



Developing a Tree Strategy for Bristol

Bristol City Council is currently writing a tree strategy for Bristol. This is welcome news, as the Bristol Tree Forum has been calling for such a strategy to be developed for more than a decade.

For example, in 2020 we wrote a [Manifesto for Protecting Bristol's Urban Forest](#).

A tree strategy should be an evolving process rather than a document which may quickly become out of date. This is particularly true in our rapidly changing world - environmentally, climatically and politically. To provide an effective response to the challenges these present, a group of representatives from both civic and professional groups (along the lines of the Bristol Advisory Committee on Climate Change (BACCC), should be established to help coordinate further research and make recommendations to Bristol City Council and other stakeholders as the situation changes.

We also recommend that the development of a tree strategy should take full advantage of exemplars from other local authorities¹. We should have the ambition to make Bristol's tree strategy the best.

Here follow 18 key points that we would expect to see included in a strategy.

1. **Buy in from all the stakeholders involved.** Many council departments (as well as Parks, there is Highways, Education and Planning) have a role to play in the management of Bristol's trees. We need to see evidence that all such departments are fully involved in the development of the strategy. In particular, with the current review of the Local Plan, it is essential that Planning is fully engaged with the strategy, and that the two documents are consistent and properly cross-referenced. The tree strategy needs to be incorporated into the new Local Plan. In addition, other important landowners (such as the universities, utilities providers, housing associations, schools and hospitals) have a role to play in contributing their expertise to the strategy and implementing its goals. As well as the Bristol Tree Forum, many community groups have an interest in tree planting in Bristol and should be involved and consulted.
2. **When council trees are removed, they must be replaced.** At present there are more than 800 street tree stumps and empty tree pits around the city - sites where trees once grew. A plan to plant all these missing trees within five years needs to be included. In the future, when any council trees are damaged or felled, they should be replaced within the next planting season.
3. **There needs to be [community engagement in tree management decisions](#)** both at the level of individual trees and in strategic decisions. In recent years we have seen a rise in community led campaigns to protect trees, such as the Ashley Down Oak, the M32 maples and Baltic Wharf, and this is indicative of a disconnect between the Council and the communities it serves. When the balance of the Environment Act 2021 takes effect later

¹ See for example the Wycombe Council Canopy Cover Doc https://buckinghamshire-gov-uk.s3.amazonaws.com/documents/Canopy-Cover-SPD_3qAkk4z.pdf



this year, Councils will be obliged to consult when street trees are being considered for removal². This is too narrow and should be extended to include where any public tree is being considered for removal. Therefore, part of the strategy should be promoting community engagement, providing mechanisms for engagement and then taking account of the concerns of the community and tree campaigners alike.

4. **There should be one person responsible for trees within Bristol City Council.** At present we have tree planning officers, tree maintenance officers and tree planting officers with no single individual or office accountable overall, often resulting in a lack of appropriate action or people working at cross-purpose. It is also concerning that Highways are able to remove street trees without any consultation.
5. **There needs to be a plan to address the massive inequality in tree cover in Bristol,** which often mirrors social and financial deprivation in the City. For instance, additional protections could be given to trees, and tree planting prioritised, especially in deprived areas such as the City Centre, Harbourside and St Pauls.
6. **When developers remove trees, the replacements required should be planted by BCC.** Too often developers have shown themselves incompetent or unconcerned when planting trees, so the trees fail or are never planted. In the case of Metrobus, there has been a more than 100% failure rate of trees in some places (trees have been replaced multiple times). We have an excellent tree planting team in Bristol and we should benefit from requiring them to organise and implement the planting required. The cost should be funded by the developer.
7. **Retaining existing trees must be a major part of the strategy.** A tree strategy cannot be just about planting new trees, the benefits of which will not be realised for decades, but crucially about retaining and protecting existing trees and the benefits they are already providing. As such, the strategy must address the threats to existing trees. Planning is crucial in this so we would expect major engagement with Development officers to address the current and future problems.
8. **Planning Enforcement must address the illegal removal of or damage to trees.** At the moment there are no consequences following the unauthorised damage or destruction of trees. This must change. Other neighbouring local authorities manage to do this but not Bristol. A strategy must include a review of the reasons for the existing lack of effective enforcement and make recommendations as to how this can be rectified.
9. **Developments should be built around existing trees** as is already required³. Other local authorities do this but not Bristol. This will require a change of culture in the planning department so that pre-application discussions with developers make it clear that this will be required.

² <https://www.legislation.gov.uk/ukpga/2021/30/part/6/crossheading/tree-felling-and-planting/enacted>

³ Bristol Core Strategy, policy BCS9 states that, "Individual green assets should be retained wherever possible and integrated into new Developments."



10. **The sites for the replacement trees must be agreed before** Planning Applications are approved. This is required by planning policy (BCS9 and DM17), but currently developers are being allowed to, instead, pay a “fee” into Section 106, and frequently the replacement trees are never planted. Trees form an important part of our urban habitat. The calculation of tree replacements required to compensate for their loss must be aligned with the Biodiversity Metric as adopted under the Environment Act 2021.
11. **Spend the £ 900K+ reserved for tree planting.** Connected with the above point, a strategy needs to include a mechanism for spending the existing £900K+ of unspent tree planting Section 106 money within the next three years.
12. **A strategy to increase Bristol’s tree canopy cover** (or at the minimum, maintain existing canopy cover) needs to have a route to implementation This must include addressing the loss of street tree canopy cover by being bolder in selecting new tree planting sites and planting large-form trees wherever possible. Trees such as rowans and flowering cherries are short-lived and will never provide much canopy or become robust enough to survive our challenging urban environment in the long-term.
13. **Canopy Cover needs to be measured with an agreed methodology** with confidence limits (levels of doubt in the estimate) made clear. In the first instance, we need to establish the baseline year and percentage tree cover from which progress will be measured. Only then will it be possible to show whether a trend has been determined. Two measurements using different methodologies should not be used to claim an increase in canopy cover. The metric should take account of trees lost so that the figure reflects the true increase, or loss.
14. **Include trees within road changes.** There needs to be proper engagement with Highways at early stages of the design process for road changes to look at retaining the maximum number of existing trees and including innovative planting opportunities for new large-form trees, such as pavement build-outs.
15. **For new developments, trees should be properly considered at the pre-application stage**, with appropriate consultation with stakeholder groups. Too often, the mitigation hierarchy requiring the removal of trees to be a last resort is disregarded, so that it is only after the design has been finalised that the existing trees are considered and removed where they conflict with the design scheme.
16. **Biodiversity Net Gain (BNG) calculations need to be checked by the Local Planning Authority and biodiversity loss must not be monetised as BTRS has been.** BNG, if properly implemented, makes sure that biodiversity on development sites is properly measured and will provide a net gain (soon to be least 10%) is factored in. However, at present, developers' calculations are not being checked. When we have provided properly evidenced calculations, these have been dismissed by the LPA as mere differences of opinion. You cannot have differences of opinion on facts. The LPA must require that BNG calculations are presented in a way that can be checked by anyone interested and actually



do the checking. In addition, ensuring BNG must require that the development site does not lose its biodiversity. If this is not possible, then its immediate local environment must be used to offset any onsite losses. Onsite losses must not be compensated for in some faraway place completely removed from Bristol.

17. **Planning Applications involving trees must mention this fact in the title.** Too often, applications that [involve the loss of important trees](#) (or plans to avoid the planting of new trees⁴) do not even mention this fact in the title. This means that it is extremely difficult for community organisations to engage.
18. **Once a planning application has been issued, no removal of trees.** A moratorium should be placed on any tree felling pending the outcome of the planning application. This includes applications to demolish buildings which should exclude tree or other habitat removal.

02 May 2023

⁴ See the Avon Crescent Application pp136 – 155
<https://democracy.bristol.gov.uk/documents/g10675/Public%20reports%20pack%2010th-May-2023%2014.00%20Development%20Control%20B%20Committee.pdf?T=10>