Initials	Section	Comments	Council's Response
PH	No comments		
MR	General Comments	1.8 Additional Legislation needs to be added and that is the Council's responsibility to the Crime and Disorder Act 1998	Added onto the list of legislation that has an impacted on tree management.
		3.14 How are we defining Hatfield? People often look at Hatfield with regards to Town Centre only, and I am sure they do the same for WGC. It might (if possible) to look at the Town Centre's Specifically	This strategy doesn't aim to manage the trees in the town centres any differently to those in the wider urban areas.
		4. Bullet point 4 need to add CCTV to the list	CCTV is covered in Policy 2;5.3.
M L	Policy 3 - Tree Planting	It is good to receive your strategy document. As we are a tree officer down since Miriam Hill has moved on, I hope a new officer is to be employed soon to keep up the good work she and Oliver Waring have achieved.	We are pleased to report that the vacancy has been filled, the new officer started on 2.1.2018
		Miriam had noted that a replacement tree is needed (due to strimmer damage) outside 6Chelwood Avenue, AL1 00R and was including this for the 2017 winter planting. Could you please confirm this will still be happening, replying on this email address.	Tree planting in Chelwood Avenue has been instructed for the winter season 2017/2018 and I emailed you with this news on 23.2.2018.
SP	Policy 3 - Tree Planting	Para 3.14 WGC jurisdiction. "The expectation is that the tree population will be reduced from 27% to 25% over the next ten years". This is unacceptable. We should at least maintain the status quo. An example reason is because of pollution from the AI(M) whereby the trees and shrubs offset a proportion of the poor air. Breathing issues (especially amongst children) is on the increase.	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years. The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years.
	Policy 4 - Pests and Diseases	"Inspection of trees once every three years". This may well be insufficient where trees and shrubs are close to street lights and road signs so obliterating either or both. If speed limit notification signs are hidden this can be used as mitigating circumstances in any court case and/or leave the council vulnerable.	Specific problems, such as this one can be dealt with outside the inspection regime, see Policy 1; 4.1.
		Para 4.5 needs rewritten	Error reported and corrected.
	Policy 6 - Woodland Management	Para 6.1 The 'plan' is to plant 300 trees per year. This is too indefinite. A minimum of 300 trees/shrubs must planted.	The actual word is "target" which is a Performance Indicator that were are obliged to fulfil. It is used as a minimum figure, in many years we exceed this number. It only applies to urban street trees, we also plant in woodlands and orchards. Newly planted shrubs are extra to this target.

Po	olicy 8 - Green Infrastructure	A TPO audit is already underway. The current numbering is a mess. In Welwyn Heath we have a tree with 2 different reference numbers which has been reported but not resolved.	The Council is reviewing all of its Tree Preservation Orders as many of the Orders have been in place for many years with some trees no longer present or meeting the criteria to continue being protected. This is recommended by the Town and Country Planning (Tree Preservation) (England) Regulations 2012. As a result, where it is proposed to continue protecting a tree, woodland, group or area, a new Order is prepared. Once the consultation has been completed a decision is made, usually whether to confirm the Order with or without modification. At this time if the Order is confirmed the original Order will be revoked resulting in the tree, woodland, group or area only having one reference number.
	eneral Comments	The front page makes no reference to WHC.	The adopted strategy will be branded.
	eneral Confinents		
		Appendix 1 figures are over 5yrs old and therefore not credible.	Appendix 1 has been updated.
		Appendix 2 states "current urban tree population". 2012 figures are not current.	The figures for percentage of urban tree populations have been updated.
		Infills, whereby 1, 2 or even 3 houses are being built in private gardens. This practice is changing the urban landscape to a massive extent. Trees and shrubs are being removed before a planning application is submitted and the perpetrators are lying on the application form saying no prior work has been undertaken even when neighbours have verified to the council that a significant amount of work has already been done.	Unfortunately there is nothing that we can do if a land owner decides to remove some unprotected vegetation from a site prior to submitting a planning application. However, for developments that involve the creation of new dwellings, we will often ask for a landscaping scheme to be submitted and agreed in order to lessen the visual impact that may occur.
		Developers will (and have) just removed trees and then paid the nominal fine that may be levied. The fine is not enough of a deterrent.	If works are undertaken to protected trees, without consent, then the Council does have enforcement powers, but we do not set the level of penalty that may be applied.
H Q Po	olicy 2 - Urban Tree Management	As you may be aware the Tree Scrutiny group met for a one off meeting on Thursday 26th October to discuss the revised tree policy.	
		As councillors, complaints about trees form a significant part of our work so we do have a keen interest in the policy serving the people of Welwyn Hatfield as well as possible. As you are well aware the main issues that come up for us are loss of light, slippery pavements caused by algae/leaves/fruit and tripping hazards from roots on pavements.	HCC Highways are responsible for the condition of public paths. If algae causes an issue, they must deal with it.
		An additional worry is of course the incident involving the poplar tree in Jill's Ward and what can be done to mitigate any risks in similar situations. (Some of the discussion we had was around poplars maybe needing more regular inspection than other trees, or making sure that their trunks are more fully scanned for rot). We are concerned that the funding given to tree officers and issues may not be enough given the risks that trees can pose to people and property.	The failure of a mature Lombardy poplar in October 2018, despite both visual inspection and internal decay detection prompted the council to agree a comprehensive fell and replant programme of all the mature Lombardy poplar in the borough. This extensive project has been widely publicised and will begin in April 2018, replanting will take place in the winter season November 2018 – March 2019 and the aim is to complete the whole project by April 2019.
		Now to some specific pages from the policy.	
		After 3.14 on page 84 we would like another point adding in to describe the numbers of trees in WelHat and where they are (ie streets/woods).	It is not possible to provide a list of species and their locations without the expenditure of resources currently fully devoted to the tree
		Page 85. We are concerned that three yearly inspections may not be adequate for some trees. (le the poplars and	management service.

		trees that are close to people who have special needs or are elderly/infirm or trees that have grown to obscure streetlights and road signs). Perhaps add a line into the policy that where trees are becoming a risk to the public that will be investigated. Page 87. We have problems with the blanket "will not" statement and think there needs to be provision for exceptions made. For example where health can be impacted by lack of sunlight or where there is risk of falling in the elderly because of slippery pavements from fruit or leaves. Perhaps the addition of "usually" before carry out in the first line of text could alleviate this problem? Point 5.3 we would like the following changes In some instances there is a difficult balance to be struck between good treeensure that trees and woodland are managed to take into account people's health, safety and well-being. We hope these comments are helpful. Regards Cllrs. Weston, Cragg, Chapman and Quenet	Policy 1 adequately covers the requirement to investigate concerns that trees are becoming a risk to the public, outside of the rolling inspection programme, Policy 1; 4.1 applies. It is not possible to add the caveat "usually" against the policies that clearly state what the council will and won't do, as we need a clear instruction, embodied in the adopted policy, within which to operate. Fruit and leaves, once fallen on paths are always cleared through the grounds maintenance contract. Clause 5.3; represents the twin aims of the urban tree strategy and as such already embodies people's health and safety. Well-being is harder to prove, but a green environment is often cited as a contributor to this quality. Individuals' dis-satisfaction with the provision of urban trees, planted for the wider good, does present a difficult balance to strike, one that we do endeavour to resolve, but the council may decide that the wider benefit from the trees outweighs the individual's view.
CW	General Comments	3.14 Welwyn Parish Council believe that WHBC should aim for specified tree cover percentages in all parts of the	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in
		Borough. This would greatly strengthen us in our task of preserving the setting of Oaklands & Mardley Heath and other affected areas of our Parish.	English Towns and Cities, the paper was entitled; The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing. The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years.
			The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years.
	Policy 8 - Green Infrastructure	11.3 Welwyn Parish Council would suggest changing the wording in point 11.3 from Both WGC and Hatfield to WGC and Hatfield, and more especially some of the villages and their surroundings and settings	11.3 will be altered to read "Across the borough there is a wonderful legacy"
AW	Policy 3 - Tree Planting	Policy 3.14 - concerned that this is showing a clear reduction - surely this should be the other way around and there should be an increase in tree cover.	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25%

	Policy 1 - Active Tree Management	3.1 "Welwyn Hatfield is a satellite borough of London" This not true - Welwyn Garden City is set in Hertfordshire and is not a London borough The document has also failed to recognise the town's status as Garden City and the Town and Country ethos it was founded on. Section 1.4 States that the authority is not responsible for trees and woodlands within the areas that Finesse manages on its behalf. Finesse makes no mention of their own tree and woodland strategic policy if indeed they have one. This leads to a situation where the tree and woodland strategy for these important sites is unknown.	is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years. The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years. This statement has be altered. Finesse or any other subsequent leisure provider will approach the management of trees and woodland within its boundaries in the following way; Tree safety survey/inspection conducted by suitably qualified independent contractor on an annual basis Remedial works identified in annual survey completed within recommended timeframes Regular visual inspections completed by Finesse Grounds Team Follow up remedial works and further inspections completed by independent contractor following visual inspections Remedial works completed to stock classified as dead, dying, diseased, or dangerous (no cosmetic works completed) This approach mirrors Policy 1 of WHBCs draft strategy.
KH	General Comments	Hertfordshire Gardens Trust is very concerned that the historic significance of many trees in the Borough has not been given due weight. Historically, different species were used for different purposes - both in usage and in design terms .e.g. Horse chestnuts by Digswell Lake (Repton), Poplars (Garden City signifiers), Monks Walk Beech, Capability Brown Clumps by Digswell Rectory, Capability Brown rides in Sherrards Park, Temple Wood by Brown. There are also clumps of trees remaining from earlier landscapes (The Quadrangle, Harmer Dell, Digswell Park Sweet Chestnuts etc.) which are important in historical terms. We would suggest that these need to be specifically recognised in this document and included in one of the policies, perhaps Policy 5 where 8.4 mentions conservation areas. Although the document recognises that trees do have a historic interest, it does not mention that specific trees, or specific species have special significance. These trees need to be conserved and replaced like for like if needed.	We have amended Policy 3 by adding the following sentence; In addition, historically significant species will be acknowledged and replanted where possible. If exact species are no longer suitable because of the threat from pests and diseases or short life expectancy, species with similar form and impact will be selected.
MR	Policy 4 - Pests and Diseases	4.5 If not previously corrected, on the bottom complete line the word 'while' should read 'whole' 4.7 to 4.9 In the past the Council appears to have either over-react/ or to use the removal of one as an excuse to remove other trees that were not involved. As an example of this is the removal of a tree for subsidence reasons in Ridgway at the request of a householder backing onto Ridgway. The Council removed 3 mature trees in a well spaced line. The other houses diverged from Ridgway and so the other two were removed needlessly.(photos available)	Noted, thank you. Clauses 4.7 to 4.9 refer to the issue of subsidence. In cases where council trees are proved to be implicated in subsidence damage, remedial action must be taken. This is required by the property owner's insurer and cannot be avoided. No tree is ever needlessly removed.

	Policy 6 - Woodland Management	6, It is stated "will explain why a different species is selected"	Policy 3 altered to read "Where this is not practical, local residents will be notified and a different species will be selected".
		Who will it be explained too and how?	The council notifies by letter all local residents about new schemes in their area.
	Policy 8 - Green Infrastructure	8.6; I feel that this requires clarification for the average person.	
		"Higher authority" is referred to on more than one occasion, Who or what is it?	I can't find any reference to a higher authority in Policy 8.
	General Comments	Appendix 1 Street Tree Audit	
		Table 1 gives the number of trees involved in each section.	
		Could the pie chart of trees felled be replaced with a number list for consistence and ease of understanding please?	Appendix 1 Table 3 will be omitted and from April 2018 a felling list will be added to the web site every month.
		Appendix 2 Subsidence Policy	
		Third line from bottom, this appears to have one "were" too many	Noted, thank you.
		General comment	
		Please include the trees removed on behalf of Hertfordshire County Council, either in the WGC summery or as appendix to the report.	In Appendix 1 these figures do include the trees removed by WHBC on behalf of HCC Highways.
YR	Policy 1 - Active Tree Management	Should we assume the intention isn't to reduce the tree cover by 2%?	Yes, Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years. The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield
		What is the policy of tree stump removal following felling. There are many examples of protruding and re-growing tree stumps around the town, some have been in situ for years following felling.	and WGC already exceed the aim for cover within the next 10 years. The current policy is for all stumps to be ground out immediately after felling. However, there are some older stumps that have been missed over the years and we would appreciate an address (e.g. outside no x Handside Lane) so that we can add them to the list for grinding out.
		Where trees are within the EMS area, who is responsible for the maintenance?	Please email o.waring@welhat.gov.uk with locations, thank you. The EMS applies to privately owned property so all the trees within the area are the responsibility of their respective owners.
G D	Policy 3 - Tree Planting	6.1 The aim to plant 300 new trees each year should be considerably increased above 300 to reflect the rapidly growing population and associated infrastructure referred to in 3.2. If a Borough with the responsibility of looking after a Garden City cannot lead the way, who can?	Any development that comes through the Local Plan may well see an increase in the commitment to plant urban trees. This revision is only for the coming five years.

		The statistics quoted in 3.14 are confusing. Tree cover in Hatfield is estimated to be 20% and Welwyn Garden City 27%, but the document indicates that the aim over the next 10 years is to have a cover of 25%.	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years. The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years.
	Policy 8 - Green Infrastructure	8.5 A map of the area covered by the current Welwyn	All useful information, which includes the boundary of the EMS area,
НВ	Policy 1 - Active Tree Management	Garden City EMS would be useful in the document. On physical encroachment - should trees be cut back if they are touching overhead wires as well?	No, where lines run though the crowns of trees there is enough movement in the tree and overhead wire to accommodate both without damage. There are so many overhead wires within the crowns of trees in the borough and incidence of damage so rare that a policy is not required. We will deal with each report as it occurs.
	Policy 2 - Urban Tree Management	I have been contacted by residents about the issue of reduced light into their properties because of trees. The residents concerned were getting very little natural light in the rooms in question which means they need to have lights on constantly. This obviously has a cost implication but also an impact on their physical and mental well-being. These are residents who spend the majority of their time at home and I do believe this is an important issue. They are very unhappy that the Council has not considered their health important in the past and I do feel it should be considered now.	The council will only do works to trees covered in Policy 1.
	General Comments	I agree it is important to consider the role of trees on climate change and air quality and I think there should be stronger links made in the strategy to this aim- are the Council linking the tree strategy to air quality monitoring? It is also important to note however that sometimes hedges are a better barrier to pollution.	The Council's Environmental Health team is currently undertaking air quality assessments to ascertain whether there are any areas of poor air quality within the Borough. Should there be any specific areas of concern the Council will explore mitigation methods including the planting of additional vegetation.
CW	Policy 1 - Active Tree Management	 Private - Does this include trees with a TPO on private land? Can this be clarifed. Further information regarding Hertfordshire County Council's long term vision for their trees can be found at www.hertsdirect.org There should be a link to a document, not found when searched this site. Cannot find any long term vision doc, more detail needed. Is WHBC responsible for enforcing TCPA 1990 etc, if not who is? This should be stated. 	No, Policy 1 is solely concerned with council owned trees. "The council will aim to inspect trees within its management" HCC Highway Tree and Guidance Document January 2013 is easily found when searched for on www.hertfordshire.gov.uk . As the Local Planning Authority, we are responsible for enforcing the Town and Country Planning Act 1990. This clarification is added in Policy 5; 8.1.
		Should include the EMS map and what this system of protection actually is.	The map of the EMS area is publically available on line, as are the relevant policies that apply with regard to trees, hedges and landscaping. In particular, point 3 of the Stipulations, conditions and provisions binding upon each owner, set out in the Management Scheme (green booklet).

	Should specify what these industry standards are, recall from the Stanborough trees issue that there are several standards and interpretation varies.	Industry standards are embodied in BS 3998 Recommendations for Tree Work 2010.
	 There is no mention of how tree stumps will be managed at all, the town has a lot of ageing tree stumps dotted around now and we are told they should be removed after 3-6 months. 'The Council will aim to inspect trees within its management once within a three year rolling period'. 'Aim' is loose – what is the longest time that a tree will remain un-surveyed? However Clause 4 is more specific on the 3 years. 	The current policy is for all stumps to be ground out immediately after felling. However, there are some older stumps that have been missed over the years and we would appreciate an address (e.g. outside no x Handside Lane) so that we can add them to the list for grinding out. Please email o.waring@welhat.gov.uk with locations, thank you. Trees will be surveyed on a three year rolling programme. This point will be clearly re-stated in Policy 1
	Timeframe for reviewing tree belts? Many are looking dilapidated.	All trees, whether individual trees or those in tree belts will be inspected within the cyclical risk inspection regime. Control of the understorey is the responsibility of Environment colleagues through the grounds maintenance contract.
	 Enforcing tree maintenance on council tenants is disruptive, wasteful and futile. This is a significant aspect of extra work on housing officers. The council should maintain them and retain control at source. 	Under the terms of the Council's tenancy agreement (clause 3.35), the tenant is responsible for maintaining all the gardens, trees, and hedges within the boundaries of the property in a safe and hazard free condition. Enforcing tenancy conditions forms part of the standard duties and responsibilities of our housing officers in respect of council tenancies.
	Will it enforce management of TPO'd trees on private land, if not who will?	Trees protected by TPOs are privately owned and it is the owners exclusive responsibility to manage their trees. It is not possible to enforce against lack of management of privately owned trees.
	What does it mean to positively manage a tree?	Statement altered to read "The council is committed to managing its own trees through the policies set out in this strategy. However, occasionally works may take place over and above that which is stipulated to improve the long term viability of a tree."
	Will ground cover and/or canopy be inspected and invasive species be identified and managed?	Within Policy 1 the canopy of trees will be inspected within the cyclical risk inspection regime. Ground cover is controlled by colleagues in the Environment team that manage the grounds maintenance contract and they will deal with any invasive weed species they encounter.
Policy 2 - Urban Tree Management	Add policy on cutting back and pruning e.g. do not strip off all leaves in summer?	It is not necessary to have a policy concerning the time of year when pruning takes place. We instruct work for safety and where possible undertake works to certain species in seasons when they tolerate reduction more readily.
	Policy on succession planting?	Succession planting, planting replacements before the trees they replace have declined to the point where they are felled, is good practice where there is ample room to allow the replacements space and light to flourish in their early years. However, in urban areas there is rarely this space and in towns with distinctive and historic planting patterns where a reproduction of the original planting plan is desired, the only option is to fell and replant in the original positions. We favour the latter approach to replanting, Policy 3 applies.
	•	

	Policy on retaining similar species of similar age?	There is no requirement for a policy on this topic, tree are retained until they are no longer safe to remain in a public place.
	Policy on tree belts e.g. Daniels, Valley Road etc.?	All trees, whether individual trees or those in tree belts will be inspected within the cyclical risk inspection regime. Control of the understorey is the responsibility of Environment colleagues through the grounds maintenance contract.
	There is no mention of how tree stumps will be managed at all, the town has a lot of ageing tree stumps dotted around now and we are told they should be removed after 3-6 months.	The current policy is for all stumps to be ground out immediately after felling. However, there are some older stumps that have been missed over the years and we would appreciate an address (e.g. outside no x Handside Lane) so that we can add them to the list for grinding out. Please email o.waring@welhat.gov.uk with locations, thank you.
	Algae- isn't that a public liability if public paths become slippery and hazardous?	HCC Highways are responsible for the condition of public paths. If algae causes an issue, they must deal with it.
Policy 3 - Tree Planting	 Urban planting will seek to respect the original layout of concepts of Welwyn Garden City and Hatfield New Town. Avenues of formal planting will be retained until their decline dictates complete renewal is a more appropriate solution. Interim planting to fill any gaps will not take place. Sounds cheap? Just leave it to look poor and hope no-one notices? The extreme overgrowth and culling on Parkway Close showed the cheapness of this policy. Proper succession planting should be done rather than extreme overgrowth and culling. Another example is the demonstrations against the extreme culling on Parkway. Will WHBC finally listen to it's ratepayers? No mention of succession planting? 	The councillors have approved our recommendation that renewal of an even aged landscape is best achieved by felling and replanting within a span of 5 to 10 years. Succession planting, even if it were achievable, is not favoured. There were some members of the public that disagreed with the final phase of felling and replanting of the horse chestnuts affected by bleeding canker at the southern end of Parkway. However, as this was the final phase the plan proceeded as the diseased trees needed to be felled and the replanting undertaken to match the new avenue fast establishing.
	WHBC seem to be retaining the "no pruning of lower branches on trees" though they do refer to specimen trees only. This might be a change in policy but I still think it wrong. Once again the tree policy is "tree centric" and, not as required in WGC, "setting centric".	Mature specimen trees on prominent open spaces that sweep to the ground will not have their crowns lifted. The majority of urban street trees have clear stems and will be maintained in that form.
	The classic example are the trees on the left of the road opposite the Police HQ. These trees did have their lower branches removed after a long battle but they do require the mowers to go beneath them and the debris to be occasionally picked up. The setting here is "parkland" and not urban jungle which is what happens if you leave them. On that same piece of land where you turn into Lemsford Lane, they had to clear the urban jungle but have failed to specify how	The maintenance of ground under trees falls to the Environment team who manage the grounds maintenance contract.

	Business Plan has a target to plant 300 the borough, on publically owned land, This annual minimum number is achievable within the budget and staff resource available. The budget also has to cover the three year
• Why 300?	
	commitment to water and maintain young trees.
• 300 new tr	ees excluding replacements? No. This this total includes replacing those felled, if a replacement is required.
	There is an approved plan for the felling and replanting of all the council's mature Lombardy poplars. This will start in April 2018 and be completed by March 2019. This is a commitment over and above the annual tree management and replacement plans.
location, e Will it be a	referred practice to replant in the same ven if not always possible? Priority to replant locations, rather than Yes.
	w locations? Imps of these trees also be removed or Yes.
	Yes, stumps are always ground out unless they are in such a tight spot that the machinery can't reach them.
	d. It doesn't mention replanting at all? We rely on natural regeneration in all woodlands where felling is undertaken. If the expected regeneration is not adequate within 10
	years we are obliged within the terms of the Woodland Improvement Grant to supplement planting. This statement will be added to 4.10.
	The majority of the trees belts in the borough are mature and canopy cover complete. The removal of trees for safety reasons often just allows the remaining trees room to grow and spread. Replacements are un necessary and would struggle in the low light levels within the tree belts. We will only replant where felling has made a gap large enough to warrant replanting.
	evergreens? More were going to be particularly as many are lost on private space allows and a replanting scheme doesn't dictate a particular species, evergreens are considered.
Policy on	When replacing a formal scheme planting 10 years is the maximum gap that should be allowed for different aged saplings to grow to maturity at the same time. This is built in to phased renewal schemes and a separate policy is not required.
Policy 5 - Protecting Trees through the Planning System • Felling rep	lacements - In the same location? Yes, where possible.
WHBC not	nt developments have very few trees, can specify a target number per dwelling or ew developments? No, a standard can't be enforced, planning colleagues seek the best landscape provision possible for each development site that requires consent.
	This revision is more succinct. Trees within tree belts are now dealt with within Policy 1, 4.2 which deals with all urban trees wherever they are located. Conservation areas are referred to in Policy 5; 8.4.

	EMS map should be included and details of how to apply for EMS consent should be included.	All useful information, which includes the boundary of the EMS area, provided by the council is shown on the community map on our web sit Details and forms for an application for EMS consent are also all available on the web site.
Policy 6 - Woodland Management	Notice boards - Commonswoods boards are missing or dilapidated!	In 2018 The Commons LNR will be improved with new access and signage along the boundary with the hospital. All dilapidated noticeboards and bases will be removed.
Policy 7 - Community Engagement	 Policy 6 and 7. These sections talk about woodland management and community engagement but the text majors on volunteer involvement rather than the wider community. Suggest deleting the phrase 'Public access will be discouragedfrom Policy 7. This could be used to deny the public access unnecessarily. The public need to use these assets more. Vandalism does occur, but evidence based research shows that greater access by the public reduces vandalism. Vandals do not like to be disturbed! Greater public access is also likely to lead to more people-young and old, from taking an interest in their natural surroundings and getting involved as volunteers. The present draft smacks too much of woodlands for their own sake rather than the wider role they can and should perform-which other policies of WHBC, HCC and the NHS seek to address. Suggest an addition to Policy 7 "There will be a 	Policy 6, Woodland Management, states that public access will be discouraged from some parts of both Sites of Special Scientific Interest (SSSIs) during bird breeding seasons. This is good practice and the policy will remain unaltered. The council is obliged to manage its SSSIs in line with legislation the Wildlife and Countryside Act 1981. Public access is not denied unnecessarily, but sometimes the requirements of the SSSI take precedence. Fortunately, vandalism is not a major issue in either SSSI Policy 7 Community Engagement will not be altered to add a general Right to Roam invitation. Access is open year round to all council
	general 'Right to Roam' throughout the council's woodlands unless specific woodland management activities require that to be withdrawn on a localised basis for a limited period. Public access to woodlands in the council's ownership will be encouraged and enhanced as part of the council's wider strategy for improving the health, wellbeing, sport and informal recreation."	owned open spaces, except when we restrict access in the SSSI for nature conservation, but we encourage all visitors to use the existing network of paths that provide ample access for informal recreation.
General Comments	General comments on plan	
	 Special measures for a Garden City? Should be an over-riding consideration in certain areas. Replacements – what is the long-stop date for the public to expect a tree replacement? No mentioning of watering? 	Neither town centre is selected for over riding consideration in this strategy. If we intend to replant, a tree will be planted within three years. The following statement will be added to 6.1 "The young trees will be watered twice a month between April and October for three years."
	No mention of pruning of offshoots?	Minor pruning works are covered within the commitment in Policy 1 if they are required.
	No mention of WHBC tree contractor/ grounds maintenance duties?	This strategy doesn't cover the responsibilities of the council's contractors.
	No mention what the public can do to help?	

		Any member of the public interested in helping is encouraged to join the Tree Wardens group. There is a programme of events that we coordinate which is tailored to Wardens interests where possible.
	Historic aspects: we are very concerned that the historic significance of many trees in the Borough has not been given due weight. Historically, different species were used for different purposes - both in usage and in design terms.e.g. Horse chestnuts by Digswell Lake (Repton), Poplars (Garden City signifiers), Monks Walk Beech, Capability Brown Clumps by Digswell Rectory, Capability Brown rides in Sherrards Park, Temple Wood by Brown . There are also clumps of trees remaining from earlier landscapes (The Quadrangle, Harmer Dell, Digswell Park Sweet Chestnuts etc) which are important in historical terms.	
	We would suggest that these need to be specifically recognised in this document and included in one of the policies, perhaps Policy 5 where 8.4 mentions conservation areas. Although the document recognises that trees do have a historic interest, it does not mention that specific trees, or specific species have special significance. These trees need to be conserved and replaced like for like if needed	We have amended Policy 3 by adding the following sentence; In addition, historically significant species will be acknowledged and replanted where possible. If exact species are no longer suitable because of the threat from pests and diseases or short life expectancy, species with similar form and impact will be selected.
	1. Introduction	
	 WH as 'a satellite borough of London' is crass. There must be many other descriptions in existing official docs made by WHBC that are much more thoughtful and elegant. 	The suggested text here is used in its entirety.
	If nothing else say 'WH is a borough to the north of London in the County of Hertfordshire. The two principal towns are Hatfield and Welwyn Garden City.'	
	Green belt not mentioned.	No policies in this strategy have an impact on the green belt.
	 Less information than previously e.g. no numbers of tree belts. 	This revision is more succinct. Trees within tree belts are now dealt with within Policy 1, 4.2 which deals with all urban trees wherever they are located. Conservation areas are referred to in Policy 5; 8.4.
	 No facility to access maps of locations e.g. woodland; tree belts. 2. Definitions 	All woodlands are shown on the community map on the web site. There are no tree belts currently shown on the community map.
	 WHBC have a responsibility to oversee Finesse Leisure. The disruption caused by the 'Stanborough Poplars' issue shows that ignorance is not bliss. 	Finesse's approach to tree management mirrors Policy 1 of WHBCs draft strategy.
	3. The Trees and Woodlands in the Borough	
	 Population growth projected - So tree plantings will increase with population growth? 	Any development that comes through the Local Plan may well see an increase in the commitment to plant urban trees. This revision is only for the coming five years.

			No control of ivy on mature trees?	We will specify the removal of ivy from trees as and when we consider it
				necessary. In some instances ivy provides a valuable habitat.
			 Requirement for Management Plans appears to have disappeared? 	Woodland management plans are only required for those sites where the council applies for management grants from the Forestry Commission. Within this strategy there are management plans for Sherrardspark Wood, Northaw Great Wood and Mardley Heath.
			 Value – Add maintaining the ongoing visual amenity the borough's trees provide. 	Visual importance is mentioned in 3.3. 3.4 is a statement in the introduction.
			 Rural areas 3.4 is vague and too high level. 3.14 Tree cover – So is this saying tree cover in WGC should be reduced by 2% over the next 10 years? Surely not. 	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban
				environment and climate change within the next 10 years. The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years.
			12. Monitoring and Review	
			10.4. says The members of community who freely give their time to help protect and preserve the amenity, ecology and biodiversity of the borough are invaluable and the council recognises the need to match enthusiasm with support if their involvement is to be maintained.	
			 Sounds great – however the impression in reality is that officers are too busy doing their 'day-job' so are not able to harness the enthusiasm of wardens? Appendix 1 - Street Tree Audit 	Volunteers are thriving, the contribution from those working on the nature reserves is much appreciated. The Sherrardspark Wood Wardens and Friends of Danesbury go from strength to strength. Take up of events offered for Tree Wardens has not been so good and sadly in 2017 the events planned and run by officers were not supported.
			2012 data is very old	Appendix 1 has been updated.
WD		Policy 1 - Active Tree Management	Who will manage and enforce TPO's where they are on private land?	Managing the condition of trees protected by a TPO is the responsibility of the owner, however, if they wish to do work to a tree, they must obtain consent first. As the Local Planning Authority, we are responsible for enforcing the Town and Country Planning Act 1990.
			4.5 What does it mean to positively manage a tree? The intention of this approach should be set out.	Statement altered to read "The council is committed to managing its own trees through the policies set out in this strategy. However, occasionally works may take place over and above that which is stipulated to improve the long term viability of a tree."
			4.10 What risks are there in letting trees grow unhindered if the are not part of plan, what about invasive species that	

		could take hold, or excessive ground cover that would block out lights and nutrients. Are there areas that would be completely void of monitoring or would all woodland areas tree belts be checked at some point?	Policy 1 applies to all council owned trees identified in 4.2. Understorey ground cover in tree belts is maintained by the Environment team through the grounds maintenance contract.
F	Policy 3 - Tree Planting	6.2 Will it be the preferred strategy to replant in the same location if possible? Unless there are clear barriers to doing so.	Yes
		6.5 What is the policy for also removing tree stumps, this should be documented? In recent years there are examples of tree being felled and the stumps never being removed, both in verges and tree belts. I'm aware of stumps being left in the ground for months and years. This also means a replacement tree cannot be planted in the same spot. How long a stump should remain post felling should be stated.	The current policy is for all stumps to be ground out immediately after felling. However, there are some older stumps that have been missed over the years and we would appreciate an address (e.g. outside no x Handside Lane) so that we can add them to the list for grinding out. Please email o.waring@welhat.gov.uk with locations, thank you.
F	Policy 5 - Protecting Trees through the Planning System	Will a TPO require a new tree to be planted in the same location if it is felled for whatever reason?	Yes.
		Some recent developments in the town have very few trees and small verges due to densities. Can there not be target figure that new developments must meet or exceed, so many trees per dwelling for example? This is Garden City in name only if new developments are allowed with very trees and nearby wooded area. When Milton Keynes began all new householders were given a free tree voucher from the council, allowing them to plant at least one tree in their garden.	No, a standard can't be enforced, planning colleagues seek the best landscape provision possible for each development site that requires consent.
		8.5 mentions the EMS area but there is no map showing where it applies and no definition of how trees are managed in the EMS or conservation areas. More definition is needed on this.	The community map on the website shows a wide range of information including the EMS area. All matters relating to this scheme are to be found on the website.
F	Policy 6 - Woodland Management	9.2 The signposts and interpretation boards at Commonswood Nature Reserve have been dilapidated and unreadable for some years now. There is no signage. Will the boards be replaced/renewed in line with this policy?	In 2018 The Commons LNR will be improved with new access and signage along the boundary with the hospital. All dilapidated noticeboards and bases will be removed.
F	Policy 8 - Green Infrastructure	There is no mention of definition of the Green Corridor that stretches across a large part of the Borough. This should be defined and map included. The document should state what WHBC will do if land-owners and/or developers plan to make incursions into this defined space.	The detail of this policy will be set out in the emerging Local Plan as referred to in Policy 8;11.2.
		The relevant wildlife acts should also be included for cross-referencing.	All relevant Acts as well as policy and guidance documents are listed in 1.8.
		Section 12.3 is very welcome, information about planned and recent fellings should continue to be made available online. This ceased for several years and it is good to see it returned.	Noted, thank you.
	General Comments	Section 1.5 HCC's long term vision for the trees they manage in our area. The link given is incomplete. I have searched for this document on the HCC website and cannot find it. Please include a full working for it?	HCC Highway Tree and Guidance Document January 2013 is easily found when searched for on www.hertfordshire.gov.uk .
		1.6 Does WHBC enforce these regulations, if not who does? This should be included.	WHBC does not have power to enforce HCC policy, that ability only resides with the HCC.

		1.9 Information about what these industry standards cover	Industry standards are embodied in BS 3998 Recommendations for Tree
		and what they are should be documented and link to where they can be found should be included. This way Local Groups and WHBC etc. are all following the same reference standards document.	Work 2010.
ET	General Comments	Comments on the INTRODUCTION:	
		INTRODUCTION	
		1.4 . Private ownership: what about trees on private land with TPO's?	The council is not responsible for trees on private land that are subject to TPOs. The owner is responsible for maintenance and must apply for consent to do work, if it is required.
		1.5. There should be a link to the document referred to. Am I right to think this document is the four year-old strategy paper, entitled, "Highway Tree Strategy and Guidance Document, January 2013" (https://www.hertfordshire.gov.uk/media-library/documents/highways/plans-and-strategies/highway-tree-strategy-and-guidance-document.pdf)	Yes, this is the correct link to the HCC document referred to.
		1.6. Paper should be explicit and state that WHBC is responsible in enforcing TPO's	This will be added to Policy 5.
		1.7. The Map of EMS area should be included in this section.	The community map on the website shows a wide range of information including the EMS area. All matters relating to this scheme are to be found on the website.
		3.1. The Borough of Welwyn Hatfield is a local government district in southern Hertfordshire, England. It is <u>not</u> a satellite borough of London, by any reckoning. According to the 2011 Census data, 40.9% of Welwyn Garden City's 23,255 residents in employment either work at a workplace in the town, or work from home; 12.2% of residents work elsewhere in Welwyn Hatfield Borough; 19.0% work elsewhere in Hertfordshire; <u>only 14.9% work in London</u> , 7.6% have no fixed place of work, and the remaining 5.4% work further afield.	This statement will be altered.
		3.14. This section states that WGC currently has 27% tree cover and it goes on to suggest that 25% should be aimed for over the next ten years. It is clearly unacceptable to be proposing a nearly 10% reduction in the number of trees from 27% to 25%.	Clause 3.14 reproduces research commissioned by a group called Forest Research that examined concerns over the loss of tree cover in English Towns and Cities, the paper was entitled; <i>The Canopy Cover of England's Towns and Cities: baselining and setting targets to improve human health and wellbeing.</i> The target of 25% tree cover is a guidance for tree managers across England and not specific target for Welwyn Hatfield Borough Council. The base line survey actually recorded both Hatfield and WGC has having a higher percentage of tree cover that the recommended country wide target. It is an ongoing research paper which assessed Tree Canopy Cover of 265 English towns and cities and the recommendation within the paper is that a Tree Canopy Cover 25% is needed to offset the negative impacts of living in an urban environment and climate change within the next 10 years.
			The clause was added as a point of information only and not a target for the borough to work towards. As the base line survey revealed, Hatfield and WGC already exceed the aim for cover within the next 10 years.
	Policy 1 - Active Tree Management	POLICY 1	
		Aiming to inspect is too vague. What is the current level of performance, as it is nothing like inspecting once every three yearsThere are two old Catalpa trees on the pavement of Youngs Rise WGC and no one has inspected	The inspection regime in Policy 1 will be restated to make the commitment very clear.

			,
		them in years and last year one huge branch crashed down and now, another is going into the hedge. Secondly, by when will the Council achieve this target of inspecting once every three years. Such targets should be Specific, Measurable, Attainable, Realistic, and Time Bound (aka 'SMART', 6Σ)	
	Policy 2 - Urban Tree Management	"The Council will not carry out tree work to Borough Council trees or Herts County Council highway trees for any of the following reasons:	
		To alleviate build-up of algae and moss or prevent dampness on paths, structures or gardens"	
		Surely slippery paths leads to public fall and that is a Public Liability.	
		The policy falls short on pruning guidance indicating that trees should not be stripped-off all leaves in the summer, like they are done on Parkway WGC	HCC Highways are responsible for the condition of public paths. If algae causes an issue, they must deal with it.
			It is not necessary to have a policy concerning the time of year when pruning takes place. We instruct work for safety and where possible undertake works to certain species in seasons when they tolerate reduction more readily.
	Policy 3 - Tree Planting	This policy does not protect the environment of our Garden City, as it allows rows of trees to become dilapidated before the whole row is replaced rather than maintain the visual effect of the row of trees at all times by maintaining and replacing.	Trees will remain in the environment until they become unsafe. In formal plantings of the same age some of the trees reach the point where they have to be removed whilst others can remain. However, there comes a point when too few old trees remain and the visual impact is lost and at this point the last are felled and the whole scheme replanted.
		I like to see the trees within WGC have their lower branch growth pruned, in order to preserve the parkland scene and not become cluttered woodland, as has been allowed opposite the Hertfordshire Constabulary on Stanborough Road. This area is one the main entrances to the Garden City and it should be cared for as such.	Mature specimen trees on prominent open spaces that sweep to the ground will not have their crowns lifted. The majority of urban street trees have clear stems and will be maintained in that form.
		"The Council's Business Plan has a target to plant 300 urban trees across the borough, on publicly owned land, each year." The rationale for planting 300 trees needs to be provided to make sense of this statement. For example, are these additional trees, or replacements? In the absence of this essential contextual information, why should anyone be pleased about this part of the plan?	300 trees are planted every year, some of which are replacements. The split varies from year to year, depending on how many are felled. In some years far more than 300 are planted when large renewal schemes are replanted.
		"Trees removed from tree belts or groups of trees will only be replaced when the barrier effect has been compromised". This is a subjective policy that will lead to the partial deforestation of Welwyn Garden City. I disagree with the policy of not replacing the trees removed from the tree-beltno ifs, no buts.	The majority of the trees belts in the borough are mature and canopy cover complete. The removal of trees for safety reasons often just allows the remaining trees room to grow and spread. Replacements are un necessary and would struggle in the low light levels within the tree belts. We will only replant where felling has made a gap large enough to warrant replanting.