

# MAYOR OF LONDON

**Department for Environment Food & Rural Affairs**

Climate and Forestry team  
1st floor, Seacole Building 2  
Marsham Street  
London, SW1 4DF

**Date:** 27 February 2019

(Via email [Dan.Doherty@defra.gov.uk](mailto:Dan.Doherty@defra.gov.uk))

Dear Dan,

## **CONSULTATION ON PROTECTING AND ENHANCING ENGLAND'S TREES AND WOODLANDS**

We welcome the Government's recognition that urban trees play a pivotal role in creating healthy and economically successful communities and places for people and wildlife.

This view is shared by the Mayor, who is committed to maintaining and expanding London's urban forest. He is delivering a major tree planting programme and has established a target in the London Environment Strategy to increase the capital's canopy cover by 10% of its current area by 2050.

The Mayor's draft new London Plan strengthens policies to protect trees and woodlands. He is also working with members of the London Tree Partnership to develop an Urban Forest Plan, and with local authorities to explore new approaches to street tree planting.

While the Greater London Authority (GLA) is not directly responsible for the management of individual urban trees, the Mayor is strongly supportive of their protection and effective management, and of greater community involvement in this process.

This consultation provides an opportunity to outline a coherent approach to improving the management of England's urban trees, that empowers local authorities and supports them to adopt best practice and raise standards, whilst enabling communities to play an active role in this process.

We are therefore concerned that the current proposals fall short of the Government's welcome ambition. Whilst the felling of individual street trees is an important concern, by taking this as a starting point, the consultation represents a missed opportunity to take a more holistic perspective on urban forest management.

Whilst we are supportive of the principles behind each of the three proposals relevant to urban trees – avoiding unnecessary felling of street trees, improving local authorities' tree data, and encouraging a more strategic approach to urban tree management – their current form lacks clarity, consistency and practicality.

We are concerned that the proposals currently outlined both risk increasing the administrative burden on local authorities and fail to provide genuinely effective mechanisms for communities to influence decision-making. As currently proposed it's unlikely they will meet the needs of local authorities or the public, failing to solve the issues that the Government rightly wishes to address.

The framing of this consultation, and the approach, should start with Tree and Woodland Strategies. A Tree and Woodland Strategy should provide a framework for local authorities to value and manage their tree stock, and this strategy should include an authority's policies on tree planting, felling and management. The implementation of Tree and Woodland Strategies must be properly resourced if they are to be effective.

Reporting should have a strategic purpose, related to the objectives and targets in a Tree and Woodland Strategy. These objectives should focus on trees and woodlands owned and managed by the local authority, which it can implement and monitor directly.

The duty to consult, as currently drafted, could result in a significant additional administrative burden for local authorities. We understand that Defra are required to recompense local authorities for this additional burden. We suggest that the amount that local authorities are compensated should be ringfenced for tree planting and management. We are concerned that, without the appropriate level of recompense, the additional burden of the duty to consult could reduce the capacity of London's local authorities to carry out routine tree planting and management and have potentially negative consequences for London's urban forest.

### **Transport for London and the Greater London Authority**

Transport for London (TfL), part of the GLA group, is responsible for managing street trees on the Transport for London Road Network (TLRN). We understand that the proposed duties are likely to apply to TfL. We support its response to this consultation, which outlines the potential impacts of the Government's proposals on TfL operations in more detail.


Whilst the consultation proposes that the duties to consult and report on street tree felling applies to local authorities, any final proposals should clearly set out which other organisations, such as TfL, are also subject to the duties.

Overall, we welcome the Government's ambition to improve the management of urban trees and enable communities to play an active role. The proposals will only work if they are clear, practical and properly funded.

We suggest that the government should reconsider their proposed approach to consultation and reporting and prepare revised proposals. The government must consider how the proposals will work in practice and assess the burden to local authorities. Any resulting final proposals should be piloted before being made mandatory to evaluate how they work in practice and to help assess the burden to local authorities.

I hope that our response is helpful. Greater London Authority officers would be happy to discuss any points raised in this letter.

Yours sincerely,

A handwritten signature in black ink that reads "S-A Rodrigues". The signature is written in a cursive style with a long horizontal stroke at the end.

**Shirley Rodrigues**

Deputy Mayor for Environment and Energy