparent.

## 2. Aims of Tree Policies

- To set out how the Council will manage, protect and enhance its tree stock;
- To set out the criteria for decisions taken by the City of Edinburgh Council in respect of the management of trees and woodlands, and how work will be prioritised;
- To set out how the Council intends to fulfil its duty of care in respect of public liability;
- To promote positive management of Edinburgh's trees through adoption of good practice;
- To highlight tree protection legislation in the form of Tree Preservation Orders & Conservation Areas;
- To support Edinburgh's Biodiversity Action Plan where appropriate.

## 3. Legal Obligations

The Council has a duty of care to maintain its trees in a safe condition where that is "reasonably practicable". Proactive management ensures that it is able to meet its Health & Safety liability relating to public trees, allowing people to safely enjoy the amenity, conservation and health benefits that Edinburgh's trees provide.

Duty of care is defined by several different Acts, including the Occupiers Liability (Scotland) Act 1960 and the Health & Safety at Work Act etc 1974, section 3 (1); Land Reform (Scotland) Act 2003; Roads (Scotland) Act 1984; Town and Country Planning (Scotland) Act 1997; Wildlife & Countryside Act 1981; and Nature Conservation (Scotland) Act 2004. The management of trees is informed by Health & Safety Executive guidance "Management of Risk from Falling Trees" (SIM 01/2007/05) 2007.

The above legislation, together with established case law, means that the City of Edinburgh Council must:-

- Survey its trees
- Have this done by a competent person
- Take reasonable action to ensure that they are reasonably safe
- Create individual tree reports, recording potentially serious structural faults posing a potentially serious risk to public safety, and show where a tree is to be retained.

The Council manages its own trees via the City of Edinburgh Council Forestry Service (within Parks & Greenspace), which utilises a specialised tree management database called Ezytreev. This allows the Council to keep accurate records of all the city's trees under active management and allows it to prioritise and programme tree work.

## 4. Contact Information

### Trees on Council land

For enquiries regarding trees or woodlands in parks, streets, gardens, woodlands, cemeteries and walkway/cycleways, you should contact the Forestry Service.

### Services for Communities - Forestry

Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
Tel: 0131 311 7074 Email: [forestry.service@edinburgh.gov.uk](mailto:forestry.service@edinburgh.gov.uk)

For enquiries regarding Trees in Council House Gardens you should contact your Neighbourhood Office Housing Officer – 0131 200 2000

For enquiries regarding trees in schools, **Children & Families centres / Health & Social Care** properties, you should contact Integrated Property Facilities Management – contact details

For **out-of-hour emergencies** 0131 200 2000.

### Trees on Private land

If you have an enquiry relating to trees and woodlands on private land you should contact the Arboricultural Officers in the Planning Service.

### Services for Communities - Planning

Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG  
Tel: 0131 200 2000

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)

## Finding out why works are being or have been done

Clarification of why a tree is to be or was pruned/felled can be obtained by contacting the Forestry Service, which will endeavour to provide this information on demand, but failing that within 10 working days of receipt of the enquiry. (See Policy 9)

## 5. Common Law Right

### 5.1 General householder rights and responsibilities

Householders have a Common Law right to remove (abate) the nuisance associated with trees encroaching onto their property. The following advice is given in relation to the exercise of Common Law rights with respect to encroaching trees:

- You can only consider removing those parts of the tree from where they cross the boundary of your property. You have no legal right to cut or remove any part of a tree that does not overhang or is beneath your property (i.e. the roots);
- You must not carry out any tree works on branches or roots that foreseeably may result in the tree becoming unsafe or results in the decline or death of the tree. It is advised that you seek appropriate competent advice before carrying out any pruning, especially when severing tree roots.
- You do not necessarily have the right to enter on to land not belonging to you in order to carry out the removal of branches etc. You do have the right to carry out these works from your own land.
- For your own safety you are strongly advised to consult a professional tree surgeon for guidance on how best to prune back encroaching trees, unless the works are very minor, meaning you could do the works with hand secateurs, loppers or similar.

- Before you consider doing any works to a tree/trees you should find out if they are protected by a Tree Preservation Order or are within a Conservation Area. If the trees are protected you will need to gain consent by making an application/giving notice to the Council. To find out if the trees are protected and guidance on how to apply for works if they are protected see contacts section.
- You are advised to discuss with your neighbour your intention to prune encroaching branches. Legally you do not own the encroaching branches and you should offer these to your neighbour. But in all likelihood, you should consider disposing of the arisings yourself. If the encroachment relates to a council owned tree, any cuttings must be disposed of appropriately and not returned to Council land.

## 5.2 Trees & Subsidence in Edinburgh

The subsidence of buildings in Edinburgh due to the presence of tree roots is very uncommon. Trees cause subsidence in some other parts of the UK when, in dry periods, the roots extract water from within the structure of shrinkable clay soil. It is the subsequent contraction of the clay which causes the settlement of buildings in these cases. Edinburgh has only very small localised pockets of this type of soil and due to typical weather conditions it is unlikely that trees will be associated with subsidence in the city.

If you have any concerns in relation to trees and subsidence within Edinburgh it is advisable to obtain professional advice from a competent consultant. Ground investigation and soil analysis will normally be required to establish if a tree is contributing to building subsidence before any remedial action can be carried out.

## 5.3 Council powers in relation to privately owned trees

The main powers Council has in relation specifically to privately owned trees are:

- Power to create Tree Preservation Orders: Town and Country Planning (Scotland) Act 1997 (as amended); Town and Country Planning (TPO and Trees in Conservation Areas) (Scotland) Regulations 2011.

- Power to designate Conservation Areas: The Planning (Listed Building and Conservation Areas) (Scotland) Act 1997.
- Power to enforce necessary works to trees in relation to roads and footpaths. The Roads (Scotland) Act 1984.
- Power to control the spread of Dutch elm disease: Dutch Elm Disease (Local Authorities) Order 1984, as amended 1988. The Council position on use of these powers is set out in the report "Dutch elm disease – legislative review", Council Executive 8 November 2005.

These powers are limited. The Council does not have the power to compel a private owner to remove a dangerous tree unless it threatens a public road or footpath, nor does it have powers to compel owners to carry out tree work on the basis of light deprivation, encroachment or damage to property. These are matters that need to be resolved through negotiation or, failing that, by resort to civil legal action.

## 6. Tree management and Policies

### 6.1 General approach to tree management

The approach to managing the Council's tree stock is based on good management practice, and in particular on the guidance produced for the owners and managers of trees by the Health & Safety Executive. Good management practice is not set out in any one text, but the Council will be guided in its approach to achieving the right balance between safety and the conservation of amenity by the document "Common sense risk management of trees", produced in 2012 by the National Tree Safety Group and endorsed by many bodies, including the Health & Safety Executive.

Trees are inspected periodically to check their condition and identify any works to make them reasonably safe, which may include pruning or, if required, removal of the whole tree. Following a tree survey, and where appropriate, trees in council ownership may be tagged with a

coloured plastic numbered tree tag to help identify the tree for future tree inspections or when responding to tree related enquiries. Visual tree inspections carried out on a 5 year cycle, or sooner if required, may suggest more detailed inspections or more regular monitoring of individual trees.

**Policy 1: Trees in council ownership will be inspected for safety, on a cycle between one and five years according to size, targets, condition and survey recommendation for each tree. This information will be recorded on the Council's data base.**

It is of key importance that staff carrying out tree inspections are appropriately qualified and experienced. This is one of the key issues to emerge from recent case law involving public liability.

**Policy 2: Tree inspections will only be undertaken by people who are qualified, experienced and competent to undertake the Visual Tree Assessment (VTA) method of survey.**

The process of gathering the necessary data on each tree to allow informed management decisions to be made is resource intensive and is therefore a gradual one, in which the trees presenting the probable greatest hazard (i.e. streets etc) are surveyed first. Whilst the Council's database was set up in 2008 and is now extensive, it is not a complete record of all trees, and further efforts are required to ensure that the whole tree population is recorded.

**Policy 3: The City of Edinburgh Council will take steps to bring all of its trees under active, appropriate and informed management.**

## **6.2 Prioritisation of tree works**

As set out above, the Council has a legal and moral duty to ensure that the public can go about their daily business with a reasonable expectation of safety in relation to trees. The Council has a limited amount of resources to carry out tree works, so they have to be prioritised in a rational and defensible way. This means that safety works – addressing

trees that present a known safety risk – will always take priority. High priority works are typically those required on trees displaying defects that unless remedied could foreseeably fail, resulting in injury to the public or damage to property.

The ranking of priorities is inevitably an imperfect business as trees are living organisms and failure rates cannot be predicted with the same accuracy as engineering structures. The availability of appropriately qualified and experienced staff to make judgements is therefore key.

**Policy 4: The Council prioritises tree work according to the individual tree's health & safety risk, taking into account current available resources. Tree works will normally be completed in safety priority order.**

The Council may therefore simply not have the resources to carry out certain types of work. Details and examples of the types of complaints that are regarded as amenity or nuisance requests are provided in Section 4 part 8.0 Common Tree related issues.

It is recognised that members of the public may have a legitimate complaint regarding a tree in Council ownership, where works are required to alleviate the nuisance. An example of this is a tree standing on Council land which has grown to overhang a neighbouring garden. Currently the Council may well be unable to undertake the required works as resources are prioritised towards essential safety works as detailed above. However, in the circumstances previously detailed, a householder has Common Law rights to abate a nuisance caused by overhanging branches/roots.

**Policy 5: The Council accepts the right of householders to remove overhanging branches, (subject to compliance with Tree Preservation Orders and/or Conservation Area status) and where required will assist householders to identify a suitable arboricultural contractor who can carry out works to the appropriate standard.**

There are however cases in which Council-owned trees are causing a nuisance, for example by blocking light or views, but are not overhanging

the householder's property. Again, the Council may be unable to prioritise these works, leaving the householder currently with no remedy. In such cases the Council will consider agreeing to tree works to be carried out at the householder's expense, although each enquiry will have to be dealt with on its individual merits. If the works are agreed with a Trees and Woodlands Officer, an experienced arboricultural contractor will have to be appointed and a copy of their insurance certificate and qualifications provided to the Forestry Service before any work can be carried out. All tree works will have to be carried out to approved industry standards in accordance with BS 3998: 2010 'Tree work – Recommendations'.

**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, that the works will be agreed with the Council beforehand, that a suitable arboricultural contractor is appointed, and that each case will be considered on its individual merits.**

### **6.3 Response to tree enquiries**

The Council is endeavouring to adopt a proactive approach to tree management. Work planned in advance can be implemented more efficiently so, as far as possible, it is the intention to generate work programmes from the results of systematic survey work and routine inspection programmes.

The Council receives many enquiries relating to trees, the majority of which are perfectly legitimate, and which require an inspection to be made.

**Policy 7: For non-emergency tree-related safety issues a Trees & Woodlands Officer will aim to carry out a tree inspection within 10 working days of receipt of the enquiry and the customer notified thereafter within 5 working days of what action the Council intends to take.**

From time to time damage may be caused to private property by trees. In the event that an owner considers that their property has been damaged

by a Council tree (for example a fallen tree or branch) they should contact the Council. It is advisable that they contact their insurance provider for advice. In addition, if they wish to make a formal claim for damages or to formally notify the Council with concerns about future damage, it should be done in writing, supplying full details of the circumstances.

**Policy 8: Claims made in writing to the Council in relation to alleged damage caused by a Council owned tree will be acknowledged within 10 working days of receipt.**

An appropriate Council Officer will write a report on the condition of the tree relating to the claim. This may require a site visit. This report will be passed to the Council's Insurance section who will process the claim for damages.

### **6.4 About the work we do to trees and in woodlands**

The Council aims to carry out works to trees to the appropriate industry standards. In most cases the relevant standard is British Standard 3998: 2010 'Tree work - Recommendations'. Generally the Council's approach is only to carry out works where necessary, either for safety reasons, disease control, for the health of the tree/woodland or for amenity reasons. Occasionally trees may have to be removed to allow certain works to be carried out, such as road re-alignment or construction projects. Often these latter types of work are subject to Planning legislation, and there is an opportunity for public debate about proposals before they are approved.

Trees in Parks & Greenspace are managed to reflect the circumstances of the individual site and the type, age and condition of the current or historic trees. Trees in parks generally have more room to grow compared to street trees and typically achieve their full height and spread. Ongoing maintenance includes the removal of health & safety tree works and the removal of low branches from pathways only where they pose a risk to public safety.

Street trees in Edinburgh include a high number of large 'landscape' type trees growing in architecturally significant street spaces. Given this, street

trees need to be regularly monitored to keep them in a safe condition for residents and the public. Only trees that are deemed unsafe are removed/felled. It is the Council's intention to retain street trees in a safe condition as a public amenity. Replacing street trees is complicated by the nature of the tree locations. Many factors hinder the replacement of lost street trees such as underground utilities, space available for the tree to grow above or below ground and the increased costs associated with the establishment of street trees.

Woodlands require a slightly different approach to management, and are generally managed as a whole rather than as individual trees. In most woodlands the risk presented by defective trees is far less than if the tree was located next to a busy road, so the type of work done will reflect this. Thinning of young woodlands is often required to reduce density and to allow maturing trees room to grow. This involves the removal of a proportion of the trees and is a normal part of woodland management. If it is not done, trees within young woodland may become spindly and unstable, leading to the woodland becoming unviable in later years. Typically this would be carried out in woodland where the trees are between 10 and 30 years old.

Tree removal is regrettable but under a number of circumstances necessary. The decision to remove a tree is not taken lightly and, apart from when a dangerous tree needs urgent attention, we will endeavour to inform local residents when and why we believe that tree felling is necessary.

Trees may be pruned for a variety of reasons, including the removal of damaged, poorly formed or crossing branches, to reduce the likelihood of failure by taking 'weight' out of the tree and generally to keep a tree in a healthy safe condition.

**Policy 9: The Council will not carry out works to trees, or fell them, unless it is necessary to do so. When works are carried out, the reasons for the work will be documented and recorded.**

When trees are pruned or felled, arisings (i.e. logs, branches leaves etc)

need to be dealt with appropriately. How arisings are disposed of will vary from site to site and according to practical constraints. Generally, all arisings from tree work in parks, gardens, streets and cemeteries will be removed from site. Normally branchwood is chipped, which creates a by-product that can be used for mulching or surfacing paths, and timber may be removed from site and sold by auction. Sometimes timber may be stacked until it can be collected by a suitable vehicle.

In woodlands it may be appropriate to leave chipped material on site to compost naturally, and it may also be useful to leave logs on site to rot down thereby providing habitat. Where logs are left on site it is imperative that they are left reasonably safe so that they do not roll down slopes where they could cause injury or damage to property.

When safe to do so, dead trees will be left standing in woodlands, although branches may need to be removed. The Council will adopt the Woodland Trust's guideline of 20 cubic metres of deadwood per hectare of woodland wherever practicable to help support biodiversity.

The public is not permitted to remove wood (or other parts of a tree) from Council owned or managed land without prior consent from the Council. Unauthorised persons are not allowed to use a chainsaw of any type on Council owned or managed sites.

**Policy 10: Disposal of arisings: Where practicable, all arisings (logs, branches etc) from tree works in high amenity areas will be removed. In woodland situations however, standing dead wood, logs and chippings may often be left on site, where this can be done safely, to enhance biodiversity and increase wildlife habitats.**

In some areas, ivy growth on trees is common. Often it poses no risk in itself, and may provide a valuable wildlife habitat. However, in some circumstances it can threaten the stability of trees, either through an increased sail effect in high winds, or by increasing risk of failure because snow accumulates in it. This can be a hazard where there is public access or property. Ivy can be associated with woodlands that are in decline, and

although there are differing views on cause and effect, the control of ivy in declining woodlands can have a positive effect.

In severing or removing ivy, consideration must be given to the potential presence of bird nests and bat roosts. This factor alone should not negate ivy control but may delay the process until a full assessment has been carried out.

**Policy 11: Management of ivy and trees. The Council will control ivy on trees where it is having a significantly negative effect.**

### 6.5 Tree stumps

Normally when a tree is felled, a stump is left. It is usually not possible to remove the stump at the same time. Stumps in parks, gardens and streets may be unsightly and can be a trip hazard. They may take many years to decay naturally, and generally it is appropriate to remove them from parks, gardens and streets wherever practicable.

Stump removal requires the use of special equipment, usually a stump grinder, which reduces the above-ground parts of the stump into small chips. It is often possible to grind away the stump down to 300 – 450 mm below ground depending on the machine. This process is time-consuming and energy-intensive.

Removal of stumps from pavement and roadside locations can be difficult and complicated, there may be underground utilities present, and works may involve temporary road closures. For these reasons removal of stumps in pavements cannot always be achieved quickly.

In woodland sites it is usually appropriate to leave stumps to decay in situ.

Currently, the Council has a backlog of stumps that need to be removed and this is being dealt with on a prioritised basis as resources allow.

**Policy 12: The Council will seek to remove stumps promptly where practicable and appropriate. In woodland locations, stumps will generally be left to decay in situ.**

## 7. Day to day tree management issues

### 7.1 Roads - Sight line obstruction

Standards for visibility vary according to the class of the road and the speed limit in force. If a privately owned tree is causing an obstruction to the visibility at a road junction (sight line), powers exist under the Roads (Scotland) Act to make the owner of the tree remove the obstruction.

A site inspection will be undertaken within 10 working days of receipt of service request and the customer notified of what action is considered appropriate.

**Policy 13: the Council will undertake work to a tree in its ownership to maintain clear sight lines (where reasonably feasible) at junctions and access points (associated with a street, road or highway).**

### 7.2 Pavements - Trip hazard

In response to a reported tree trip hazard on a public pavement, a joint inspection will be carried out between a Tree and Woodlands Officer and Roads Officer to assess potential solutions.

If a privately owned tree is causing damage to the pavement leading to a trip-hazard, powers exist under the Roads (Scotland) Act to make the owner remove the obstruction. There are a number of ways the Council can repair a pavement damaged by tree roots. Simply, the pavement surface can be 'built-up', or isolated roots can be pruned (if these do not affect the stability of the tree) and the pavement surface repaired. In some circumstances it may be appropriate to consider the installation of a root barrier which can prevent problems re-occurring. Removal of the tree is usually the last resort (accepting that in some circumstances where the tree is low value or can be replaced, removal may be the most appropriate solution).

**Policy 14: The Council will undertake measures to make safe an unacceptable trip hazard in streets, roads or the public highway caused by the growth of a council owned tree.**

### **7.3 Trees obstructing an adopted road**

Where trees and large shrubs are interfering with the passage of vehicles or pedestrians along an adopted road or footway the owner of the tree is responsible for their maintenance. The Council has the power under the Roads (Scotland) Act to order a landowner to carry out such clearance, and in some instances will carry out pruning work itself, reclaiming incurred costs from the owner of the tree in question.

**Policy 15: The Council will undertake measures to make safe any unacceptable carriageway obstruction due to trees in streets, affecting roads or the public highway caused by the growth of a council owned trees.**

A Trees and Woodlands Officer will carry out a site inspection and if required will create a work order to maintain the 5.5m minimum height clearance. If a privately owned tree is causing an obstruction to a road, powers exist under the Roads (Scotland) Act to make the owner of the tree remove the obstruction.

**Policy 16: The Council will undertake work to a tree in Council ownership to maintain a minimum 5.5 metres height clearance over the carriageway - where reasonably feasible.**

### **7.4 Danger to public highway (private tree)**

If a tree in private ownership is shown to be a danger to the public highway it will be identified for work to make it reasonably safe. The landowner will be contacted and instructed to make the tree safe under the Roads (Scotland) Act. If it is necessary that the Council undertake this work then the owner will be charged in full for the Council's costs.

**Policy 17: The Council will undertake measures to make safe any unacceptable carriageway risk due to private trees in a dangerous condition, within falling distance of roads, or the public highway.**

### **7.5 Pavement – obstruction by tree**

Any works necessary to prevent an obstruction in the width of a footpath associated with the highway due to the presence of a Council owned tree would be considered on a case-by-case basis. If a privately owned tree is causing an obstruction to a footpath associated with the highway, powers exist under the Roads (Scotland) Act to make the owner of the tree remove the obstruction.

**Policy 18: The Council will undertake work to a council owned tree to maintain a minimum (where reasonably feasible) 2.5 metres height clearance over a footpath associated with a street, road or highway (3 metres where there are cycling rights).**

### **7.6 Street light – obstruction by tree**

The Forestry Service will prune branches if they affect the zone of illumination. A Trees & Woodlands Officer will carry out a site visit and create a work order if appropriate. If a privately owned tree is causing an obstruction to a street light, powers exist under the Roads (Scotland) Act to make them remove the obstruction. If the owner does not, the Council will do the work and recharge the owner. When the Council puts in new street lighting or wishes to move a lighting column, consideration is made of the impact on existing trees. Similarly, when new trees are being planted, these are to be placed so they do not cause problems to existing streetlights.

**Policy 19: The Council will undertake work to a tree in its ownership to ensure that it does not unduly obstruct the streetlight zone of illumination.**



### **7.7 Protection of trees during construction.**

Trees in parks and streets and other areas may be in close proximity to sites for construction and development. Examples are the creation of footpaths, the installation of lighting in parks, or the erection of temporary structures. Trees may be affected by physical damage to branches and stems, the severing of structural or fine roots, or the compaction of soil, which reduces the amount of air and water available to the tree. It is of key importance that trees are protected. This policy simply brings the protection afforded the Council's own trees into line with the expectation placed on private owners in relation to development.

**Policy 20: The Council will ensure that all construction and development, including temporary installations and placement of movable equipment, near to trees follows BS:5837 (2012) "Trees in relation to design, demolition and construction - Recommendations" and that the most recent National Joint Utilities Group "Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees" are followed where carrying out works in root protection areas cannot be avoided.**

### **7.8 Traffic signal / street sign obstruction**

The Council will undertake work to a tree in its ownership to maintain clear sight lines (where reasonably feasible) for traffic signals and street signs (associated with a street, road or highway). If a privately owned tree is causing an obstruction to a traffic signal or street sign, powers exist under the Roads (Scotland) Act 1984 to make the owner remove the obstruction.

**Policy 21: The Council will undertake work to a tree in its ownership to ensure that trees do not unduly obstruct traffic signals or street signs.**

### **7.9 Crime and anti-social behaviour**

The Forestry Service may remove trees considered to be exacerbating crime and/or anti-social behaviour, but generally will remove only lower branches to allow sight lines through the trees so people cannot use

them for cover. Where a tree is associated with criminal activity and/or anti-social behaviour, steps to reduce the problem will typically require the coordination of a number of agencies, including the police. Just pruning or felling a tree is not always the answer to the problem. Some research shows that areas with lots of trees actually help to make places safer. But, neglected spaces with overgrown trees and untidy areas can encourage criminal activity and/or anti-social behaviour. The Council's tree and grounds maintenance programme seeks to improve these areas by making the local environment cleaner, greener and safer.

**Policy 22: Where a Council owned tree or woodland is associated with criminal activity and/or anti-social behaviour, measures to alleviate the problem will be implemented on a site-by-site basis in consultation with the Police, communities and neighbourhood teams.**

### **7.10 Vandalism**

The Council generally plants large trees that are more difficult to vandalise, including metal guarding, which is removed once the tree has become established, usually three years after planting. We actively promote tree planting and encourage local residents, including young people, to take part and care for the trees in their neighbourhood. These combined measures have reduced problems of vandalism to generally low levels.

**Policy 23: The Council will investigate reports of vandalism to a Council owned tree or woodland and try to correct any damage where appropriate and within available resources.**

## 8.0 Common Tree related issues

### 8.1 Tree too big / too tall

A tree is not dangerous just because it may be considered too big for its surroundings. Other problems would need to be identified for the Council to consider it to be dangerous. Generally, a site inspection will not be required. Customers will be informed of Council policy within 10 working days of receipt of an enquiry. Customers can receive an immediate response by searching for the relevant stated policy on the Council's web site.

**Policy 24: The Council will not prune or fell a Council owned tree simply because it is considered to be 'too big' or 'too tall'.**

### 8.2 Leaves

The Council does not carry out a public leaf collection service. Although complaints are sometimes received about the problems caused by leaves falling from trees, the loss of leaves from trees in the autumn is part of the natural cycle and cannot be avoided by pruning. The maintenance of rhones and/or gutters is the responsibility of the landowner and the Council is not obliged to remove leaves that may have fallen from Council owned trees. Where rhones/gutters are regularly blocked by fallen leaves gutter guards may be fitted to provide a low maintenance solution.

For roads, streets and parks the Council carries out a leaf collection in the autumn to clear fallen leaves from certain sites. In parks and green spaces, paths or areas of hard standing are regularly cleared of fallen leaves, but leaves on grass/shrub beds are generally left until the majority of leaves have fallen before they are removed (unless leaving them would damage the grass in which case the accumulated leaves would be removed sooner). Collected leaves are usually sent for composting.

**Policy 25: The Council will not prune or fell a Council owned tree to remove or reduce leaf fall or remove fallen leaves from private property.**

### 8.3 Light

In law there is no general right to light, and there is no right to light in connection with open land, such as a garden. Owners can exercise their Common Law right to remove (abate) the nuisance associated with encroaching trees, see section 5 - Common Law Right.

**Policy 26: The Council will generally not prune or remove trees in cases where they cause a reduced amount of light to fall on a property, other than in exceptional circumstances.**

### 8.4 Bird droppings

Bird droppings may be a nuisance, but the problem is not considered a sufficient reason to prune or remove a tree. Nesting birds are protected under the Wildlife and Countryside Act 1981 (and other related wildlife law). Warm soapy water will usually be sufficient to remove the bird droppings.

**Policy 27: The Council will not prune or fell a Council tree to remove or reduce bird droppings from trees, or remove bird droppings from private land.**

### 8.5 Fruit / berries / nuts

Fruit trees such as apple, cherry and pear have the double benefit of spring blossom and autumn fruit. This makes fruit trees good for wildlife and a source of free food. But, there are some locations where fruit trees are less desirable, for example where soft fruit would make the pavement slippery or where anti-social behaviour could encourage fruit being thrown at houses or cars. When considering what tree to plant the Council takes account of the likelihood of such problems. Equally, where fruit trees are established but where there is a significant anti-social behaviour problem the Council will consider phased removal and replacement.

**Policy 28: The Council will not prune or fell a Council owned tree to remove or reduce the nuisance of fruit/berries or nuts, or remove such fallen fruit from private land. However, where fallen fruit is leading to significant anti-social behaviour problems it will consider measures to reduce the problem, including whether a phased removal and replacement with alternative species is reasonable.**

### **8.6 Sap / Honeydew**

Honeydew is caused by greenfly (aphids) feeding on the tree, which excrete a sugary sap. Often the honeydew is colonised by a mould, which causes it to go black.

Unfortunately, there is little that can be done to remove the aphid which causes the problem and pruning the tree may only offer temporary relief. Any re-growth is often more likely to be colonised by greenfly thereby potentially increasing the problem. Some trees, such as limes, are more prone to attack by greenfly and in some years greenfly are more common, especially following a mild winter. Honeydew is a natural and seasonal problem. Where new trees are planted we try to choose trees that are less likely to cause this problem. Where honeydew affects cars, warm soapy water will remove the substance, particularly if you wash the car as soon as possible.

**Policy 29: The Council will not prune or fell a Council owned tree to remove or reduce honeydew or other sticky residue from trees.**

### **8.7 Pollen**

Whilst some kinds of tree pollen are known to bring on in sufferers the symptoms of hay fever this is not considered justification for either the pruning of Council trees, or their removal.

**Policy 30: The Council will not prune or fell a council owned tree to remove or reduce the release of pollen.**

### **8.8 Telephone wires**

It is the telephone service providers' responsibility to maintain your service. Several options are available to the utility company that do not require pruning of a tree to maintain your service. Often pruning is a temporary solution and the problem may reoccur when branches grow back.

For example the cable can be sheathed at points of high friction; the line can also be redirected through the tree canopy. It may be that your telephone service provider is able to suggest an alternative solution to the problem of trees affecting telephone wires.

**Policy 31: The Council will generally not prune or fell a Council owned tree to remove or reduce interference with telephone wires.**

### **8.9 TV / Satellite Reception**

It may be that a satellite or TV provider will be able to suggest an alternative solution to the problem, for example relocating the aerial/dish or means to boost the signal.

**Policy 32: The Council will generally not prune or fell a Council owned tree to prevent perceived interference with TV/satellite installation/reception.**

### **8.10 Wild animal / insect pest**

Bees, some animals, and many birds are protected species and advice should be taken before considering their removal. Advice on dealing with animal pests such as wasps can be obtained from the Council by calling 0131 608 1100.

**Policy 33: The Council will not prune or fell a Council owned tree to remove or reduce incidence of perceived pests such as bees, wasps, or wild animals.**

### **8.11 Drains & Invasive Roots**

Tree roots typically invade drains that are already broken or damaged. Trees themselves very rarely break or damage the drain in the first place. Tree roots found in a drain are usually symptomatic of an underlying problem requiring repair of the broken pipe.

Tree roots can cause damage to paving, lawns and drains and the foundations of buildings or walls. Again, where a neighbour's tree is causing problems, an owner is within their rights to cut back roots to the boundary of their property, unless it is protected by a TPO or is within a Conservation Area. However, it is always worth remembering that undermining the future stability of the tree can lead to future liability for any future damage caused.

**Policy 34: The Council will not prune, fell or cut the roots of a Council owned tree to prevent roots entering a drain that is already broken or damaged.**

### **8.12 Tree touching building**

In many cases the solution will be for the Council to prune the tree, but in exceptional circumstances it may be more appropriate to fell the tree. If pruning is appropriate we will endeavour to undertake works to stop the problem re-occurring within three years.

**Policy 35: In the event that a Council tree is causing damage to property, a Trees & Woodlands Officer will aim to respond within 10 working days and, if appropriate, remedial works will be undertaken.**

### **8.13 Tree overhanging property**

Householders have the right to prune overhanging branches back to their boundary as long as the pruning does not result in the demise of the tree. For any works on trees protected by Tree Preservation Orders (TPOs) or that stand within Conservation Areas, permission must be granted by the Arboricultural Officers within the Council's Planning service. All works should be carried out in accordance with BS3998: (2010) 'Tree work –

Recommendations'. It is advised that this work is carried out by a fully insured and experienced arborist. Tree works should also be undertaken outside of the bird nesting season, which typically falls between the months of March and September.

**Policy 36: The Council will generally not prune or fell a tree in Council ownership to alleviate the nuisance of overhanging branches.**

### **8.14 Tree obstructing view**

There is no legal right to a 'view'.and this issue is treated in much the same way as section 8.3 "Light".

**Policy 37: The Council will generally not prune or fell a Council owned tree to improve the view from a private property.**

## 9.0 Dangerous trees and tree-related emergencies

The Council operates an emergency call-out system in the event of dangerous trees, and a duty officer is on call 24 hours a day, 365 days a year. A stand-by squad of arborists is normally available should this be required, and the Council retains a number of private contractors who can stand by or attend in emergency situations.

If a Council owned tree is in such a condition that it poses a very high risk to people or property and is considered to be an emergency situation, instruction will be given to start the process of making the tree safe. An emergency is defined as a tree that is in immediate danger of collapse or a tree that is causing an obstruction requiring urgent attention. Emergency tree works are defined as the minimum amount of work that requires to be done in order to remove the immediate risk to life, limb and property.

The number of tree-related emergency incidents is usually small, but in severe weather events there may be a large number created in a very short space of time. For example the storm of January 3 2012 caused over 450 incidents which were reported as emergencies.

When the wind blows, trees move and may look as if they are going to fall over. Trees have evolved to move in the wind to limit breakage and the movement of stem and branches is not in itself a dangerous sign. It is however not possible to guarantee that any tree will not fail, as even the healthiest may succumb in the most extreme conditions.

Trees at the highest risk of complete failure are ones displaying movement at the base of the tree (e.g. roots lifting and/or cracks in the ground opening and closing). Other typical situations which will usually require immediate attention are:

- Tree snapped or blown over
- Tree rocking at its base – roots are likely to be damaged
- Uprooted but held up by another tree or building (hung-up)
- Large branch has broken off or is hanging off the tree

- Fallen tree or branches blocking a road, footpath, or access to property
- Tree or branches fallen on to house or car

**Policy 38: The Forestry Service will aim to attend emergency tree incidents within 1 hour of its report to assess the situation and start the process of making the site safe.**

### **Dangerous trees not posing an imminent public danger**

If not an emergency situation, a Trees & Woodlands Officer will aim to respond within 10 working days of receipt of the enquiry and the customer notified of what action is considered appropriate.

Signs to look out for which may mean that a tree is a risk to people or property but the risk does not require an emergency response include a tree which is:

- Dying - few leaves in summer or dieback in the crown
- Bark is loose and falling off
- Old splits and cracks in the trunk or large branches
- Smaller branches falling from the tree

Trees can be made safe via pruning or felling. Typically the Council would employ the most cost effective approach. For certain high value trees the Council will consider other options to reduce risk to an acceptable level including those that reduce the likelihood of the tree failing or the likelihood of persons being close to the tree if it did fail.

**Policy 39: If a tree is reported as dangerous, but after inspection the risk to the public is assessed as not high then the tree will be made safe depending on the degree of risk identified at the time of inspection by a Trees & Woodlands Officer.**

## 10. Tree Planting

### 10.1 Planting programmes

In order to maintain the number of trees in the city, it is necessary to plant trees. Trees naturally regenerate from seed and by suckering, and this is a significant factor in woodland sites, where no planting may be necessary to maintain long term woodland cover. But in parks, streets, gardens and cemeteries, planting is necessary to sustain tree cover.

When considering planting, there are a number of factors to take into account, including:

- What space will be available to the tree to grow into (both above and below ground)
- What stature or form of tree is best
- What species or variety to choose
- What type of tree stock and planting method to be used

The Council endeavours to follow a Right Tree, Right Place policy. The principle of this approach is to consider the constraints and opportunities of any proposed planting site and the desired features (or not) of proposed trees. This approach also takes into account the merits of both native and non-native tree species in order to support wildlife and safeguard against potential pests, diseases and the effects of climate change.

It is generally recognised that large trees in a city bring considerably more benefits than smaller trees. Finding room for large trees is a problem in many locations, especially streets. The Right Tree, Right Place approach is intended to allow any trees planted to reach full height and maturity and remove the requirement for regular pruning programmes, which are very resource intensive, and also to minimise any later nuisance impact.

Having a mix of native and non native tree varieties within Edinburgh is an important measure in order to safeguard against the increased risk of a devastating loss of one or more tree species due to a new pest or disease becoming established. Introducing appropriate native and non-native tree varieties within Edinburgh will also help maintain the city's historic tree cover in the face of environmental factors related to climate change. We can increase the resilience of the city's trees by keeping them as healthy, and hence as robust, as possible.

Clearly other factors should also be taken into account, such as site character and design considerations, especially as part of historic planting schemes, but there should be a presumption against single-tree, single-variety mixes that make trees vulnerable en masse to pests and diseases.

Planting native trees is generally preferred, especially if the intent is primarily to attract wildlife. But non-native trees such as sycamore make a major contribution to Edinburgh's greenspace, and in some locations the desirable variety of colour, texture, scent and form is only available by choosing non-native species and varieties. The large number of species and varieties that will grow successfully in Edinburgh can easily be observed on a visit to the Royal Botanic Garden Edinburgh.

Where native trees are selected we will endeavour to purchase trees that are of local provenance - this being especially important if replanting trees in long established or ancient woodland.

As climate change increasingly becomes a reality, planting and caring for trees in cities will become even more important. We will also need to consider which types of trees will themselves be able to cope with hotter, drier summers and warmer, wetter and windier winters. There is still uncertainty about the degree and timing of such climate changes, and therefore no clear recipe for which trees to plant or not to plant. However it is clear that reliance on single species or variety is risky and that planting a range instead is more desirable.

When the decision is taken to remove a Council owned tree, the Council will determine whether it is appropriate to replant a tree in the same place (for example a street tree) or very close by (for example in a park or green space). Any decision is made in consultation with the Roads Service and relevant Neighbourhood. Wherever possible the site will be considered as a whole, reflecting its history, character, available space, use and local interests.

Currently the Council plants on average around 300 root-balled extra-heavy standard trees (trees of 16-18 cm girth and 3 – 5 m in height) per year in parks and greenspace. This type of planting stock is relatively expensive but has proven to be much more resilient to vandalism and survival than when smaller, less robust stock has been used. Planting in woodlands and other more natural sites is more likely to use whips (trees 2 to 4 years old and ranging from 300mm to 900mm in height)

**Policy 40: The Council will endeavour to maintain its tree stock and increase current tree numbers by planting. The Council will look to increase and improve its tree cover within available resources as part of an annual tree planting programme, paying particular attention to historic street tree and park planting.**

## **10.2 Maintenance of newly planted trees**

Newly planted trees require monitoring and usually a maintenance input to ensure that they are successfully established. On occasion, additional maintenance may be required which could include weeding (either by herbicide or by the use of mulches), watering or fertilising, according to conditions, and adjustment or removal of tree ties or guards. The Council generally specifies the use of extra-heavy standard trees for streets, parks and gardens, and smaller plants such as whips or transplants for woodland areas. Extra-heavy standards are guyed underground and protected from potential damage by a high welded mesh guard supported by three tall stakes. This guarding is left in-situ for as long as possible to provide bark protection and deter vandalism.

Trees (whips) planted as part of a woodland establishment programme are not usually watered, but may need protection from a tubular tree shelter. Extra-heavy standard trees generally need watered during the first spring or summer after planting, but the frequency and quality required varies depending on local conditions.

Newly-planted trees suffer in competition for moisture with grass, so control of weeds around the base of trees is crucially important. The preferred solution is to apply mulch (e.g. wood chips) at least 1 metre diameter around the base of the tree to a depth of 100mm. Mulch will need topped up from time to time.

**Policy 41: The Council will endeavour to maintain newly planted trees appropriately to ensure they have the best chance of establishing.**

## 11. Dutch Elm Disease

Dutch elm disease was first identified in Edinburgh in 1976, and spread rapidly until, by 1985, over 1500 elms per year were becoming infected. The disease, a fungus, is invariably fatal. The beetle which spreads the fungus from tree to tree breeds in dying or dead elms, so it is imperative to remove infected elms promptly. This approach to controlling the disease, which has been in place for 37 years, means that whilst elms have all but disappeared from most towns and cities, there are around 15,000 elm trees remaining in Edinburgh.

Any public trees showing signs of the disease are felled and removed by the Council. Owners of private trees showing signs of the disease are written to and advice on the safe removal and disposal of the infected tree is provided. Dutch elm disease work is given high priority because although trees dying of the disease may only become dangerous after a year or two, failure to remove affected trees promptly allows the disease to spread rapidly, thereby increasing the overall workload.

The Council's approach to Dutch elm disease is set out in Council Executive report, "Dutch Elm Disease – Legislative Review" 08/11/2005 Item Number 21 Report number E/259/05-06/C+L.

**Policy 42: The Council will monitor the continued spread of Dutch elm disease by undertaking an annual survey of the city's elm trees, starting each June. The Council will carry out a sanitation felling programme designed to reduce the spread of the disease, and will advise private owners of what action need to be take by them.**

## 12. Heritage or Veteran Trees

Heritage (or veteran) trees are important for both their historic and cultural value at the local level and conservation value in the creation of habitats for fungi and insects. Many trees have important cultural or historical significance, whereas others have been the source of traditions or folk tales.

The Council has compiled a list of heritage trees in Edinburgh. This involved a lengthy process of background research and public consultation, which provided a list of nearly 100 potential candidates. From this original list an inventory of 52 trees were identified as notable and exceptional due to great age, size or historical and cultural significance. An information leaflet has been published identifying their value and location. In general they are located in designed landscapes, former estates and parkland.

A list of interesting or important trees can be viewed online at the Council's Edinburgh Outdoors Website: <http://www.edinburghoutdoors.org.uk/>

Trees can be made safe by pruning or felling. Typically the Council will employ the most cost effective approach but, for certain high value trees will consider other options to reduce risk to an acceptable level, including those that reduce the likelihood of the tree failing or the likelihood of people being close to the tree if it did fail.

**Policy 43: The Council will manage veteran trees sympathetically according to good arboricultural practice, striking a balance between public safety and biodiversity.**



### 13. Summary of draft Policies contained within the Policy Document

**Policy 1:** Trees in Council ownership will be inspected for safety, on a cycle between one and five years according to size, targets, condition and survey recommendation for each tree. This information will be recorded on the Council's data base.

**Policy 2:** Tree inspections will only be undertaken by people who are qualified, experienced and competent to undertake the Visual Tree Assessment (VTA) method of survey.

**Policy 3:** The Council will take steps to bring all of its trees under active, appropriate and informed management.

**Policy 4:** The Council prioritises tree work according to the individual tree's health & safety risk, taking in to account current available resources. Tree works will normally be completed in safety priority order.

**Policy 5:** The Council accepts the right of householders to remove overhanging branches, (subject to compliance with Tree Preservation Orders and/or Conservation area status) and where required will assist householders to identify a suitable arboricultural contractor who can carry out works to the appropriate standard.

**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, that the works will be agreed with the Council beforehand, that a suitable arboricultural contractor is appointed, and that each case will be considered on its individual merits.

**Policy 7:** For non-emergency tree-related safety issues a Trees & Woodlands Officer will aim to carry out a tree inspection within 10 working days of receipt and the customer notified thereafter within 5 working days of what action the Council intends to take.

**Policy 8:** Claims made in writing to the Council in relation to alleged damage caused by a council owned tree will be acknowledged within 10 working days of receipt.

**Policy 9:** The Council will not carry out works to trees, or fell them, unless it is necessary to do so. When works are carried out, the reasons for the work will be documented and recorded.

**Policy 10:** Disposal of arisings: Where practicable, all arisings (logs, branches etc) from tree works in high amenity areas will be removed. In woodland situations however standing dead wood, logs and chippings may often be left on site, where this can be done safely, to enhance biodiversity and increase wildlife habitats.

**Policy 11:** Management of ivy and trees: The Council will control ivy on trees where it is having a significantly negative effect.

**Policy 12:** The Council will seek to remove stumps promptly where practicable and appropriate. In woodland locations, stumps will generally be left to decay in situ

**Policy 13:** The Council will undertake work to a tree in its ownership to maintain clear sight lines (where reasonably feasible) at junctions and access points (associated with a street, road or highway).

**Policy 14:** The Council will undertake measures to make safe an unacceptable trip hazard in streets, roads or the public highway caused by the growth of a council owned tree.

**Policy 15:** The Council will undertake measures to make safe any unacceptable carriageway obstruction due to trees in streets, affecting roads or the public highway caused by the growth of a council owned trees.

**Policy 16:** The Council will undertake work to a tree in council ownership to maintain a minimum 5.5 metres height clearance over the carriageway - where reasonably feasible.

**Policy 17:** The Council will undertake measures to make safe any unacceptable carriageway risk due to private trees in a dangerous condition, within falling distance of roads, or the public highway.

Policy 18: The Council will undertake work to a council owned tree to maintain a minimum (where reasonably feasible) 3.0 metres height clearance over a footpath associated with a street, road or highway.

**Policy 19:** The Council will undertake work to a tree in its ownership to ensure that it does not unduly obstruct the streetlight zone of illumination.

**Policy 20:** The Council will ensure that all construction and development, including temporary installations and placement of movable equipment, near to trees follows BS:5837 (2012) "Trees in relation to design, demolition and construction - Recommendations" and that the most recent National Joint Utilities Group "Guidelines for the planning, installation and maintenance of utility apparatus in proximity to trees" are followed where carrying out works in root protection areas cannot be avoided.

**Policy 21:** The Council will undertake work to a tree in its ownership to ensure that trees do not unduly obstruct traffic signals or street signs.

**Policy 22:** Where a Council owned tree or woodland is associated with criminal activity and/or anti-social behaviour, measures to alleviate the problem will be implemented on a site-by-site basis in consultation with the Police, communities and neighbourhood teams.

**Policy 23:** The Council will investigate reports of vandalism to a council owned tree or woodland and try to correct any damage where appropriate and within available resources.

**Policy 24:** The Council will not prune or fell a Council owned tree simply because it is considered to be 'too big' or 'too tall'.

**Policy 25:** The Council will not prune or fell a Council owned tree to remove or reduce leaf fall or remove fallen leaves from private property.

**Policy 26:** The Council will generally not prune or remove trees in cases where they cause a reduced amount of light to fall on a property, other than in exceptional circumstances.

**Policy 27:** The Council will not prune or fell a Council tree to remove or reduce bird droppings from trees, or remove bird droppings from private land.

**Policy 28:** The Council will not prune or fell a Council owned tree to remove or reduce the nuisance of fruit/berries or nuts, or remove such fallen fruit from private land. However, where fallen fruit is leading to significant anti-social behaviour problems it will consider measures to reduce the problem, including whether a phased removal and replacement with alternative species is reasonable.

**Policy 29:** The Council will not prune or fell a Council owned tree to remove or reduce honeydew or other sticky residue from trees.

**Policy 30:** The Council will not prune or fell a Council owned tree to remove or reduce the release of pollen.

**Policy 31:** The Council will generally not prune or fell a Council owned tree to remove or reduce interference with telephone wires.

**Policy 32:** The Council will generally not prune or fell a Council owned tree to prevent perceived interference with TV / satellite installation / reception.

**Policy 33:** The Council will not prune or fell a Council owned tree to remove or reduce incidence of perceived pests such as bees, wasps, or wild animals.

**Policy 34:** The Council will not prune, fell or cut the roots of a Council owned tree to prevent roots entering a drain that is already broken or damaged.

**Policy 35:** In the event that a Council tree is causing damage to property, a Trees & Woodlands Officer will aim to respond within 10 working days and, if appropriate, remedial works will be undertaken.

**Policy 36:** The Council will generally not prune or fell a tree in Council ownership to alleviate the nuisance of overhanging branches.

**Policy 37:** The Council will generally not prune or fell a Council owned tree to improve the view from a private property.

**Policy 38:** The Council's Forestry Service will aim to attend emergency tree incidents within 1 hour of its report to assess the situation and start the process of making the site safe.

**Policy 39:** If a tree is reported as dangerous, but after inspection the risk to the public is assessed as not high then the tree will be made safe depending on the degree of risk identified at the time of inspection by a Council Trees & Woodlands Officer.

**Policy 40:** The City of Edinburgh Council will endeavour to maintain its tree stock and increase current tree numbers by planting. The Council will look to increase and improve its tree cover within available resources as part of an annual tree planting programme, paying particular attention to historic street tree and park planting.

Policy 41: The Council will endeavour to maintain newly planted trees appropriately to ensure they have the best chance of establishing.

**Policy 42:** The Council will monitor the continued spread of Dutch elm disease by undertaking an annual survey of the city's elm trees, starting each June. The Council will carry out a sanitation felling programme designed to reduce the spread of the disease, and will advise private owners of what action needs to be taken by them.

**Policy 43:** The Council will manage veteran trees sympathetically according to good arboricultural practice in respect to veteran trees, striking a balance between public safety and biodiversity.

## Appendix 1

### Summary of current planning policy framework relating to trees and woodlands

The adopted **Edinburgh City Local Plan** has a policy relating to trees, which states:

‘Development will not be permitted if likely to have a damaging impact on a tree or trees protected by a TPO or other trees worthy of retention on or around a proposed development site, unless necessary for good arboricultural reasons. Where such consent is granted, replacement planting will be required to offset the loss to amenity.’ (Policy Env 12 Trees)

The adopted **Rural West Edinburgh Local Plan** has two policies relating to trees. Policy E15 aims to prevent the loss of healthy mature trees on development sites and requires replacement planting for any lost woodland trees or hedgerows. Policy E16 promotes the use of TPOs and the protection of trees subject to TPOs from development. This policy also supports woodland planting, enhancement and encourages planting of native species.

A new Edinburgh Local Development Plan is in preparation, and once adopted will replace the existing two Local Development Plans.

**Supplementary planning guidelines** relating to trees and woodlands give more detailed information on the Council’s requirements, and principles to be applied when considering trees in relation to development proposals. The planning guidelines require compliance with the British Standard (BS 5837:2012), to achieve a satisfactory relationship between trees and new development. The relevant planning guidelines are:

- Trees and Development
- Landscape and Development
- Biodiversity

Work is underway to consolidate these planning guidelines into one **Edinburgh Design Guidance** document. This is currently being finalised. The requirements for trees and woodlands in relation to development remain broadly the same:

Compliance with the approach and principles in the British Standard (BS 5837:2012)

Assessment of the existing trees and woodlands and their retention in the final layout where appropriate

Contributions to an improved habitat network through woodland creation and tree planting

### Trees and development

The Scottish Planning Policy (paragraphs 146 to 148) outlines the protection which should be given by Planning Authorities to trees and woodlands in relation to development. In summary:

- Ancient and semi-natural woodland is an important and irreplaceable national resource that should be protected and enhanced, as should other native and long established woodlands with high nature conservation value.
- Other woodlands, hedgerows and individual trees, especially veteran trees, may also have significant biodiversity value and make a significant contribution to landscape character and quality so should be protected from adverse impacts resulting from development. If a development would result in the severing or impairment of connectivity between important woodland habitats, workable mitigation measures should be identified and implemented, potentially linked to the creation of green networks.
- Where appropriate, planning authorities should seek opportunities for new woodland creation and planting of native species in connection with development schemes.

- Tree Preservation Orders can be used to protect individual and groups of trees considered important for amenity or because of their cultural or historic interest.

The Forestry Commission Scotland Advice Note 'The right tree in the right place' also forms part of the national policy framework for local authorities.

Where trees are affected by development, the Council promotes the protection of existing trees and requires the planting of new trees as appropriate.

Through planning policies the Council aims to:

- Retain trees of landscape, biodiversity or amenity significance
- Encourage new tree planting wherever appropriate within new development to strengthen woodland habitat networks and help to deliver the CSGN
- Promote a substantial renewal of the city's woodland resource
- Effectively manage existing trees and woodlands.

### **Tree Protection Charter – Tree Preservation Orders and Conservation Areas**

The Council is committed to the protection of trees and woodland within the City of Edinburgh. This is achieved by the making of Tree Preservation Orders (TPO) and by the protection of trees within Conservation Areas. Where trees are affected by development, the Council promotes the protection of existing trees and requires the planting of new trees as appropriate.

The Council's Tree Protection Charter sets out the process for protecting trees, and the levels of service which members of the public and others can expect from the Council regarding tree protection and works to protected trees.

TPOs are made by a Planning Authority under Section 160 of the Town and Country Planning (Scotland) Act 1997 (as amended) and within the procedures set out in the Town and Country Planning (TPO and Trees in Conservation Areas) (Scotland) Regulations 2011.

The process relating to **TPOs** is outlined below:

- Notice of a Tree Preservation Order is served on the owner and advertised by the Council's Planning service. Anyone may comment or object within 28 days. Acknowledgement and notification of decisions will be sent to all who submit comments. Anonymous comments will not be considered.
- Following the consultation period, and within six months, the Council Planning Committee will confirm, modify or not confirm a TPO, taking into account the comments received.
- If confirmed, the TPO is again served on the tree(s) owner(s). It is also recorded in the Register of Sasine and imposes a legal burden attached to the title of the land.
- Where a TPO is in place, prior consent in writing is required from the Council's Planning service to carry out any work on the trees. An owner wishing to carry out work must apply in writing. If consent is given the work must be carried out within two years.
- If the applicant objects to the decision or conditions imposed, an appeal can be made to Scottish Ministers within 28 days.
- Contravention of a TPO is an offence, liable to prosecution, subject to a fine of up to £20,000.

The process relating to **Conservation Areas** is:

- Before carrying out any tree work within a Conservation Area, the owner of the tree must give 42 days written notice to the Council, detailing the work and identifying the trees.

- An officer will then carry out a site inspection to assess the impact of the proposals on the local amenity. Advice and recommendations will be offered.
- If the trees are deemed to be of significant public amenity value and are considered to be at risk, a TPO may be served to prevent adverse work being carried out. This is the only way the Planning Authority can protect the trees; it cannot otherwise refuse consent.
- If, after 42 days, the Planning Authority has not responded and if a TPO has not been served, the specified work may proceed. The work must be carried out within two years of the notification.
- If work takes place without notification, similar penalties apply as for TPOs.
- Unauthorised work on protected trees will be investigated as a matter of urgency.

The Tree Protection Charter should be referred to for fuller information, and for information relating to emergency works.

### **Woodland Habitat Action Plan**

Woodlands within the Edinburgh area represent a valuable resource for people and wildlife alike. The Woodland Habitat Action Plan, part of the Edinburgh Biodiversity Action Plan (2010-2015), details key objectives and actions to protect, enhance and expand woodlands in the city.

## Trees in the City - Draft 5 year action plan

	Trees and the sustainable City	Priority	Timescale	Lead body	Other Partners	Comment
1.1	Create a prioritised list of street tree locations and plant replacement trees.	High	13-14, ongoing	CEC P&G	CEC Roads	
1.2	Identify streets where new street tree planting can be introduced, and consult with others.	Med	14-15	CEC P&G	CEC Roads CEC Planning	
1.3	Consult with others and create a policy to guide tree planting by the Council, with the aim of increasing resilience in the light of climate change and disease threats.	High	13-14	CEC P&G	CEC Sustainability	
1.4	Adopt a tree valuation model, to be applied as policy to aid decision-making around tree removals.	Med	14-15	CEC P&G	FCS, ELGT	
1.5	Env 6 Promote woodland management and creation as a key component of sustainable flood management initiatives	Med	13-14, ongoing	CEC P&G CEC Planning		ELFWS action
1.6	Env 7 Identify locations where new planting or woodland management can help increase slope stability.	Med	13-14, ongoing	CEC P&G CEC Bridges& Structures		ELFWS action
1.7	Env 10 Where appropriate, prioritise planting of street trees in urban AQMAs, and woodland expansion along strategic road corridors and adjacent to industrial estates.	High	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	ELFWS action
1.8	Env 17 Promote the importance of managing and increasing trees and woodlands in urban areas to conserve and enhance townscape character	Med	13-14, ongoing	CEC P&G CEC Planning		ELFWS action

	Trees and the sustainable City	Priority	Timescale	Lead body	Other Partners	Comment
1.9	Env 19 Promote positive management of historic gardens and designed landscapes and heritage trees to maintain their historic and cultural significance and increase resilience to climate change.	Med	13-14, ongoing	CEC P&G CEC Planning		ELFWS action
1.10	Env 19 Encourage forest restructuring to improve the setting of historic sites and landscapes.	Med	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	ELFWS action
1.11	CC1 Expand woodland cover within Edinburgh and the Lothians as a means of increasing carbon sequestration and reducing net carbon emissions, following the guidance provided in Sections 3 and 5 of the ELFWS.	High	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	CC1 Policy
1.12	CC6 Promote positive and proactive management of key tree species and woodlands improve their resilience to climate change.	High	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	ELFWS action
1.13	CC7 Identify important individual historic trees and species that are vulnerable and begin succession planning to maintain contribution to character and significance.	Med	13-14, ongoing	CEC P&G CEC Planning		ELFWS action



	<b>Trees and communities</b>	<b>Priority</b>	<b>Timescale</b>	<b>Lead body</b>	<b>Other Partners</b>	<b>Comment</b>
2.1	Provide better information through the web on tree operations and policies that concern trees and woodlands	High	13-14, ongoing	CEC P&G		
2.2	Reorganise and relaunch the voluntary Tree Warden scheme in partnership with Friends of Parks, amenity groups and others	Med	14-15	CEC Forestry	Friends groups, Tree Council	
2.3	EC 24 Develop and publicise opportunities for active outdoor recreation in woodlands and forests, including mountain-biking, walking and activities such as orienteering.	High	13-14, ongoing	CEC P&G CEC Planning CEC Transportation		ELFWS action
2.4	QL 1 Ensure that existing and new forests and woodlands are managed to create new opportunities for active travel, including walking, cycling and horse riding connecting settlements and the countryside.	High	13-14, ongoing	CEC P&G CEC Planning CEC Transportation	FCS, ELGT	ELFWS action
2.5	QL 3 Promote the role of woodlands in providing a resource for physical activity, accessible to all parts of society close to where people live and work.	High	13-14, ongoing	CEC P&G	FCS, ELGT	ELFWS action
2.6	QL 6 Support community involvement in woodland projects, especially through mentoring and co-ordinating delivery of activity on the ground. There should be a particular focus within WIAT Priority Areas.	High	13-14, ongoing	CEC P&G	FCS, ELGT	ELFWS action
2.7	QL 8 Support community woodland groups particularly in areas with high levels of multiple deprivation.	High	13-14, ongoing	CEC P&G, CEC	FCS, ELGT	ELFWS action
2.8	QL 9 Increase awareness of the role of woodlands as an outdoor learning resource and a resource for education, training and lifelong learning.	High	13-14, ongoing	CEC P&G, CEC Children & Families	FCS, ELGT	ELFWS action
2.9	QL 11 Promote the development of outdoor learning opportunities including in woodlands and forests.	High	13-14, ongoing	CEC P&G, CEC Children & Families	FCS, ELGT	ELFWS action

	Trees, woodlands and Green Networks	Priority	Timescale	Lead body	Other Partners	Comment
3.1	Identify sites where trees could be planted to enhance the linkages between green spaces, and to assist in the delivery of the Living Landscapes project.	Med	15-16	CEC Forestry	FCS, ELGT	
3.2	EX1 Support delivery of new woodland areas in the CEC authority area	Med	13-14, ongoing	CEC Planning	FCS, ELGT	ELFWS action
3.3	EC24 Policy Create new woodland on the CEC estate	Med	13-14, ongoing	CEC P&G	FCS, ELGT	ELFWS action
3.4	Env 1 Promote the establishment of new native woodlands as part of integrated habitat networks.	Med	13-14, ongoing	CEC Planning	FCS, ELGT	ELFWS action
3.5	Env 2 Where there are suitable opportunities, enhance ancient and semi-natural woodland.	Med	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	ELFWS action
3.6	Env 4 Increase the proportion of existing woodland brought into positive management.	High	13-14, ongoing	CEC P&G CEC Planning	FCS, ELGT	ELFWS action

	Effectively managed trees	Priority	Timescale	Lead body	Other Partners	Comment
4.1	Publish tree management policies after consultation	High	13-14	CEC P&G		
4.2	Continue to extend the Ezytreev database to cover all trees in CEC ownership.	High	13-14, ongoing	CEC Forestry		
4.3	Publish tree work schedules in advance.	Med	13-14	CEC Forestry		
4.4	Continue to work in partnership with others, such as Edinburgh & Lothians Greenspace Trust to deliver woodland management work	Med	13-14-ongoing	CEC Forestry		ELGT
4.5	Work towards the elimination of any waste from tree operations and no woody waste to go to landfill.	Med	13-14	CEC Forestry		







**Appendix 2: Trees in the City - Tabulated comments received and draft responses.**

Comment No.	Individual or group?	Comment	Draft Response
1	Scottish Natural Heritage	<p>Thank you for your consultation of 1 October 2013 regarding the above Plan. We welcome this document and the emphasis on the variety of benefits that trees bring. We recognise the importance of trees for biodiversity, landscape and health, and the increase in amenity and appreciation of urban landscapes gained from urban trees and woodland.</p> <p>We support the comments that mature or large trees bring greater benefits, or have higher value, when compared with newer planting or smaller species. We wish to emphasise the importance of increasing the resilience and diversity of trees in the city against future threats of climate change and disease. As discussed in 10.1 Planting Programmes, we would agree that increasing the height /age structure and range of species, including species of high value for biodiversity, will maximise their resilience and value.</p> <p>The section on Potential Opportunities, as well as Preferred Opportunities, will be important in delivering and addressing the range of benefits and issues discussed in the document and development sites may well play a part in contributing to these aims. The Action Plan contains many positive actions in the delivery of the above and we would be happy to contribute where relevant.</p>	The support of Scottish Natural Heritage is welcomed. Comments noted.
2	Edinburgh & Lothians Greenspace Trust	After having a careful look through the Trees in the City consultation document, I would like to confirm that ELGT are in support of the document. We are happy to be a partner for a number of the items highlighted in the Action Plan.	The Support of Edinburgh & Lothians Greenspace Trust is welcomed. Comments noted.
3		There are a number of things of note: 2.2 Disease Sudden oak death (Phytophthora ramorum) is not a primary threat to English and sessile oaks in the UK. It is more of an issue on other species like larch, rhododendron, etc. It may also be worthwhile mentioning the oak processionary moth as a threat.	Noted. Corrections made after advice from Forestry Commission Scotland. Oak processionary moth will be included in the section on threats.
4		Pp 19. I think it would be good to define the target for woodland creation on CEC owned land.	This issue is contained in Action Plan note 1.11
5		6.4 and 8.13 - Should be BS3998:2010.	Correction has been made.
6		7.9 Vandalism – removing guards after three years in my opinion is too soon due to the problems of grass cutting, etc. I've seen trees that were planted when I was at the Council over 6 years ago that have just had their guards removed and they've been badly damaged by grass cutting and strimming by un-skilled staff.	Tree guards are left on newly planted trees for as long as possible to protect them during grass cutting operations. Any trees damaged during cutting are reported so that this issue can be addressed appropriately.
7		Policy 29 and 30...one says will not the other says generally not...wondered why there was a difference between the two.	The policy wording has been amended to make this clearer.
8	Lothians & Fife Green Network Partnership	(is it gean or cherry?, or is cherry meant to cover all the Prunus genus?)	In the context of native trees Cherry refers to Gean (Prunus avium).
9		Given the cross-cutting nature of the document is it challenging to discern exactly how prescriptive it can be in interfacing with other council policies (such as transport and economic development) – generally though we consider this document to have a well balanced approach with good information and sources of reference where required. Specific notes included in the comments below.	Comment Noted.
10		We feel this is about right and on the latter, explains well the rights and responsibilities of owners and neighbours whether private or council. There is more that could be made of the value of trees and woodlands, possibly using an ecosystem services type framework, and we note the use of existing valuation methods as already used elsewhere (CAVAT, Helliwell). This might be part of an educational exercise toward less specialised users of the strategy in informing of the value of trees and woodlands in the urban environment. For example, it would be compelling to know the %age annual contribution trees and woodlands in CEC make to the CEC's operating carbon costs (or CRC) or the %age of miles travelled each year by car of Edinburgh residents is offset by sequestration.	Comments Noted. With the current data we hold, we are currently unable to state the operating carbon cost or mileage travelled by car offset by trees in the city.
11		We are pleased to see reference to the CSGN and SESPlan and their respective priorities, the role of the Local development planning process and the supplementary planning guidance in support of trees and woodland through the development planning and management process. Also the consideration of use of vacant and derelict land as an opportunity. It would be useful to have a policy relating to transport planning that considers the opportunity for the use of tree and hedgerow barriers not just for landscaping but also for habitat, reduction of noise and improvement of air quality considerations (noted inclusion of this in the action plan).	Comment Noted. This policy relates to Council owned trees. Review of planning policies is not within the scope of this document.
12		Yes, and we note the alignment of actions with the E&LFWS and ownership taken by the city Edinburgh Council of a number of these.	Comment Noted.
13	Forestry Commission Scotland	Many thanks for consulting Forestry Commission Scotland on the Trees in the City - Trees and Woodland Action Plan. By way of constructive feedback, the only observation I would like to make is that it would perhaps aid the reader if it were made clear near the beginning of the document who the main users of the document would be and how the document fits into the existing planning system. Other than that, I would like to congratulate the council in pulling together a very useful document which has the support of FCS.	The support of Forestry Commission Scotland is welcomed. Comments noted.
14	Friends of the Meadows and Bruntsfield Links	The plan is comprehensive and contains a large amount of information which is clearly presented and of great value.	Comment Noted. The support of Friends of the Meadows and Bruntsfield Links is welcomed.

15		It is clear on the ground that a large number of (mainly younger) trees have not been maintained effectively. For example along Leamington Walk many smaller trees have died and vegetation has been allowed to grow too high within support framework. The ground around tree bases has not always been treated well. Council mowing machines continue to damage bark and it appears that chemical weed killers have been used excessively at some tree bases. During periods of drought younger trees can suffer but in other local authority areas this problem has been tackled by effective tree maintenance programs including watering.	Comment Noted. Weed control is carried out by Task Force teams. A watering programme is in place for newly planted trees.
16		Question: Can the plan clarify a process for more effective maintenance and management of existing stock in the form of either more resources and staff and/ or a much closer and effective liaison with local community groups and independent funding bodies? Is the plan able to identify future increases/sources of funding?	Increasing rates of tree survival are an intrinsic part of Forestry Service activity. Better liaison is an action identified in the plan. The Council works with partners to secure additional funding, and grants schemes develop and change from time to time.
17		Although a survey has identified numbers and condition of existing stock there is no mention of preparation of future planting design framework. For example it might be expected that professional landscape designers might be commissioned to prepare a tree planting strategy. This would include type and relationship of trees to each other, height, colour, foliage, seasonal growth and appearance, effect on vistas, effect on views of buildings, filling of gaps where trees have been lost or felled etc. Consultation with the local community should also take place before new trees are planted.	Tree planting design work is carried out by the Forestry Service in consultation with the Neighbourhood teams, Parks friends groups etc.
18		Due to scarcity of local authority funding the plan should perhaps emphasis more clearly how communities can be supported and empowered more directly to take an active role in maintaining and enhancing the city park landscape. Mention should be made of the need for council departments to liaise better when improvements are made to pathways and hard surfacing adjacent to existing trees. In recent cases works have proceeded without prior consultation (enlarged cycle route and recycling area).	New Policy 20 provides better guidance on management of streetworks in relation to trees. It is accepted that there is a wider question regarding community empowerment which is currently outwith the scope of this document.
19	Individual	Despite the above FOMBL are fully supportive of the aims of this excellent Action Plan.	
20		a. The document has a high profile and is very well constructed. b. Not aware of any factual errors and typographical errors are few and far between. However I suggest that it would be helpful if there was an extra "flap page at either the front or back of the document to make available for easy use an alphabetic list of all acronyms used in the document.	Comment Noted.
21		c. The document has been well-publicised, covers many aspects and is readily understandable. It will attract attention from the public, and is thus fit for purpose. However there was some difficulty in processing and entering feedback into the electronic file. That may however have been due to the lack of suitable software available at home and even in the public library. It also may have been partly due to lack of time on my part.	Comment Noted. A glossary has been included.
22		I think that a good balance has been maintained. However more mention could have been made of fungi and their positive and negative roles in the growth and health of trees. Trees and fungi: Staff should receive adequate training in the recognition of species of fungi which are a threat to healthy tree growth and to public safety. Many fungi do not pose a great threat to trees and others can be beneficial. However the recognition of the signs of Kretzschmaria (=Ustilina) deusta and the ability to distinguish it from other species is important so that no tree is felled on the grounds of the presence of K.deusta without a verified identification.	All Trees and Woodlands Officers are certified as capable of identifying the key decay fungi. No tree has been felled without confirmation of suspected disease being present. No tree is felled unless absolutely necessary. Comment Noted.
23		It is also important that Meripilus (=Grifola) giganteus is recognised as early as possible so that the grass-cutters do not carry the fungal matter from one tree to another and thus distribute a major fungal threat to trees. This procedure has resulted in major damage to and consequent losses to park trees - particularly species of Sorbus. Every effort should be made to ensure that tools are cleaned regularly after pruning or felling a diseased tree in order to reduce the danger of transfer of fungal tissue or spores when later pruning healthy trees. Tree removal: There is a perception that permission is given readily to householders to have trees removed or trimmed e.g. in conservation areas. On the other hand trees on Council-owned land which pose a traffic problem or other hazard may remain without the necessary attention for a very long time. It is presumed that in the former cases prompt action is because it is the householder who bears the cost of the work. When the bill has to be met by the Council there can be lengthy delays which can result in continuing threats to public safety.	Comment noted. Expert advice will be sought regarding disease control measures. It is anticipated that the tree policies will assist in getting priority tree works done more quickly, but this may result on non-priority work taking longer.
24		A greater emphasis on the importance of wildlife "corridors" would be welcome and aims to increase public and householders' awareness of their possible role in supporting such corridors. ** All funded tree surveys recording species of trees by numbered tags should have strict sample checks for validity of results.	It is intended that partnership working with ELGT and Lothians Forest Green Network Partnership will lead to improvements in wildlife corridors. Comment Noted.
25		protection when young. Staking of trees and protective enclosures should be such that branches are not twisted and bent when standard trees are planted. An area clear of vegetative growth should be made around a new standard tree when the planting hole is dug and thereafter could be kept free of further plant intrusion by the application of woodchips. Young newly-planted standard trees should not only have a buried hose-pipe for watering but must have regular supplies of water by that route.	specification which has proven to provide the best solution for tree establishment within the challenging urban environment of the City.



26		<p>Millennium woodland - Where appropriate and at a suitable stage of development areas of Millennium woodland should be thinned and have lower branches of trees removed. If suitable "desire" paths have already become established they should be respected and minimally enhanced during the thinning process. If the route of the paths is not suitable (e.g. leading to an inappropriate exit from the woodland or to private property) some new planting should take place in order to block the route.</p> <p>Biodiversity - Account should be taken of the food, shelter and over-wintering requirements of animal, bird and insect life in line with good biodiversity practice. Where possible, logs and standing deadwood should be retained to provide and enhance wildlife habitats and food sources. Similarly "brush" should be stacked for wildlife shelters. The under-storey should be reinforced with plants to provide food and shelter for wildlife. The Invasive non-native species of Japanese knotweed and Himalayan Balsam each pose a significant and increasing problem in several areas of woodland and should have major attention. The increasing spread is a serious threat to the continued healthy growth of native wildflowers and can inhibit the growth of newly planted tree whips. If sufficient manpower could be made available the planting and management of hedges could help restore some habitats and wildlife corridors. Routine management - Special care should be taken in areas which are subject to regular grass-cutting. A margin should be maintained between the mown area and the tree trunks such that the trunk is not subject to damage by the mower. An even greater margin must be maintained if the tree roots are above or very near the surface.</p>	<p>Management of Millennium woodlands has been carried out in partnership with ELGT over the past 2 years. A continuing programme of woodland management is planned in conjunction with a Social Enterprise partner. Comments Noted.</p>
27		<p>Branches or trees which have had to be removed can become a useful resource. If chipped onsite the chippings can be used to restrict weed encroachment around tree trunks; present a barrier to grass-cutters from damaging the base of tree trunks; inhibit weed growth around bushes; and (provided the chippings are used in sufficient quantity) can be used to make muddy paths more useable, safer and attractive. Established woodland with mature trees - When significant numbers of mature trees are felled and removed for sale and unless there is a good reason otherwise the resulting revenue should be used to replace and support the woodland from which the trees were removed. When a mature woodland requires trees to be felled for safety reasons such as age or wind-damage cognisance should be taken of the species which have thrived and reached maturity. Similar replacement species should be considered so that the balance of species is maintained. Large tree stumps need not always be removed but can provide attractive informal seating areas for both adults and children. They can also be a reminder of the character and age of the parkland/woodland.</p> <p>Voluntary involvement - It is to be regretted that there is little awareness and continued activity regarding the identification and recording of 'heritage trees'. The Edinburgh Tree Warden scheme seems to have been ignored and unused in recent times and what was a very active group is no longer being used. The excellent work involved many volunteers and the interest generated has now been lost due to inactivity. A Tree Warden website <a href="http://www.treewarden.org.uk">http://www.treewarden.org.uk</a> was constructed but now has little or no new actions to report.</p>	<p>Comments noted. No trees are removed purely for the purpose of selling the timber. Consultation with stakeholders takes place regarding replacement tree planting via local neighbourhood office and Friends Groups. The rationale for the policy on the removal (or not) of tree stumps is described.</p>
28	The Landscape Institute Scotland	<p>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. 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).</p>	<p>Comments Noted. Links have been added where possible.</p>
29		<p>A minor reference to a BS number identified. 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"</p>	<p>Corrections will be made. The full title of British Standards have now been added throughout.</p>
30		<p>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.</p>	<p>Comment Noted. Review of planning policies is not within the scope of this document.</p>
31		<p>Possibly more needs to be mentioned about risks, or at least explaining, for example, subsidence and trees.</p>	<p>Guidance on subsidence within Edinburgh will be included.</p>
32		<p>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.</p> <p>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.</p>	<p>Comments noted. A section detailing the aims and scope of the document has been added. Redrafting has attempted to reduce repetition.</p>
33		<p>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" Page 5 Section 1.2 – this might read better if placed after all the benefits have been listed.</p>	<p>Comments Noted.</p>
34		<p>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?</p>	<p>Correction will be made. Comment Noted.</p>
35		<p>Page 9 – Problems posed by trees should not be in the "Benefits of Trees" section. Perhaps have a sub-section for this topic.</p>	<p>It is considered that problems posed by trees are comprehensively dealt with in the Policy section.</p>
36		<p>Section 2.3 The Valuation of Trees – please add references to the systems mentioned (Helliwell, CAVAT, i-Tree)</p>	<p>A glossary has been added.</p>
37		<p>Section 2.4 i-Tree Eco Valuation – last paragraph p12 – can these species list be presented as a bullet point list?</p>	<p>Comment Noted.</p>
38		<p>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? If Edinburgh's trees sequester the equivalent of 135million kilometres of car usage, do we know how many million kilometres 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. P13 paragraph 5 – this seems overly technical and complicated to follow. Where is the 'low', 'central' and 'high' scenarios introduced and explained? – the traded values in £ - which I assume reflects the "Importance Value" – how is this actually realized through carbon-trading scheme(s) ?</p>	<p>Comment Noted. The i-tree study was carried out by Forest Research, its findings are reported in the document.</p>
39		<p>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.</p>	<p>It is felt that the benefits of trees have been well described in the document.</p>

40		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.	Comment Noted.
41		Table 1 – is ENV 12 missing?	Policy ENV 12 (and 11) was purposely omitted -only those FWS actions which were relevant were quoted in the action plan.
42		Page 29 bullet points - replace them with the trees? • Survey its trees • Have this done by a competent person • Take reasonable action to ensure that they are reasonably safe 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. 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: <a href="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</a>	The Council is investigating the feasibility of making the tree data held within Ezytreev publicly available via the Council website. Comments Noted.
43		Page 32. BS5837 should read BS5837:2012 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"	Correction has been made. The intention of this policy is considered to be clear.
44		Page 33. BS3998:1998 is now BS3998:2010	Correction will be made.
45		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 council's 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 types 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.	The section on Telephone Wires has been clarified.
46		Page 41. 8.13 refers to "arborist" – is the preferred term now arboriculturist ?	Arborist ( a person who carries out tree work) and Arboriculturalist (a person engaged in the management of trees) are both commonly used terms within the industry.
47		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" <a href="http://www.edinburgh.gov.uk/a_to_z/service/940551/">http://www.edinburgh.gov.uk/a_to_z/service/940551/</a> also add an entry "Dangerous Trees".	Correction will be made. Comment Noted.
48		Page 45 – Please provide hyperlink to the Dutch Elm Disease report. 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?	Comments Noted. Links will be added where possible?
49		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.	Correction will be made. This document is a policy on the care of council owned trees.
50	Garden History Society in Scotland	The central problem with the document is that its purpose/objectives are not made clear at the beginning. The paper would benefit from an introductory section that all important aspect of woodland and tree management fits into what appears to be an overarching policy that tree work will not be permitted unless a tree is dangerous	The scope of the document will be revised clearly setting out the purpose and objectives.
51		The GHSS has not identified factual errors in respect of gardens and designed landscapes, but is doubtful whether their importance has been recognised in the consultation document.	Comment Noted.
52		Tree Eco Valuation is, why it was developed, what relevance it has to Edinburgh and why CEC chose this method of measurement; yet it appears to underpin the policies in section 4. This type of 'science' is challengeable of a report. The detailed description of methodology, for example, interrupts the narrative and would be better as back up information in an appendix.	A preface setting out the objectives and scope has been added. Comments Noted.
53		The value and potential hazard presented by trees is set out clearly. However, what is missing from the discussion is the importance of trees within the Edinburgh streetscape, parks, gardens and open spaces. Also missing is reference to the long term management of individual trees and woodlands where removal and clearance cannot be left until trees are dying or diseased.	The Long term management of trees is set out in the context of available resources and the Health & Safety approach to management. Comments Noted.
54		The policies are generally clearly described and easily understood.	Comment Noted.
55		The policies are reasonable in so far as they go.	Comment Noted.
56		The primary interests of the GHSS are designed landscapes and gardens, in this context we request that CEC consider and include the issues around the historic parks, squares, gardens and policy woodlands of Edinburgh where trees have been used to frame views, define boundaries and add colour and form to open spaces.	A preface setting out the objectives and scope has been added. Comments Noted.
57		The GHSS is of the opinion that a policy is required to cover trees within the historical environment where the 'value' is subordinate to the historical design with particular reference to views. In other words there should be a policy that permits the removal of trees that have been carelessly sited (for whatever reasons, often long ago) for reasons other than health and safety from within historic parks, squares and gardens. A case in point would be views to Edinburgh Castle from the New Town Gardens. The GHSS would welcome the opportunity to assist with framing such a policy.	It is considered that there is sufficient flexibility within current policies to allow this, should it become a sufficiently high priority to take precedence over safety and disease control work.

58		The GHSS draws your attention to the fact that many of the former estate woodlands that frame Edinburgh's parks and gardens and contribute to the skyline are aging and in need of careful management. Clearance to create zones for replanting cannot be governed by health and safety actions alone and a more substantial approach to clearance is required to establish woodland with a healthy age structure. A policy is therefore required that governs the management of woodlands and makes clear that zones will be cleared, replanted and managed in the interest of woodland species and age diversity. The GHSS would welcome the opportunity to assist with framing such a policy.	The management of trees takes place in the context of limited resources and a balanced approach as set out in "Common Sense Risk management of Trees.". Comments Noted.
59	Individual	Although the majority of the document is clear what is not clear is where responsibility lies for trees which are privately owned but which are either subject to a TPO or are within a conservation area. The consultation document does not give any clear guidance as to who is responsible for the costs associated with those issues. For example we have had to spend significant amounts of money on having the patio jet washed and sealed this year due to the honeydew, and had to clean the garden furniture on a daily basis before being able to use it.	A preface setting out the objectives and scope has been added. Comments Noted. Liability for trees generally lies with the land owner where the tree is located.
60	The Grange Association	The following points are noted as relevant to the residents of The Grange • It is important to increase the number of street trees • Older and larger trees in the City are currently under-valued and should not be removed.	Comment Noted. Trees are only removed if absolutely necessary.
61		Overall the Grange Association (GA) warmly welcomes this consultation as we share the values expressed in the document.	Comment Noted. The support of the Grange Association is welcomed.
62		P6 • Conservation area and inventory listed gardens are designated in the 'sensitive' category p17. This means that the Council will 'reinforce key assets and succession planting for feature trees.' We would like to recommend that the Council distils this information and produces a shorter, user friendly, advisory leaflet to inform householders of their rights and obligations.	A summary document will be produced.
63		We are aware that the Council has to prioritise its workload. However we are concerned about delays in response to applications to the Arboriculturalist beyond the 6 week standard for planned tree work. We know of cases where trees have been lost. So although we realise that the intentions of the Council are to meet standards and preserve the tree-scape, we recognise that there must be sufficient staff to enable the Council to deliver on the conservation values expressed so clearly in this document.	It is anticipated that response times will be improved and work prioritisation clarified by the adoption of the policies.
64		In summary, the policies are good and we agree with their intent. We would like to support the Council in any way we can in implementing the policies.	Comment Noted.
65	Individual	With regard to the trees leading to Corstorphine Hill Cemetery. I would like to know how the new rules contained within the "City's Tree Policy" are going to affect the problem we are having trying to get the trees bordering our property made safer.	Trees leading to Corstorphine Cemetery are inspected and if work is required will be added to the Forestry Service work schedule as per the described priorities.
66	Individual	I am a Trinity resident and am very dissatisfied at the, "no care" policy of looking after these healthy trees!! I have been told we have a half a million pound maintenance to look after the cycle path. Yes, we promote the cyclists, but what about supporting the local residents. These trees used to be maintained by the railway company when the railway line was their. These trees are healthy that I won't disagree with, but they are huge forest trees whose branches over grow into mine and my neighbours gardens. We are lacking from natural daylight as it is without competing with the trees!!! Very very disappointed Trinity resident	The Council has to prioritise the use of its resources and the rational for this has been set out. Common Law rights are also set out. Discussions with Transportation and others will be held to investigate whether funds from the cycling would be available for maintenance.
67	Individual	Apart from blocking out views and light, they are becoming dangerous and I fear they could be blown down causing unthinkable damage to houses, if not killing someone. I would very much appreciate if something could be done about these trees. Chopping them all down for example, and planting new tiny trees which will never grow to the height if these enormous trees there now.	Healthy trees will generally not be removed for light or views as set out in policies 24 & 35. If trees are suspected of being unsafe please contact the Forestry Service who will carry out a safety inspection.
68	Individual	I have read your very comprehensive document on trees in the city and have only one small (probably pedantic) comment which I feel that you should look at and adjust. The total number of trees in the city is 100%. On P13 paragraph 2 of the document it states: Surveyors also noted the condition of each tree assessed. Overall, 71% of Edinburgh's trees were assessed as being in an 'excellent' condition, with 24% in either 'good' or 'fair' condition, and 15% being in 'critical', 'dying' or 'dead' condition. This adds to 110% which is not possible	Correction has been made.
69	New Town and Broughton Community Council	(a) The document is admirably lucid and appears to strike a good balance between the value placed on trees and the risks and problems they may present.	Comment Noted.
70		(b) Re Paragraph 3.3: this states that in granting consent to a development "replacement planting [of trees protected by TPO's or worthy of retention] is required to offset loss to amenity." We would urge adding "subject to any tree valuation model which may have been adopted." (See (c) below).	This is an extract from current planning policy framework guidance. Review of Planning policies is not in scope for this document.
71		(c) Re paragraph 5.1.4: In this Medium Priority is given to "the adoption of a tree valuation model to be applied as a policy to aid decision making around tree removals." We believe that no development should disadvantage a community in the long term and the replacement of trees which a development has necessitated should be on a truly like for like basis. As pointed out in Paragraph 1.2, to provide parity a felled 40 year old tree should be replaced at a ratio of 40:1. In practice this level of replacement rarely if ever takes place and as a result developers are in pocket and communities unfairly short changed. Since the economy currently appears to be picking up with implications for increased development activity we believe it would be more appropriate to give the adoption of a tree valuation model High Priority.	This is an extract from current planning policy framework guidance. Review of Planning policies is not in scope for this document.
72		(d) Re Paragraph 5.2.1: In this we are pleased to see High Priority accorded to "the provision of better information through the web on tree operations and policies that concern trees." To "through the web" we would urge adding " and in widely distributed leaflet form regarding policies governing conservation areas." We are conscious of a high level of ignorance in this respect within the general public and would like to see this information as readily available and in as many forms as possible.	This is an extract from current planning policy framework guidance. Review of Planning policies is not in scope for this document.
73	Individual	Having looked through the above draft proposal I did not appear to have made any provision for the introduction of the new high hedge laws. It is my understanding that this new law will be applicable after April 2014. Surely it would make sense to include the management of trees that form high hedges within the tree management section.	A report on the implications of the High Hedges Act will be brought forward in due course.

74	Edinburgh Airport	We welcome the promotion of tree planting within the City of Edinburgh Council area, this will enhance the environment in and around Edinburgh. We do however seek reference to aerodrome safeguarding to highlight the potential impacts that some trees may have upon the safe operation of the airport. The City of Edinburgh Council are required to consult Edinburgh Airport on planning applications within their local authority boundary that may attract birds within 13 kilometres of the airport. The text within the development plan and supplementary planning guidance includes reference to this requirement. To ensure continuity and to assist in informing parties undertaking planting that is not associated with a planning application the Trees in the City document should also refer to aerodrome safeguarding and in particular Safeguarding of Aerodromes Advice Note 3: Potential Bird Hazards from Amenity Landscaping and Building Design, copy enclosed. Other similar advice is also available at <a href="http://www.aoa.org.uk/operations-safety/">http://www.aoa.org.uk/operations-safety/</a> .	Comments noted. It is understood that consultation on such planning applications is currently made as a matter of course.
75	Individual	Thoughts on 7.6 and 7.7 City draft plan. Whilst I recognise trees on privately owned land should be maintained by the land owners, there are no considerations for the elderly and those who are in a situation of poverty who are expected to maintain their trees. Maybe there is provision in councils for assistance with this. However do not let Edinburgh City Council: ignore the fact that some are unable to maintain their trees, instruct the tree surgeons to drive past a sole tree in their cherry picker or spend stupid amounts of money and time chasing and taking legal action on those struggling in the first place. Assistance or at least recognition should be made for those who are unable to maintain their trees.	The Council currently is unable to assist private owners with liability issues relating to their own trees.
76	Grange / Prestonfield Community Council	GPCC strongly supports in principle the aims of the Action Plan and so these comments are not by way of criticism but are intended to strengthen its aims. Although directed at the management of City of Edinburgh Council (CEC) trees and woodlands the content of the document has a greater reach and we think the statements in Sections 1 & 2 on the benefits and status of trees in the city are particularly useful. GPCC would support any broadening of the content of these Sections you may consider appropriate in order to reach a wider audience. In Section 3 Strategic Context, the useful statements on tree work may need updating to take account of recent changes in notification which is now included in a separate section in weekly planning lists and the finalisation of the Edinburgh Design Guidance means that some content of the earlier supplementary guidelines is now in the new Guidance.	Comments Noted. The support of the Grange & Prestonfield Community Council is welcomed.
77		In relation to development, we would like to see the Forestry Service having a much greater influence in the assessment of planning applications by case officers. We think there may be too-ready an acceptance that a tree needs to be removed because it is "too large" or "diseased" and we think that Section 1.2 of "Trees in the City" supports this view. We would like to know how the Forestry Service could have a greater impact on the Planning Service and in strengthening planning guidance, thereby helping to reduce the loss of valuable trees.	The Council's Forestry Service has responsibility for the management of Council owned trees. The Forestry Service is a consultee on planning applications which affect Council Owned trees and as such will provide comment in line with the policies and good practice.
78		To what extent does the Forestry Service have a comprehensive database on the trees in its care and is it the intention to expand this?	The Council's Forestry Service has records for 55,000 individual trees under its management. The feasibility of making this information accessible to the public is being investigated.
79		In Section 4 on the Draft Tree Management Policies we think some of the supporting information such as that on legal obligations and common law rights are useful summaries of the current position and would benefit perhaps from being given greater emphasis in a separate section of the document.	The Common Law section of the policy to include tree roots has been updated .
80		Likewise we suggest that what to do when a tree becomes dangerous or there is an emergency affecting a tree could be given special emphasis in the document rather than just related to a Policy.	Guidance on the Councils out of hours emergency tree services contained within the document.
81		Many of the tree management issues set out in the document understandably relate to the more common situations such as parkland and highways. However in the GPCC area we have other locations where there are tree management concerns:- Nature Strips – originally unfeued land adjacent to some roads in the Craigmillar Park area originally planted as ornamental gardens, for which CEC assumed responsibility some time ago. Limited resources has led to inadequate maintenance and what to do has become somewhat contentious. Newington Cemetery – we are aware that the Forestry Service carries out tree maintenance as required in this CEC owned cemetery compulsorily purchased some time ago. However we have for some time taken an interest in this valuable "green lung" in an urban setting and within the limitations imposed by it being a cemetery and with a requirement to maintain an emphasis on bio-diversity we would like to see a more pro-active approach and the better provision of information. In both of these locations GPCC and the Craigmillar Park Association are willing to work with the Forestry Service and the other responsible CEC Services to see what can be done to try to improve matters and hopefully we can look forward to a useful collaboration.	Comments Noted. The Council would be pleased to have discussions with GPCC on detailed aspects of the management of the Council trees.
82		We note that the Forestry Service will continue to offer its advice when requested. There are many public bodies in Edinburgh responsible for trees and woodlands, not just CEC, which do not necessarily have the know-how or the public engagement experience of the Forestry Service. We would like see this valuable expertise used to greater benefit and ask that in the consideration of this Action Plan some thought be given as to how this could be given greater publicity and use.	Comments noted
83	Scottish Wildlife Trust	The Scottish Wildlife Trust fully supports the policy proposal to increase the number of street trees- as outlined in policy 38 . Street trees are not only an attractive feature which benefit people and wildlife but they also perform vital ecosystem services such as capturing carbon, slowing surface water movement, improving air quality and attenuating the urban heat island effect. We would very much hope this policy is adopted by the City of Edinburgh Council and we see it as an exemplar project for the Edinburgh Living Landscapes initiative -which is a partnership between Scottish Wildlife Trust and Edinburgh City Council.	Comments Noted.
84	Individual	As a citizen, I have felt for years that some of our streets could so benefit environmentally and aesthetically from street planting, Leith Walk being an example. I hope we shall see many trees planted by the Council in the City streets in the future and encouragement given to other groups to do so too.	Comment Noted.
85	Individual	Instead of cutting down trees every year to make our public Xmas Trees, why not either plant one that can stay permanently in that spot or use trees that are already in place? This happened in Bruntsfield Place several years ago, to great success.	Comment Noted, to be passed to the appropriate section dealing with Christmas decorations.
86	Individual	I wanted to write and express my view regarding trees in the city. I am very much in favour of more trees being planted in areas that are clearly crying out for the benefit of trees. George street would be a magnificent street if the paving was restricted down the centre and trees were planted to create a long avenue of shade and green. Princes Street would also benefit from strategically planted trees along the shop side of the road, providing shade and an aesthetic improvement to the look of the street. I do feel that we can not have enough greenery in our city and would be satisfied to see a large planting of trees throughout the city over the next few years	Comment Noted.

87	Individual	I also notice the amount of work that is carried out below the ground in what had always been green grass areas. This is particularly worrying where the trees, many of which are now large and ageing, as there is often damage to the roots below ground.	Tree Protection in relation to development will be included.
88	Individual	Where I am they are hanging over the garden and also join on top across the street making it very dark.	Comment Noted.
89	Individual	I have no specific comments on the document.	Comment Noted.
90	Individual	Therefore, my comment and request today is to ask for the TPO orders to be more flexible with regard to large mature woodland trees growing inappropriately in small sub-urban gardens.	TPO's are part of planning legislation and are not within scope for review in this document. Amendments have been made to clarify this issue.
91	Woodland Trust Scotland	Yes, Woodland Trust Scotland would commend the Council on their work with this document. In the following response there are a number of additional actions (mainly around the maintenance of existing and especially newly planted trees) which we would recommend that you consider adopting also.	The support of Woodland Trust Scotland is welcomed. Comment Noted.
92		SECTION THREE - Strategy GENERAL - The Tree Protection Charter is referred to a number of times, but no link provided to help people find it.	Link to Tree Protection Charter will be included in text.
93		Page 15 - Although this report explains that the Millennium Woodlands are mostly still present, but it would be good to focus replacement planting on those which have not survived, such as Cairntows Park. This could be done on an ad-hoc basis, but it would be better to have a strategic plan to ensure that the legacy of this recent project is not lost. Obviously this whole action plan should protect trees and woodland, but should there be any additional protection or attention for the remaining Millennium sites, such as Curriemuir End?	Millennium Woods are protected by similar legislation to other woodlands. The Council as landowner occasionally has to balance competing land uses which has resulted in some losses of Millennium woodland.
94		Page 15 - Woodland Trust Scotland would warmly welcome a re-energising of the Tree Warden scheme, and would be happy to work with the Council to promote this amongst our members and volunteers across Edinburgh.	We welcome the Woodland Trust's support.
95		Page 16 - We are sorry to say that the Forestry Commission's "Woods In and Around Towns" programme may be mainstreamed by the Scottish Government's new Scottish Rural Development Programme (SRDP) funding model which was consulted on over this Summer. This loss of ring-fencing would naturally put specific woodland projects - especially in urban areas - at risk of losing out to bigger more rural schemes. Any expressions of support that Edinburgh Council could give this programme towards the Government or Forestry Commission would be greatly appreciated.	Comment Noted.
96		Page 17-19: Opportunities (Woodland expansion, and the creation of new green networks) are vital and we welcome the Council's direction of travel on these, but without any spatial mapping to show existing woodland within this document - or perhaps direct links to the Greenspace Audit's work in the area - it's difficult to illustrate the local situation.	Mapping of existing woodland areas will be published in due course.
97		SECTION 4 - Tree Management Page 45 - 10.2 - Maintenance of newly planted trees Woodland Trust Scotland are keenly aware that one of the most significant factors in the failure of newly trees to survive is poor management, especially in the case where the surrounding grass is cut too close to the tree and mowers bash or strim off the lower bark of the tree. Your policy of 1m diameter of mulch around each tree should help this, but ultimately the best solution to this would be better training for staff engaged in mowing (who may be seasonal)	Tree guards are left on newly planted trees for as long as possible to prevent damage caused during grass cutting operations.
98		We believe that Woodlands should have at least twenty cubic metres of deadwood per hectare to aid biodiversity, which should perhaps be included as one of your policies for existing management. Deadwood should be left intact and not chipped when possible. If chipped it should be used as a mulch on-site to protect establishing trees - thus it only smothers ground flora that you want it to suppress and not valuable habitat.	Policy 10 has been amended accordingly.
99		Also, for new trees, a better specification for tree establishment would be to have low stakes and a wider area fenced off around the tree as an alternative to the three high stakes and high weld mesh that is currently used.	The City of Edinburgh Council has a successful tree planting specification which has proven to provide the best solution for tree establishment within the challenging urban environment of the City.
100		SECTION 5 - Action Plan Page 51 - 1.12 - On the question of resilience and different tree species; for biodiversity we would recommend native trees wherever possible. There are a few interesting alternatives which have been introduced, but the majority of trees should be native or provide good food sources for wildlife. Who can say that any of these recently planted non-natives are going to be more resilient than our native trees that have survived our climate for the last c.8000 years?	Native trees are planted mainly in woodland areas and provide the majority of the city's tree resource. Guidance on climate change advises that except in nature reserves planting of a range of species is advisable to improve resilience.
101		We are aware of the proposal to consider planting around 5000-6000 trees annually as part of a "Plant a Tree for Every Child" scheme within the City and Woodland Trust Scotland would wholeheartedly support it. We help schools and community groups plant thousands of trees every year and would be happy to help Edinburgh Council do the same.	We welcome the Woodland Trust's support.
102		We'd like to see a regular report on the Council's planting and management successes perhaps bi-annually going to the Environment Committee, this would look at plans for new tree planting, the priority list for street planting and health-checks on significant veteran and heritage trees, amongst other things. We also look forward to the consultation period on Tree Management Policies.	Reports are provided to Committee as and when required.
103	Individual	The section on trees in private properties is sparse; there clearly is not a policy regarding how the Council intends to force private householders with "out of control trees" in their properties to do something about them before they get either dangerous or too big to deal with easily.	The scope of the document will be revised clearly setting out the purpose and objectives.
104		Needs more "teeth", particularly regarding how the Council intends to make private properties control large or over-grown trees in the city.	The Council's powers in relation to privately owned trees are set out in the revised document.
105		It is clear to anyone walking around many of the residential areas of Edinburgh that there are too many large and potentially dangerous trees. Although you claim that there is a felling and replacement policy, if large trees are present in "non-public" places the Council gets "cold feet" about doing anything constructive about them, despite the fact that some of those trees may be obstructing street lights or overhanging roadways with the potential that branches may fall onto the road or vehicles on the road. If it can be seen easily that trees are overhanging roads or other facilities (street lights) in a dangerous or obstructive way then, regardless of who owns the trees and whether or not they are growing in private property, the dangerous or obstructive branches or foliage should be removed regardless of any resistance or appeals from the owners of the trees concerned.	The Council's powers in relation to privately owned trees are set out in the revised document. Council trees are subject to a proactive inspection and works regime that provides an appropriate degree of safety.
106		As far as they go. Large trees causing obstructions, daylight or streetlight blocking or clearly dangerous (i.e. likely to lose branches or fall in inclement weather) should be dealt with as priority whether they be in public or private locations.	The document sets out the rationale for the prioritisation of works to Council owned trees.
107		The policies are too "reasonable" - if the Council is serious about getting a balance of suitable trees in the city then it needs to get tougher in dealing with large trees.	Comment Noted.
108		Not tough enough!	Comment Noted.

109		We in Edinburgh are extremely lucky in the amount of Greenspace and vegetation that we have throughout the city and nobody would suggest losing these. However, there are many large trees that are over- grown and potentially dangerous - we had this extremely well-demonstrated in 2012-13 in the times of high winds. It would seem that we can expect more gales in the future and therefore priority should be given to dealing with over-grown and potentially dangerous trees in the city. It is a fact that many such large trees are growing in private properties where owners seem to take little responsibility for ensuring that the trees are safe and of reasonable size. The Council really has got to deal with this situation; the public places are well looked after but the Council has simply got to "grasp the nettle" of large trees in private ownership.	The Council's powers in relation to privately owned trees are set out in the revised document. Council trees are subject to a proactive inspection and works regime that provides an appropriate degree of safety.
110	Individual	Far too long winded with too much emphasis on environmental issues over actual practical concerns, it seems the council's policy is to emphasize its green credentials over the concerns of residents.	Comment Noted.
111		It would appear the Council is only prepared to deal with safety related issues rather than the concerns raised by householders. This was made abundantly clear on page 38 section 8 entitled 'Common Tree related issues'. This section listed quite clearly the complaints that have been raised about Council owned trees causing a nuisance to householders which unless a safety matter is involved there is nothing the Council is prepared to do about it.	The long term management of trees is set out in the context of available resources and the Health & Safety approach to management. Amenity issues relating to trees will be addressed when resource become available within the context of the
112		There is nothing in the document which states that the council is required to seriously consult the resident and consider their views on the planting of new trees alongside their private property. This could prevent future problems concerning views from houses and the blocking of light into gardens.	Consultation will take place with residents where trees are planted affecting domestic homes via local Neighbourhood teams or the appropriate project department.
113		As has already been stated the policies appear to only address safety and environmental issues rather than residents concerns.	The long term management of trees is set out in the context of available resources and the Health & Safety approach to management. Amenity issues relating to trees will be addressed when resource become available within the context of the
114		Obviously safety must come first but it should not be the only thing that is considered as tree related injuries are as far as i am aware incredibly rare compared to complaints about overgrown trees and light/view issues.	available resources and the Health & Safety approach to management. Amenity issues relating to trees will be addressed when resource become available within the context of the council policy's on tree management set out in this document..
115		I have no idea where the research is to suggest that 'The presence of trees encourages people to exercise' pg7.	Although not all reference are provided in the document for the sake of brevity, this work is referenced in the work "The case for Trees" published by Forestry Commission England.
116		There is no mention in this document of the 'High Hedges (Scotland) Bill' which came into force earlier this year which includes both evergreen hedges and those consisting of deciduous plants which shed their leaves. It would be interesting to know how this bill relates to the problems concerning Council owned trees.	The High Hedges bill is not yet in force. A report to Council will be made in due course.
117	Individual	The document contains no summary.	A summary document is to be produced.
118		The document is not written in plain English but is instead riddled with virtually unintelligible jargon e.g. They provide sensory stimulation, visual relief and aesthetic pleasure "Some caution should be taken when using the carbon sequestration data for predicting future value as i-Tree only provides a single estimation of net incremental value."	Comment Noted.
119		One would probably need to be an expert in the field to assess the factual accuracy of the document	Comment Noted.
120		The document is not presented in a balanced way and make no detailed reference to the broader aims of the council other than in the forestry and woodland context.	been added.
121		In the introduction the document is wholly biased towards the benefits of trees. Approximately 7/8 of section 1 is devoted to the benefits of trees and 1/8 to the problems associated with them. Despite this a large proportion of the document is devoted to the "policies" to "manage" the problems associated with trees. It appears likely that these policies will be applied by officers in a dictatorial fashion.	It is considered that the benefits of trees are adequately dealt with in section 1 and the problems posed by trees are comprehensively dealt with in the policy section.
122		The policies should be set against broader Council objectives and should take into consideration cityscape and landscape issues, amenity and nuisance issues and ensure that the views of directly affected residents and affected owner are taken into account before individual decisions on the management of trees or wooded areas are taken	The policies set out in the document have been created to safeguard the public amenity of trees for citizens of Edinburgh. Individual tree issues are as stated dealt with on an individual basis in the context of available resource and Council policy.
123		The policies are clear and detailed.	Comment Noted.
124		Direct public consultation with directly affected residents and property owners. It is not sufficient simply to "Provide better information through the web on tree operations and policies that concern trees and woodlands"	Individual tree related enquires are responded to on an individual basis when received by the Council.
125		Before taking any decisions the Council should seek out the views of directly affected residents and property owners.	The Council seeks to consult with communities but is unable to consult on every aspect of every operational issue. Actions are proposed to achieve improvements in this area.
126		The Council should compare the effectiveness of woodland and forest areas in reducing CO2 levels with other areas in its responsibilities such as transport and land use .	Transport and land use generally is not within the scope of this document.
127		The Council should consider its policies on woodland and forest areas with reference to its policies on cityscape and landscape	Comment Noted. Internal consultation has taken place.
128	Individual	Seems to ignore hedges completely. All over Edinburgh there are problems with hedges which are too high and/or grow too far over pavements	The High Hedges bill is not yet in force. A report to Council will be made in due course.
129		Whole document is totally biased "trees = good: pruning/felling = bad"	Comment Noted. The rational for work prioritisation is explained in detail.

130		See previous answer regarding bias in document. I am not anti-tree but if a tree is causing pavements to break up, taking light away from houses etc it is not acceptable for residents to have to continue to put up with this.	Comments noted. These issues are covered by policy and the rationale is explained.
131		Hedges. The Council should set up a facility where residents can report hedges which are too high or overhanging the pavement. If the owners of these hedges do not cut them back, the Council should do this and bill the house owner.	The High Hedges bill is not yet in force. A report to Council will be made in due course.
132	Individual	Very long winded	Comment Noted.
133		Nobody pays any attention to issues raised by my local Councillor on my behalf regarding overhanging branches at the front and back of my property and a diseased tree on the walk way. Planning permission obviously given for removal of several trees in small housing development near by.	Common Law rights are fully explained in the document along with the rationale for work prioritisation.
134		Our property both back and front is surrounded by the Council Trees, come September we spend many hours gathering your leaves and disposing off them, last year you said we would have another brown bin delivered for said disposal WHERE IS THE BROWN BIN as we have now started to collect your leaves. Maybe you would like us to return them to your property?	This request has been passed on to the appropriate section.
135	Individual	Could be better and some of the policies bits seem repetitive.	Comment Noted.
136		Resilience to climate change is not increased by introducing more exotic species. We do not know the future of our climate and our native trees have endured changes in our climate during the past. Native species are generally going to be of much greater benefit to biodiversity so we should be using more of them.	Native trees are planted mainly in woodland areas and provide the majority of the city's tree resource. Guidance on climate change advises that except in nature reserves planting of a range of species is advisable to improve resilience.
137		There needs to be more action points to make changes to current management practices and to say how these practices will be improved. Would like to see better specifications included for individual tree planting maintenance so that grass cutters do not continue to damage and kill all of our trees.	The City of Edinburgh Council has a successful tree planting specification which has proven to provide the best solution for tree establishment within the challenging urban environment of the City.
138		Yes there needs to be a balance, but there also needs to be much greater thought put into planning space for nature and trees within the planning system - planting trees 2m from a new house or building is never going to work in the long-term.	Review of Planning policies is not in scope for this document. Comments have been passed on to Planning.
139		Missing policy: "The Council will not kill trees by neglect and mis-management." Missing policy: "Woodlands should have at least twenty cubic metres of deadwood per hectare for biodiversity". Missing policy: "management of LBS sites should prioritise biodiversity as an objective". Missing in the work plan and priorities : There is NO training for people who are employed seasonally to cut grass so that they do not damage trees.	Policy 10 has been amended accordingly.
140		No maps of existing woodland or where a new woodland could be sited. Similar issue for linkages between woods.	Mapping of existing woodland areas will be published in due course.
141		The Millennium Woodlands – document says most are still present, but no all are and many have lost bits over time without any replacement planting. What protection is there for remaining sites, e.g. Curriemuir End; and what plans to replant lost bits of woodlands e.g. Cairntows Park.	Millennium Woods are protected by similar legislation to other woodlands. The Council as landowner occasionally has to balance competing land uses which has resulted in some losses of Millennium woodland.
142		A better specification for tree establishment would be to have low stakes and a wider area fenced off around the tree as alternative to the three high stakes and high weld mesh that is currently used.	The City of Edinburgh Council has a successful tree planting specification which has proven to provide the best solution for tree establishment within the challenging urban environment of the City.
143		Resilience? For biodiversity we want native trees where possible. The majority of trees should be native or provide good food sources for wildlife. Who can say that any of these recently planted non-natives are going to be more resilient than our native trees that have survived our climate for the last c.8000 years?	Native trees are planted mainly in woodland areas and provide the majority of the city's tree resource. Guidance on climate change advises that except in nature reserves planting of a range of species is advisable to improve resilience.
144		Number one priority is to stop the killing of trees by grass cutters. Staff should be trained. Wildflower mixes that do not need cutting should be used under trees.	Tree guards are left on newly planted trees for as long as possible to protect them during grass cutting operations. Any trees damaged during cutting are reported so that this issue can
145	Individual	Easy to read and follow. Well laid out.	Comment Noted.
146		Section 8.3 - right to light - I don't think this is strictly correct. I do think people should and do have the right to some degree of light in their property. When it is overshadowed by neighbouring trees there should be a more detailed approach on how decisions can be agreed.	It s belived that the position in relation to right to light in relation to trees has been accurately reported.
147		Almost - Health and Safety generally should be given a much higher priority than your document covers	The rationale and policy regarding tree safety reflect the current national guidance "Common Sense Risk Management of Trees"
148		Given some of my previous comments I feel the document very much understates the risks that managed/unmanaged trees present. It makes no mention, for example, of the dangers of subsidence caused by tree roots, and how these can be prevented/managed.	Clarification on subsidence in Edinburgh has been included.
149		Despite some disagreement about the facts omitted, I do think the document is extremely well presented with the policies that are included well written.	Comment Noted.
150		In the main, yes, they are reasonable but very much weighted towards what the council won't do rather than will!! This is the main reason I didn't say "yes" to this question!!	Comment Noted.
151	Individual	As I said previously, I'd like to see more procedures written on what the council will do when presented by someone with a "right to light" question. I'd also like due cognisance given to trees that are over large and have huge tree roots, particularly within the vicinity of buildings. A detailed appeals process here would be helpful.	Right to light is addressed in policy 26. Trees that are high are addressed in policy 24.Appeals can be raised with an elected member or an official or through the Council's complaints process.

152		The actions very much state what the Council won't do rather than what it will. They omit several areas I've covered already - right to light, tree root damage and subsidence being three, for example.	Comments Noted.
153		I am certainly not against trees and very much agree with the bulk of your supporting statements in the early part of the document. I'd like more detail on how residents can appeal decisions and what the Council will do.	Appeals can be raised with an elected member or an official or through the Council's complaints process.
154		I certainly feel the matter of Health and Safety, of trees and the surrounding infrastructure, needs a much higher priority with much more detail.	The rationale and policy regarding tree safety reflect the current national guidance "Common Sense Risk Management of Trees"
155		Yes, I'd like to see a section on the removal of a tree if the roots are in danger of causing damage/subsidence to nearby buildings. I'd like it clarified that any such fees caused by this removal will be met by the owner on whose land the tree resides.	Clarification on subsidence in Edinburgh has been included. The common law section of the policy has been amended to include tree roots.
156		I'd like to thank the Council for preparing this document and clarifying a number of matters. I may have disagreements with certain facts and omissions but on the whole it's a well prepared report.	Comment Noted.
157	Lothian & Borders Badger Group	Very clearly set out and expressed but tables in Landscape format are hard to read unless printed out.	Comment Noted.
158		On the whole but Policy 10. 1) In woodlands e.g. Corstorphine Hill chipping is unnecessary and harmful to biodiversity. To several species of bird -e.g. woodpeckers and animals -badgers- the invertebrates in decaying logs are an extremely important food resource. The removal of almost all logs and the chipping of the remaining wood in the current management plan is resulting in a noticeable decline in this feeding resource. 2) Wherever possible suitable trees should be cut to leave a very tall stumps for the benefit of hole nesting birds and, again, as a invertebrate breeding post.	Policy 10 has been amended accordingly.
159		Himalayan Balsam, an invasive species, was introduced to Corstorphine hill by forestry vehicles during the first year of the implementation of the Management Plan (the first H B plants were seen at the place used for storing logs prior to their removal.) A policy is required to ensure contractors' vehicles do not introduce such species or diseases by holding contractors liable for 3 years after they have worked on CEC land. They should be responsible for removing invasive species that can be attributed to their lack of bio security.	Comment Noted. A specific policy on invasive species introduction is not within scope of this document. Invasive species continue to be a matter of concern and covered in Edinburgh's Biodiversity Action Plan (EBAP), and in site-specific management plans.
160	Individual	It is clear that it is a policy to do relatively little except plant more trees and explain why no action will be taken over problem trees.	Comment Noted.
161		It is extreme in its view of trees. One paragraph on the negative side and spurious claims on exercise, cancer and recovery on the positive. Even wood by-product from felling of trees is a positive but felling trees is also a negative because it takes time to replant. Can you have it both ways?	Comments noted. The document seeks to achieve a balance between risks and benefits.
162		There is no balance	Comment Noted.
163		Dealing with unsafe trees on private land affecting private houses.	The scope of the document will be revised clearly setting out the purpose and objectives.
164		I believe that it should start at both ends of the issue. That way you halve the challenge	Comment Noted.
165		The preamble is excessive. The policy should be able to stand alone	Comment Noted.
166	Individual	A large number of city trees are being strangled by ivy. Perhaps some effort could be made to address this issue.	Clarification on Ivy will be included.
167	Individual	I am delighted that the benefit of trees in absorbing pollution and screening is fully recognised in this document. Too many people are more concerned with the negative aspects when trees abut their property such as limiting light and forget about the very real benefits for all the community.	Comment Noted.
168		I am particularly delighted that the value of older trees and the benefits of creating corridors of nature within our city. It is a delight that the former inner city rail lines are lined with beautiful old trees.	Comment Noted.
169	Individual	There are too many spelling errors!	Corrections will be made.
170		Hedges, shrubs and trees restricting width or height of pavements.	This is a tree management policy document only and is not applicable to shrubs or hedges. Encroachment of trees is covered in Policies 15 - 18
171		Trees' should include shrubs and hedges	This is a tree management policy document only and is not applicable to shrubs or hedges.
172		I think that removal of trees should be less difficult to achieve.	Permission for removal of trees is covered by statutory law.
173	Trustees of Newhaven Park	A policy concerning the statutory obligation of the Council to the maintenance of trees, and potential legal liability to the Council of branches falling off trees, located in parks where children of Council run schools use the parks for games and outdoor activities as part of the schools teaching programmes and activities.	The statutory obligation of the council is included within this document.
174		Priorities should be given to trees where there is a potential safety risk, and a potential legal liability to the Council, of parks and trees which are in a condition where they could be of potential damage to a child or children playing in a park, or taking school outdoor activities or sports in a Council maintained park, or a member of the public.	The rationale and policy regarding tree safety reflect the current national guidance "Common Sense Risk Management of Trees"
175		Prioritisation of tree maintenance mentioned in 11 above.	Comment Noted.
176	Individual	concise, informative and well laid out	Comment Noted.
177		a before; the required information is well presented.	Comment Noted.
178		there should be no dubiety regarding the Councils attitude and intentions now.	Comment Noted.
179		the 'problems' of trees is often the focus. the 'value' of trees is often unconsidered or inaccurately presented - in my opinion.	Comment Noted.
180	Friends of Braidburn Valley Park	1) In the introduction (section 1.1) 'providing shelter in winter' would be better expressed as diffusing or breaking up strong winds	Comment noted.



181		2) In section 1.2 references for CAVAT and in section 1.3 references on the research into the benefits of trees should be cited.	Reference to be included.
182		3) The footer on page 6 has references but it is not clear what these refer to.	These form part of section 1.3 The Benefits of Trees.
183		4) Page 7 - Tempering the effects of severe weather no mention is made of the beneficial effect of trees in winter in protecting buildings from enhanced cooling by wind	Comment Noted.
184		5) p11 - The Helliwell and i-Tree-Eco methods. A reference for these would be useful	Reference to be included.
185		6) p14 - When discussing risks of potential pests and diseases no mention of Chalara is made	Comment Noted.
186		7) p35 section 7.2. Please include details somewhere in the document on the criteria and method used to assess tree value.	Reference to be included.
187		8) 7.8 '...overgrown trees and untidy areas can encourage criminal activity' Comments like this should not be made without evidence which should be cited.	Comment Noted. It is accepted that unmanaged urban environments including tree covered areas are more likely to attract antisocial behaviour.
188		1) 1.1 Trees store Carbon not CO2	Comment Noted.
189		2) p22. The term TPO is used but not explained until p24	Comment Noted. A glossary will be included.
190		3) p31. There is a reference to section 6.7 but this does not exist	Correction will be made. Comment Noted.
191		I would like to see more emphasis on the value of trees. Although they obviously present problems and risks in some circumstances, trees are now often seen as disposable and replaceable assets. The City of Edinburgh council should have policies in place to discourage this approach to trees in the city.	This document sets out the Councils approach to managing and enhancing the city's tree resource.
192		p22. Details of the policies relating to trees in the existing Edinburgh City Local plan and the Rural West Edinburgh Local plan are detailed but it is not clear if these will be transferred across to the new Edinburgh Local Development plan. This needs to be clarified.	The scope of the document will be revised clearly setting out the purpose and objectives. Review of Planning policies is not within the scope of this document.
193		p34. Policy 9. Please clarify if this also applies to contractors working on council owned or managed land.	Clarification included.
194		p49. Policy 38. This need to be quantified to be meaningful and measurable.	Detailed targets will be established in due course.
195		I would like to see stronger policies around Trees and Development (p23). The existing wording appears very weak. Developments - especially large scale ones - provide excellent opportunities to increase tree cover in public areas but this will not happen unless the council insists on this as part of the planning process and can advise on suitable planting regimes.	The scope of the document will be revised clearly setting out the purpose and objectives.
196		Section 10. Tree planting. I would suggest that a community initiative is launched to suggest sites for new tree planting. This would help to broaden planting from Parks etc. and give communities ownership of the tree planting initiatives thus hopefully reducing vandalism to newly planted trees. Input from locals on types and sizes of trees is important to good relations between the council and communities	Tree planting design work is currently carried out by the Council's Forestry Service in consultation with Neighbourhood offices and friends groups. The proposed "tree for Every Child" will present opportunities for wider community engagement.
197		A commitment to replace street trees that have been removed in the last few years due to development or tram works.	A programme of tree replacement in relation to the Tram construction work has already been agreed and forms part of the Tram Project.
198		Section 10. Tree planting The document details some good practice but in reality this is not always followed. In Braidburn Valley Park we have been fortunate to have had a significant number of specimen trees (extra heavy standards) planted over the last few years. Unfortunately a significant proportion have failed or are in poor health. I am sure this is partly due to extreme weather (very wet summers followed by an exceptionally dry summer) and although watering pipes were installed these were not utilised in the very dry weather.	Comment Noted.
199		(section 10.2) I am also concerned at the practice of not removing the burlap from the root balls when planting trees. I am aware there are differing view on this but the generally accepted view appears to be that this material should be removed from the top and sides of the root ball. This material will impede root penetration into the surrounding soil and thus delay establishment of the trees. I suspect this is why several of the trees in Braidburn Valley Park have failed this summer in the dry conditions.	The planting of trees is carried out according to the nursery recommendations and applicable British Standards where appropriate.
200	Trinity Community Council	But it is very long-winded and at 54 pages not easy to extract the salient points. A shorter, more focussed version would be helpful.	Comment Noted.
201	Individual	Standing dead wood should be retained where possible to do so, due its high value for biodiversity. Leaves should not be routinely removed from shrub borders etc as they compost naturally in situ providing a good mulch and habitat for biodiversity.	Policy 10 has been amended accordingly.
202		But there are too many of them and many are simply a statement of the obvious.	Comment Noted.
203		Yes, the policies are reasonable in themselves but there is a real danger that this document will simply lie in a drawer. The real issue is enforcement of the policies. It is clear to TCC that in many instances developers and others simply ignore tree policies and there are insufficient CEC officials to keep an eye on what is happening. Too often trees are irreparably damaged by developers and by the time it comes to the attention of officials it is too late. For example, a number of trees have been damaged by the sheer carelessness or worse of the developers at St Columba's Hospice site in Boswall Road.	The scope of the document will be revised clearly setting out the purpose and objectives.
204		But a number of them are very vague. More specific targets are required.	Comment Noted.
205	Individual	Policy 7 is not realistic. Currently the standard is to tell customers an inspection will take place between 8-10 weeks which can still be difficult to meet with current resources and workloads. Why now suddenly is there a 10 day deadline? It seems that the service is being set up to fail, and will most likely lead to many disgruntled customers and a series of complaints.	Policy 7 will be clarified. The Council's Forestry Service is currently working towards a 10 day response target which is considered achievable.
206		Overall this document is well-meaning but has rather the flavour of 'we have to have a tree plan so here it is'. The real key will be ensuring that the numerous policies are properly carried out and enforced. While it is clear that there are limited resources, more use should be made of members of the public to alert officials to potential damage to trees, particularly by developers.	Comment Noted.

207	Individual	Where the council has planted trees which produce edible fruit or nuts, there should be a policy regarding who is allowed (or not) to pick/eat/use the fruit.	The ownership of fruit produced by Council trees is covered under Common Law. Fruit may be made available to community groups by arrangement.
208	Individual	If this is adhered to yes	Comment Noted.
209	Individual	The document is clear but it should be taken as a very real indictment of the plans that the Council made to introduce the trams to the city when this plan entailed the felling of 3,321 mature trees in the city. This is a scandal and most shameful action against which the planting of new trees can never be a satisfactory answer. As the document makes abundantly clear at paragraph 1.2 trees that are mature have a far greater value to the city and the community than new trees which may take some 30-50 years for their value to increase naturally. The Council has timed this report so that nothing can be done about their tram tree felling and this is a total disgrace.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
210		No factual errors, but the timing of this survey shows the Council to be devious and underhand.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
211		Everything that is said is good, but what a tragedy for the city that no one thought of the value of trees in the city before the mass carnage of 3,321 trees took place to make way for the unwanted and deeply unpopular tram.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
212		It is a pity that the Council did not consider this aspect before attacking all the mature trees for the tram project. Why were trees cut down in Leith Walk when the tram is not now going there? Presumably because the Council wanted to get all the 'bad news' over at the one time in the hope that people would forget?	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
213		The policies are clear but it is a pity that the Council did not follow them when considering the tram project. It seems as though the Council decided to produce this policy document after they had already devastated the tree population in the city.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
214		Yes, the policies are clear but they are far too late to stop the wanton destruction of so many of the mature and most valuable trees in the city. A total, so we are informed, of 3,321 trees needlessly felled.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
215		There is no mention whatsoever of the trees that have already been felled for the tram project - why is this? Is the Council pretending it did not happen? Why were environmental matters not considered? Why was the environmental value of all these mature trees not properly considered? Promising to plant new trees is not an acceptable answer and refutes the logic so clearly spelled out in your own document. It appears that the tram planners have been allowed to get away with an environmental holocaust of the Edinburgh tree stock. It is nothing short of a national disgrace.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
216		The proposed actions are appropriate but too late to save the 3,321 trees that have been felled.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
217		The priorities are generally satisfactory but tend to give too much leeway to planners. If stricter controls had been in force the slaughter of 3,321 trees unnecessarily for the tram project might have been avoided.	Comment Noted. The Tram project was delivered under statutory planning regulation and therefore falls outside the remit of this policy document.
218		Lip service is constantly paid to environmental considerations when major projects are considered by the Council. Much more note needs to be taken of the environmental aspect. Trees make a city much more pleasant and welcoming, so they must not be ignored as has so frequently been the case in the past - the tram project is the most recent example where 3,321 mature trees were felled.	Comment Noted.
219		The timing of the issue of the document has obviously been carefully programmed to come after the Council destroyed a massive number of mature trees in order to 'create space' for the trams. This is a devious and underhand approach and is utterly shameful on the part of the Council and particularly the Council officials associated with the tram and this policy.	Comment Noted.
220	Individual	There seems to be little about new development. For example what sort of tree planting is required in the redeveloped Fountain Brewery site between Fountainbridge/ Dundee Street and the canal? So far there's little evidence of the CEC placing any effective constraints on the development of this very large site which needs significant green spaces and trees particularly along the boundary with the canal. Past experience doesn't give one much confidence that trees will ever be given priority over developers' profits. For example when the EICC extension in Morrison Street was developed the building was brought right to front of the site, displacing half a dozen semi mature lime trees. Only when the local Community Council complained about this aspect of the plan was anything done and then only to the extent of planting replacement trees in large tubs.	The scope of the document will be revised clearly setting out the purpose and objectives.
221		Effective constraints on developers. It's all very well having TPO's and fining developers/construction companies for breaching them but they can just factor in the cost of the fines into their costings. Such breaches should be punished by disqualification from subsequent development for a significant time period.	The scope of the document will be revised clearly setting out the purpose and objectives.
222	Individual	It is too long for reading on-line. For many interested individuals it is too large and expensive to print out. It needs to be condensed and some sections should be separately linked to since individuals are likely to be commenting only on parts of the document which raises issues relevant to themselves.	Comment Noted.
223	Individual	? consider comments relating to protection of "tree using" species that are also classed as protected species e.g. bats	Protected species are covered by statutes and actions are contained in Edinburgh's Biodiversity Action Plan (EBAP).
224		Consider protected species and the protection of habitat	Protected species are covered by statutes and actions are contained in Edinburgh's Biodiversity Action Plan (EBAP).
225	Currie Community Council	The policies are clearly and concisely explained and reasons given.	Comment Noted.
226		A sensible and pragmatic discussion, showing awareness of a very wide range of relevant factors.	Comment Noted.

227		Yes. There is an understandable bias towards not promising council expenditure (e.g. removing/lopping trees causing a nuisance).	Comment Noted.
228		Removing/cutting back self-sown trees blocking a public view, e.g. across the Water of Leith towards Currie Kirk.	Comment Noted.
229		The document shows that the 'sense of wellbeing' generated by proximity to trees is acknowledged. This is possibly the main reason people are well disposed towards trees; positive benefits such as those so well summarised (biodiversity, air pollution control etc) are recognised by most people but engage their emotions less. The desirability but difficulty, of promoting trees along streets is well discussed. This is an excellent, well written and well argued document which definitely contributes to raising the standard of debate of Council policies. Well done!	Comment Noted. The support of Currie Community Council is welcomed.
230	Individual	Maybe I missed it, but is there a policy for providing advice and services for privately owned trees? Aren't there many trees on privately owned land which would benefit from the Council's sympathetic and protective approach towards trees?	The rights of householders under common law have been set out. The scope of the document has been revised clearly setting out the purpose and objectives.
231	Individual	As a public education issue, there should be a wider identification of trees so the tree species become better known. For instance, could some trees in well used Parks e.g. the Meadows have labels on them like in the Botanic Gardens - these seem to be present when the tree is planted but soon disappear. Another approach could be to allow the public to look at a database of trees linked to their geographic position - if people knew more about trees, they might value them more! A further Policy could be 'Label examples of trees in appropriate locations so that the public become more familiar with tree species'	There are no current plans to label trees. This will be considered for future tree planting if resources become available.
232		In our most important Parks e.g. the Meadows, there should be a Policy to replace every mature tree cut down with two of the same kind rather than the haphazard tree replanting policy that seems to occur. I write as the Founding Chairman of the Friends of the Meadows and it seems to me that tree replanting on the Meadows is over influenced but how much money is left in the Neighbourhood Partnership at the end of the Financial Year More effort should also be used to encourage memorial trees even with all the attendant problems when they have to be cut down	It is not possible to replace every tree lost with two. There is historic landscape designs and limited planting spaces to be taken into consideration. Tree planting design work is carried out by the Forestry Service in consultation with the City Neighbourhood offices and friends groups. Available resources will always be taken in to consideration when planning a planting programme.
233	Individual	Not factual errors, but I have already sent some minor queries and suggestions.	Comment Noted.
234		I have commented already on one point that seems odd: that trees are not pruned if they constitute a threat to telephone wires etc. Is this a mistake?	Section on Telephone Wires will be clarified.
235		Possibly there needs to be a clear policy about replanting trees that are blown down or die. Also about propping up young trees that have been bent by the wind.	Tree planting design work is carried out by the Forestry Service in consultation with the City Neighbourhood offices and friends groups. Available resources will always be taken in to consideration when planning a planting programme.
236	Individual	But a reduced version for public with key points would be useful.	Summary to be included.
237		I acknowledge the risks of trees, but is it actually about the vision the people and the City Council have for Edinburgh. For instance, I would not fancy having a 20 feet high oak tree in front of my window, but a thing apple tree that does not grow so much and does not have leaves in the winter is perfect and helps to reduce pollution in Edinburgh streets like Leith walk. It is all about priorities. Utilities need to be embedded in planning and design and resurfacing of streets and their work and mess needs to be checked in terms of quality and damage to the public realm. The damage they cause needs to be repaired using public money. They should be accountable for what	Comments noted.
238		with some exceptions in my view as previously commented on	Comment Noted.
239		Trees are different sizes, some of them grow, some don't. It is possible to plant trees in street that don't block views or overgrow. Utilities work need to be monitored and responsible for the damage they do. We pay high bills for them and they have the responsibility to improve the public realm, instead of making it worse.	It is intended that new tree planting is based on the "right tree in the right place" principle which should alleviate some of the issues currently posed by the cities trees in the future. If damage is caused to trees by utility companies compensation may be sought by the council.
240		I feel replanting trees in urban areas rather than creating woodlands should be first priority in a city with high levels of pollution in streets where public buses run.	Tree planting is carried out when sites and resources for new trees become available. Actions to increase the number of street trees have been identified.
241		Great initiative the survey. well done	Comment Noted.
242	Individual	I would like trees planted next to walkways not to have shallow roots because they do tend to make the pavement uneven and difficult to traverse with a disability	Comment Noted.
243	Individual	There is no advice for 'Tree touching building' other than a Council tree. I have had to rebuild my listed garden wall twice because a privately owned tree in a shared garden beyond the wall has pushed it over. This raises several questions: In a conservation area (CA) why should a self-seeded tree that is growing right out of a listed wall and causing it chronic damage have any sort of protection? Please define 'tree'. Previously I was given a set of dimensions and told any tree fatter or taller was protected in a CA. Is this still the case? While there is no functioning Statutory Notice scheme other than for emergencies, what help is there for anyone wishing to fell a tree in a shared garden? I have had to pay full costs for a tree not on my land to be felled (with planning permission!) so that it wont push the wall over again. Please provide advice to people with shared gardens in CAs to stop them planting trees that will later grow too big, and to encourage them to weed out sycamore seedlings before they reach protection status.	The scope of the document will be revised clearly setting out the purpose and objectives. Common Law rights are more clearly explained in the revised document.
244		See 6. Please consider buildings too, listed or otherwise.	Comment Noted.
245	Individual	I have read much of the Document but not all. It is rather long for most people to plough through.	Comment Noted.
246		Many trees are lost, I understand, through new building sites. If there are not enough visits from Council Tree Planning Officers (perhaps there are not enough such officers?) at crucial times, particularly during demolition, proper care as per Council guidelines is often not adhered to e.g., underground roots are ridden over and a tree dies later or trees are damaged and have to be taken down. I understand that some demolition firms are paid according to time, which would not encourage care.	The scope of the document will be revised clearly setting out the purpose and objectives.
247		although naturally quite technical in parts.	Comment Noted.

248		but I should like to see much more street planting.	Comment Noted.
249		Apparently Edinburgh has less street trees than some cities. Please can we have lots more. The document sounds well thought out but will surely require various Council departments to work together to achieve its ends.	Tree planting is carried out when sites and resources for new trees become available. Actions to increase the number of street trees have been identified.
250	Individual	You took over 50 pages to explain what was summarised in less than 2 pages.	Comment Noted.
251		The document is written in a fashion which allows the Council to evade or minimise its duties as a 'responsible landowner' with all the burdens that that entails e.g. care of plants' within its curtilages, and their effect on the amenity of others. Examples are Policies 22, 34, and 35 which are written like 'get out' clauses.	The document sets out the Councils duty of care in relation to its trees and describes the rationale for prioritising the resources available to deal with tree-related issues.
252		The Council should pay more attention to the needs of other, when trees become a nuisance or hazard, or affect amenity and enjoyment of other persons private property.	Comment Noted.
253		The Council should have already had a robust and workable set of protocols in place already to deal with management of all types of trees within the City.	Comment Noted.
254	Individual	Edinburgh's tree scape is vital to the overall appeal of the city it is essential that replanting and redesign is considered as part of any planning application	The scope of the document will be revised clearly setting out the purpose and objectives.
255	Individual	I think that the Tree Management Policies section is particularly helpful, as it clearly sets out what action CEC will/ won't take in response to a wide range of situations.	Comment Noted.
256		The only policy I am unsure about is 8.11 - Drains and Invasive Roots. The policy states that the Council will not prune, cut, etc the roots of a Council owned tree to prevent them from entering a broken or damaged drain. Will the Council cut back the roots prior to the drain being repaired, or is this for the property owner to do? Also, if there is a TPO on the tree, will this mean that there could be difficulties in repairing the drain? Some clarification on these points would be helpful.	The Common Law section of the document has been amended to include tree roots.
257		I would like more clarity/guidance on the rights of individuals who wish to plant & look after trees on council land or derelict land; risks of prosecution, fines etc.	Permission of the landowner would be required. Advice can be sought via the Council's Forestry Service regarding Council owned land.
258		I live in a housing estate in Wester Hailes with large swathes of grass, or even worse tarmac. The few trees around here have metal cages around their trunks that they are getting too large for. I would like to know if - a. your plans include such areas b. who is responsible for the care of these trees	The Council's Forestry Service is responsible for the management of Council trees. Any issues relating to tree management can be directed to the Forestry Service.
259	Individual	The problem is in the implementation of policy e.g. Planning Policy Env12 on Trees can be ignored by planners and developers - by saying the effect of removal is negligible - a catch phrase for allowing trees to be removed e.g. removed for unnecessary garages recently in an application in a Conservation Area.	The scope of the document will be revised clearly setting out the purpose and objectives.
260		The problem is how to implement them successfully - you need more interaction with the planning dept.	Comment Noted.
261		Probably especially as the climatic conditions are so uncertain. Also planning policy needs to be strengthened to ensure developers put in suitable trees in suitable places - the Forestry Dept needs an input as they have to deal with the consequences of bad decisions albeit in many years time	Comments Noted.
262		More effort is required to ensure good maintenance which is a major problem - in particular maintenance of newly planted stock. This summer has seen scores of fine beautifully planted young trees die from lack of water. Trees can often be seen with constricting tree ties that should have been removed years ago! Most important to choose suitable tree for the location - the effect in 50 and 100 years time needs to be imagined - this is not an easy matter and more thought is needed into varieties chosen. Agree with the need for variety and it is very important that the recent emphasis on native species while seeming to be sensible is now seen to be too restrictive. The emphasis on Ash for woodlands to the exclusion of species like beech can now be seen as disaster - it has accelerated the ash disease that is likely to wipe out most ash within 10 years - the millennium planting across the UK could be seen as a unforeseen disaster. I blame the Forestry Commission and other experts for not being alert to what was happening on the Continent.	A watering programme is put in place for newly planted trees if dry conditions prevail but this is not a guarantee that young trees will not die. The Council has tree planting specification which has proven to be a reliable method of establishing trees in a very challenging environment. All new tree planting is based on the "right tree in the right place" principle which should alleviate some of the issues currently posed by the cities trees in the future.
263		Yes. On the whole - but even more emphasis on maintenance of new stock is necessary. We need more street trees of a medium size - large trees are often unsuitable for city streets (however much carbon they may capture). More emphasis should be given to the aesthetic experience of trees and the varieties also chosen for flowers, berries, autumn colour - a street row of cherries or of hawthorn or of mountain ash can be a wonderful thing if planted at suitable intervals with the same tree. There is a reputable school of thought that observes that woodland can re-generate itself if left and that this is better than mass plantings. I am told there is scientific work which shows that unmanaged woodland can do better than managed! This needs to be thought about - the best thing may be light management. Recently the Hermitage of Braid was worked on extensively - trees felled and unfortunately there was much new planting of ash - now we can see that this is disastrous we have probably accelerated the ash disease by importing young whips from Holland. Simultaneously there seems to be an emphasis on Holly - do we really want so much Holly in our woodlands and in the Hermitage in some areas there was much Holly near paths - who decided that - Holly will grow to be a large tree and why a row along paths - it will need to be cut back after a few years - are you really wanting a holly hedge?? Too many whips in plastic tubes are put in - the plastic is protective and often they all thrive resulting in too many young trees. You talk about thinning in 10 to 30 years but better to put less in - and better spaced - they may still need to be thinned a bit or replaced if some don't thrive but this is more likely to be done if there isn't an over-whelming tangle. The millennium wood at the back of Blackford Hill is a good example of overplanting with little idea about good design - it badly needs thinning - when will that be done??	No young ash whips were believed to have been imported from Holland as a part of the Hermitage woodland restructuring. The city will continue to plant predominantly native tree species in woodland areas, whilst continuing to plant a mix of native and non native trees in Streets and Parks. Holly is a native woodland component and will continue to form a part of the species mix selected for woodland planting.
264		How do you ensure that the staff are sufficiently well trained? There should be more emphases on design - a lot of recent planting looks ill-conceived. Planting of trees on new development is often ill-designed. the planning department and the Forestry Dept need to address this. Developments of about 15 years ago may have lovely trees and now it is easy to see they are too near the buildings in many cases. In a few years there will be requests from the people in the flats or offices to get them removed or cut back. This is a tragedy that could have been avoided if the planners who see the designs for new development had a proper sense of the height some of the suggested species grow to. Better choice and positioning of new trees on new development is crucial - it is mentioned in the report but not given enough emphasis.	Comments Noted. The scope of the document will be revised clearly setting out the purpose and objectives.

265		Appropriately sited and designed tree planting' needs to be emphasised more. In northern climates like ours light is very important both to psychological well-being and to health - sun on skin is also our main source of vitamin D. So although tree planting is to be encouraged there is also a need for space for the sun to come through. Trees well spaced out can be a real delight as in the Botanics. So often the eventual size of the tree is not properly considered - even the Botanics gets it wrong occasionally!. Deliberate re-generation or new woodland planting is almost always much too dense - often every tree survives - it used to be thought 3 for every one you want to survive - but this is often a big mistake as all 3 survive and no-one maintains them or removes the excess. Better to put in one suitably chosen and to replace later if it doesn't thrive - most will with some minimal protection.	New tree planting is based on the "right tree in the right place" principle which should alleviate some of the issues currently posed by the cities trees in the future. Industry standards for woodland management are followed.
266		Many developments around the city are accepted by the planners as suitable and architects show computer simulated photos of leafy green trees with buildings showing through, however look at the species and it is clear that in 40 year or much less they will be a problem - this lack of knowledge by architects and planners needs to be addressed. Maintenance is all important - young trees need to be checked regularly especially if it is dry and older trees for damage which if dealt with can prolong the tree's life. You say this in your document but in reality you have great difficulty in doing this. Is it lack of personnel or not enough well-trained personnel? The problem needs to be analysed and solutions sought. And what might seem a trivial point - a lovely young tree can be spoilt if plastic tubes /plant stakes/ and ties are not removed in good time. A lot of good work is undone.	Comments noted. Maintenance of new tree planting is currently carried out as a matter of course.
267	Individual	A negative i.e. 'the Council won't do this, that and the other', although correct and clear. No argument with what wording tells the reader.	Comment Noted.
268		Generally very clear, just two points p.29 Common Law My reading is that one does not have a legal right to remove parts of a tree underneath the boundary of your property. Is that correct? Or is the position the same with branches, i.e. you have the right to remove them from the point at which they encroach your property? Should perhaps read 'that is not beneath your property'. p.35 7. Day to Day Tree Management Place sections 7.2 and 7.5 next to each other as they both relate to pavements.	The Common Law section of the document has been amended to include tree roots.
269		Generally yes. however policy 29 regarding interference with telephone wires seems unreasonable. Perhaps it is the responsibility of BT, but if it is, it would be useful if the policy said so.	Policy 31 which relates to telephone wires has been clarified.
270		The document is a bit weak on tackling the issue of disappearing street trees. I also worry that succession planning isn't mentioned strongly enough. A large number of important trees in Edinburgh will be becoming over mature, particularly street trees and trees in some parks (I exclude woodland trees) and there doesn't seem to be much mention of planning for the future so we are not left with huge gaps. There needs to be more dialogue with those taking over tree pits so trees can be replaced properly and that your dept doesn't find itself frozen out.	Actions to increase the number of street trees have been identified in the document.
271		Please prioritise street trees!	Actions to increase the number of street trees have been identified in the document.