

# URBAN FOREST STRATEGY

## INTERNAL CONSULTATION REVIEW

### SUMMARY

In September 2025, Cambridge City Council Cabinet approved the emerging 2026 to 2036 Urban Forest Strategy, to replace the expiring 2016 to 2026 Tree Strategy, subject to internal and external consultation.

The internal consultation, which commenced on 27 October 2025 and ran until 9 December 2025 is now closed and the comments received analysed.

Responses indicate that the Urban Forest Strategy, it's vision, principles, aims, policies, actions and Topic Papers are generally supported. Comments reveal that minor amendments will aid clarity, document navigation and comprehension but that there are no risks to deliverability, resourcing, finance and governance.

Authorisation is therefore requested to amend the UFS and referenced topic papers, as detailed below, and proceed to public consultation in January alongside the Biodiversity Mid-Strategy review.

### CONSULTATION

The current 2016 to 2026 Cambridge City Council Tree Strategy is approaching expiry. In September 2025 Cambridge City Council Cabinet approved the replacement 2026 to 2036 Urban Forest Strategy subject to internal and external consultation and final Cabinet review in March 2026. The internal consultation has been completed and its review is set out in this report.

The consultation was carried out in accordance with current council protocol. On 22 October 2025, introductions to the consultation were made via email to:

- Selected internal Services
- Members (City and County Ward Councillors)
- Partners (GCSP, County Highways, GCP)
- CCC Directors

Emails informed that, from Monday 27 October to Friday 21 November, Cambridge City Council would be running an internal consultation on the *Urban Forest Strategy 2026-2036* and its supporting *Topic Papers*. Emails provided a link to the internal consultation, requested teams were alerted to the consultation, encouraged to review the documentation and respond via the MS Form (link included). A reminder email was sent out to all the groups listed above on the 24 November 2025.

The consultation was posted on the intranet on 27 October with a news article requesting staff to view and comment.

Four, online webinars were advertised and held over 10 and 11 November.

The consultation was re-posted on the intranet 12 November to introduce a recording of the 'General Overview' Webinar and ensure the consultation was again highlighted as a news item.

Early drafts of the UFS, Cabinet paper and consultation plan were shared with the BNE Team on 11 September 2025 and draft Topic Paper 4 and 9 shared 2 October 2025

Later drafts of the UFS and all topic papers were shared with the BNE Team on the 7 October 2025.

At the request of Development Services, the consultation was extended to 5pm on 28 November.

The consultation was further extended to 5pm on 5 December and again to 5pm on 9 December to accommodate a response from GCSP.

## RESPONSES

Responses to the consultation are summarised below.

Written responses were received via:

- MS Forms: 12 webforms were completed and submitted.
- Email: 3 responses including a combined response from the Greater Cambridge Shared Planning service, received 9 December 2025.

In addition to the above we have confirmation of the following intranet hits:

Web Page views: 98

News Article views: 216

Webinar Article views: 199

Webinar views: 48

## REVIEW

Responses to the consultation have been received in a two formats, as indicated above. These have been collated and are detailed below along with comments where pertinent.

Overall, responses indicate that the Urban Forest Strategy has been well received with majority of consultees supporting the approach. Some very helpful suggestions and recommendations have been made to improve clarity, standardise terminology and correct typographical errors. In addition we have received a few comments that indicate a

misunderstanding of the text. These are addressed in detail in the tables and list at the end of this review.

The below list summarises comments made.

- Improve clarity of some statements
- Improve navigation through documents
- Additional links are required to referenced documents
- Additional references to source documents are required
- Preferred terminology, e.g. Development Management not Control
- Potential Resourcing implications
- Canopy cover assessment background data
- Add more research data

Most of the requested amendments have been actuated and are continuing to be processed. Where comments indicate a misunderstanding of the text, the strategy wording has been edited to reduce the potential for misinterpretation.

Links to external references have been added as requested but links to internal documents cannot be addressed until documents are finalised and the required pathways are fixed. All links and referenced will be checked prior to final publication.

The Tree Team at this stage would like to thank all individuals, teams and services who took the time to respond to the consultation; the constructive feedback received has been invaluable in refining the Urban Forest Strategy and improving its clarity, robustness and accessibility.

## **RISK**

The Urban Forest Strategy has been prepared to aid the protection and expansion of Cambridge's tree canopy and to ensure that the benefits are accessible across all communities and future generations. To accomplish this, the strategy needs to be achievable, clear and accessible. It has been prepared to give direction, guidance and support and provide evidence to justify decision making.

The primary objective of the internal consultation was to test deliverability, resourcing implications, legal/governance risks and to ensure alignment with other policies. Responses to the consultation indicate that no risks to these criteria are associated with the current document, but that minor amendments will improve clarity and usability of both the strategy and the associated topic papers.

## **PUBLIC CONSULTATION APPROVAL**

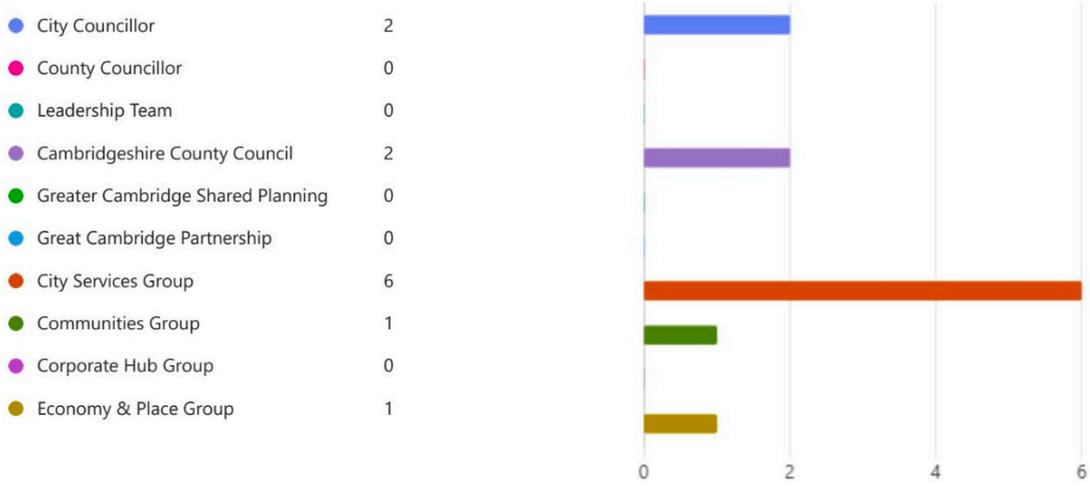
Authority to proceed to public consultation was delegated to the City Services Director by Cabinet in September 2025. The next step in the process is to commence public consultation. In this regard, we request authorisation to amend the UFS and referenced topic papers as

detailed below, and proceed to public consultation in January alongside the Biodiversity Mid-Strategy review.

## WEB FORM RESPONSES

The MS Forms comprised of a series of multiple choice questions set round relevance to service, document structure and pathfinding, clarity of the strategy and its topic papers and the deliverability of the vision. The overall response was very positive.

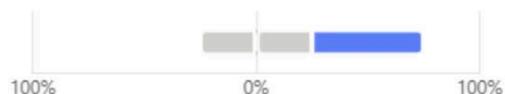
### THE BELOW CHART SHOWS WHICH GROUPS RESPONDED.



### THE FOLLOWING CHARTS DETAIL THE PERTINENT MULTIPLE CHOICE QUESTIONS AND SUMMARISES THE RESPONSES.

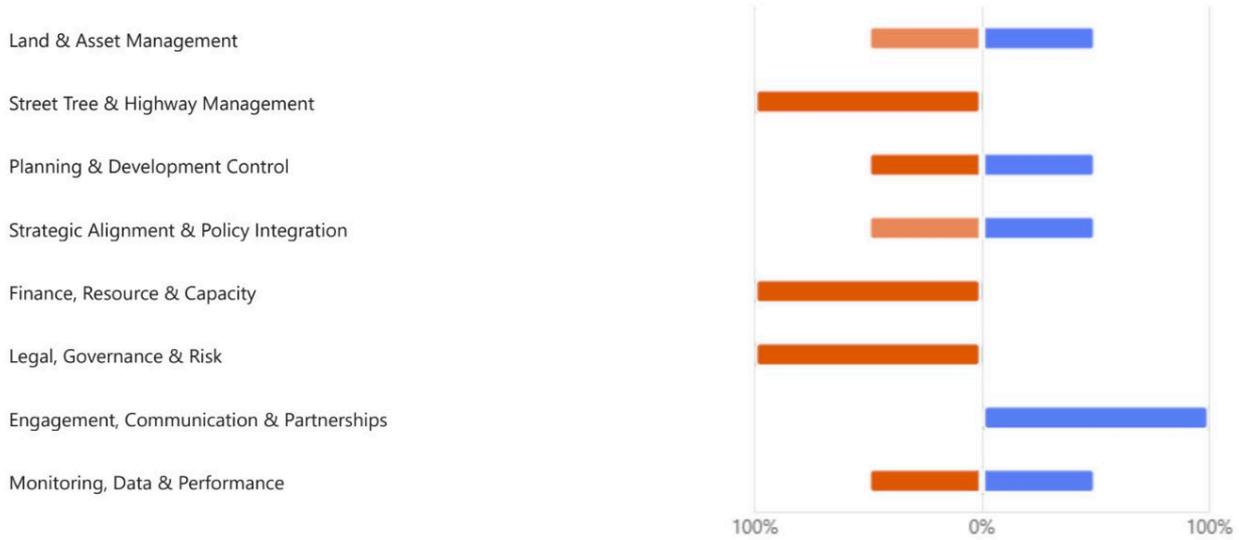
8. How familiar were you with the old Tree Strategy 2016-2026 before this consultation?

- Not at all
- Slightly
- Somewhat
- Mostly
- Very familiar



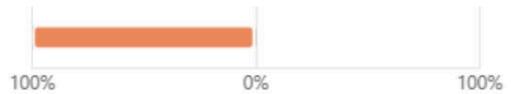
9. How relevant are the following themes you selected to your service?

● Not relevant ● Somewhat ● Mostly ● Very relevant



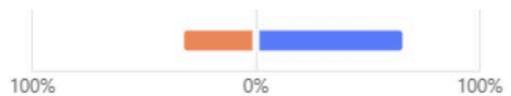
11. Did the consultation themes make it easier to locate and review the sections of the UFS and Topic Papers relevant to your work?

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree



12. How relevant are the UFS and Topic Papers to **your area of work**?

● Not relevant ● Somewhat ● Mostly ● Very relevant



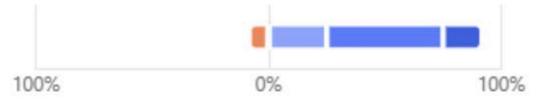
13. How clear are the UFS and Topic Papers in helping you understand the relevance of the urban forest to **your area of work**?

● Not clear ● Somewhat ● Mostly ● Very clear ● Not relevant



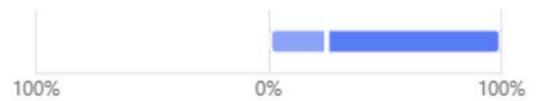
14. How confident are you that **your service** can contribute to delivery of the UFS's aims?

● Slightly ● Not confident ● Somewhat ● Mostly ● Very confident ● Not relevant



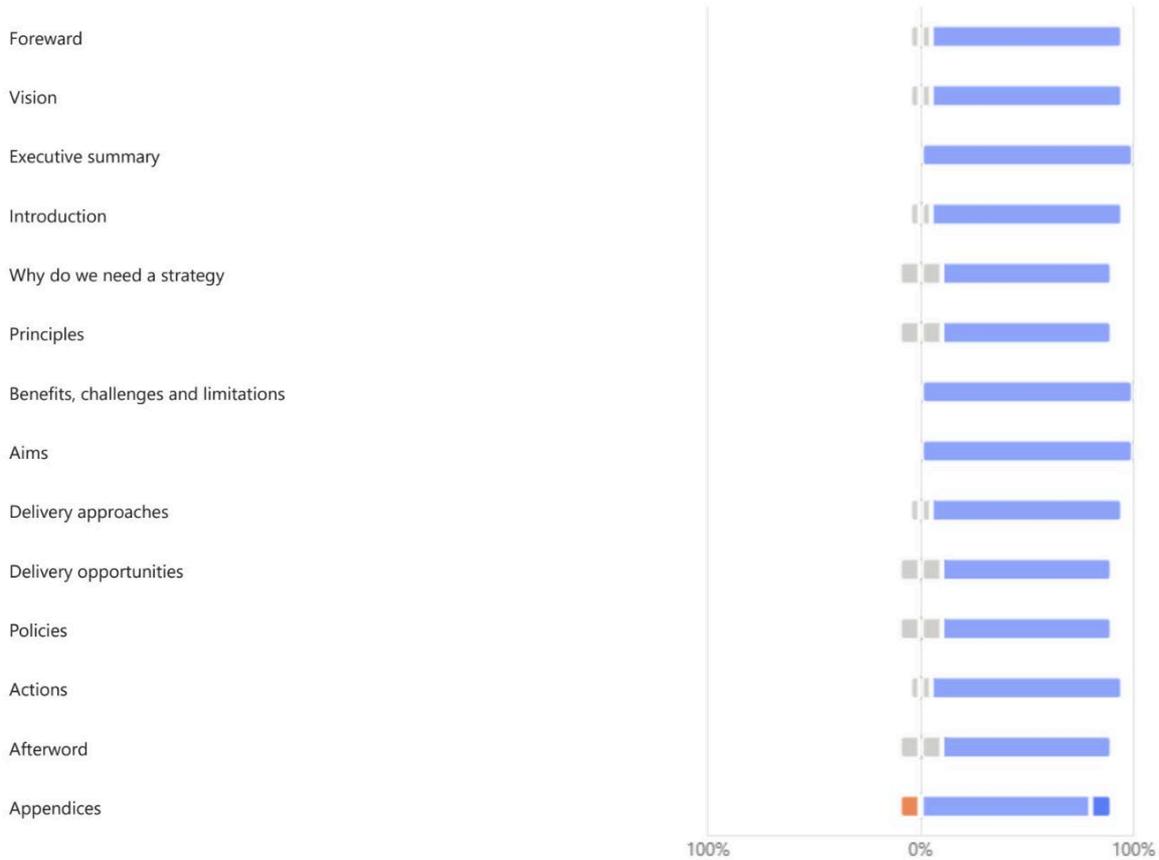
15. **Regardless of your area of work** how clear did you find the aims and purpose of the UFS and Topic Papers

● Not clear ● Somewhat ● Mostly ● Very clear



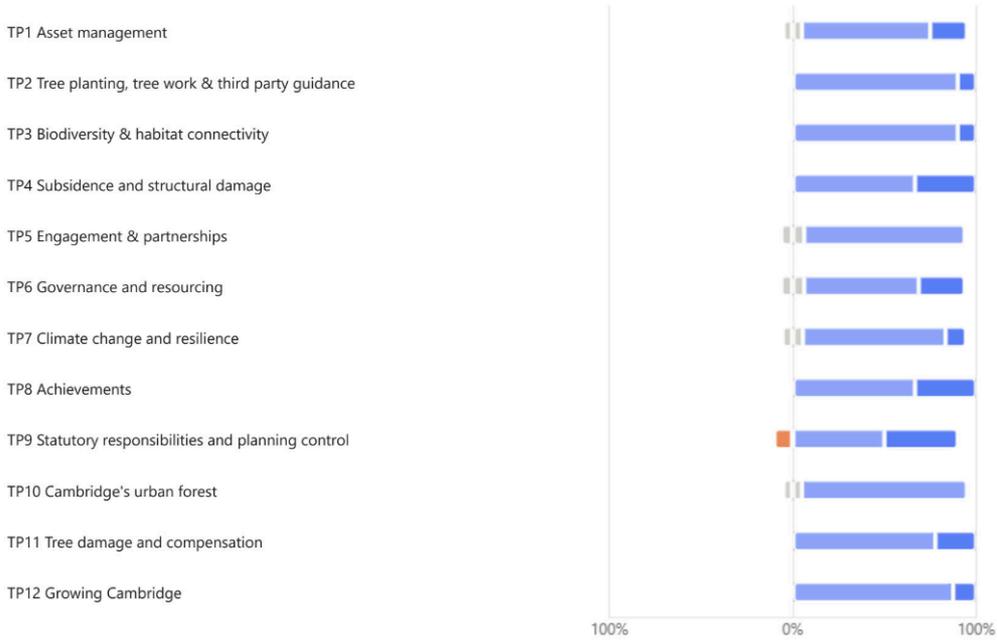
17. Use this section to highlight where the UFS are strong or need clarification. Ratings help us identify which parts of the UFS may need revision before public consultation.

● Not clear ● Somewhat ● Mostly ● Very clear ● Not relevant



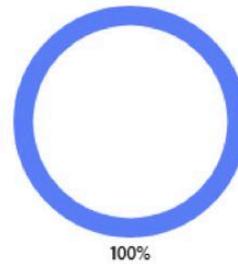
19. Use this section to highlight where Topic Papers strong or needs clarification. Ratings help us identify which Topic Papers may need revision before public consultation.

● Not clear ● Somewhat ● Mostly ● Very clear ● Not relevant



21. Do you support the overall direction and priorities of the UFS?

● Yes 12  
 ● No 0  
 ● Partially 0



In addition to the multiple choice questions above, four themed opportunities were provided for additional comment. The below tables cite the questions and comments and set out the team's response.

**PLEASE PROVIDE ANY OTHER COMMENTS ON THE CLARITY, RELEVANCE AND ACHIEVABILITY OF THE UFS AND SUPPORTING TOPIC PAPERS**

COMMENT	RESPONSE
<p>I found the UFS and topic papers clear yet powerfully written. They are both thorough yet succinct, this will make their interpretation and application far easier for those who it is relevant. Regarding achievability, I believe it is a very pragmatic body of text, stating what is achievable given our current level of resources and how we will use those resources to achieve all our aims.</p>	<p>This is a positive response to the UFS that does not require change</p>
<p>It might be helpful to have a form of flow diagram or similar at the top of relevant pages to show how each sections connects to each other. E.g. Vision - principles. Policies - Actions.</p>	<p>A flow-chart will be added to 'How the Strategy Work' section</p>
<p>This sets out a vision and guidance as well as an approach to my day to day working. It is an essential policy for the tree team. This is a natural progression from the last tree strategy. I think the new UFS is very achievable as it simply advances our stride to managing the Cities trees wholistically by working with the public and landowners as well as our own tree stock.</p>	<p>This is a positive response to the UFS that does not require change</p>
<p>Cambridgeshire County Council Public Health are pleased to see reference that trees are critical infrastructure help to improve public health in the foreword. In the Why section, public health are pleased to see the acknowledgement that a lack of trees and canopy cover leads to climate change issues, high rates of chronic illness and increased pressure on healthcare, and low rates of community interaction. We are also pleased to see that acknowledgement has been made to the inequality in the distribution of canopy cover. In TP7 public health were pleased to see the reference that inaction (e.g., not increasing canopy cover) could lead to threats to human health, food and water insecurity and poverty and displacement. In TP12 public health are pleased to see that the quality of the canopy cover is more important that quantity as larger trees have the capacity to cool and shelter an area more than many small trees. Maintaining and increasing good quality tree coverage is important for wellbeing and human health in terms of improving the visual amenity of an area, improving air quality, cooling and shading.</p>	<p>This is a positive response to the UFS that does not require change</p>

I understand why, but the main UFS is very long and there is a lot of repetition of the aims and goals. There was not always a clear link between aims and delivery opportunities and some sections could maybe have been reorganised or numbered in line with the aims. No issues with relevance or achievability	In line with additional comments received on this topic, amendment have been made to improve the narrative and pathfinding.

**DO YOU HAVE SPECIFIC COMMENTS, OMISSIONS, OR OVERLAPS YOU WOULD LIKE TO FLAG REGARDING ANY UFS SECTIONS**

<b>COMMENT</b>	<b>RESPONSE</b>
<p>I felt we could add more statistics from the iTree Eco study earlier in the UFS ( I believe there was only the £1 billion pound statistic in the afterword). Though I do acknowledge the stats are within the topic papers such as the runoff mitigation statistic within topic paper 7. I feel this way as I believe the UFS will be the most widely published and read, I feel these stats really advocate for trees and put a high value what they do and how they benefit the city.</p> <p>I could not find anywhere which states how often the UFS will be reviewed or how long it will stand for exactly.</p>	<p>It is agreed that additional data will aid justification of the approach especially with regard to Proximitree™ and breaking down the ADAS report further.</p> <p>The UFS will be reviewed at 10 years. While progress will be monitored annually through KPIs, some of the most important canopy metrics particularly changes in canopy cover—can only be reliably assessed over longer timeframes. Tree growth, establishment and loss occur gradually, and shorter assessment periods risk producing misleading results. A 10-year review therefore provides a robust and proportionate timeframe to assess meaningful change, supported by the most up-to-date canopy mapping and evidence, while annual monitoring ensures delivery remains on track in the interim</p>
It is very important that the UFS is confirmed in time to be added to policy BG/TC of the proposed local plan so that it can be taken into consideration as part of this policy in the future. (eg para 5.42, p459 of Appendix A).	Agreed
It might be helpful to number the four themes under delivery opportunities to keep it clear that those are the four points you are	Agreed and this has been done

<p>referring to, as there are many subtitles. Also, "These four themes above..." might make it more clear.</p> <p>On page 13, under Biodiversity and Habitat, the addition of the CNN could be beneficial "Even individual street trees contribute by linking fragmented habitats and creating stepping stones for wildlife across the urban landscape - contributing to the wider Cambridge Nature Network and following the Lawton Principles."</p> <p>On page 22 and 38, where the DiversiTree project is mentioned, I think it is beneficial to include that a large part of this project is also delivering substantial community engagement opportunities.</p> <p>Principle 3 - be bolder - replacement of trees where works and removals are needed - NOT with saplings or whips... myself and many others including residents are frustrated by the replacement of trees with saplings within new housing developments. We should be asking for trees that are stronger and 3-5 yrs old, so they survive . We should also be firmer in holding developers to account when saplings fail due to poor watering and care.</p> <p>Principle 4: What is the ask for additional resource to have a greater focus on this - whilst its ambitious plan, i can't see how you can deliver this on existing resource.</p> <p>The language used between policies and the principles is very close - and its difficult to see how they are distinct.</p> <p>Never seen an afterword before (I guess it is basically a conclusion?). Interesting info in it. If other UFS's have it, then fine. In appendices, the Spacing feels a bit dense. Not kind to the eyes.</p>	<p>Agreed and this has been done</p> <p>Community engagement add at pg 22.</p> <p>The UFS has limited power in the this regard, it is a non-statutory document, so it cannot create enforceable obligations or financial requirements for developers beyond the local plan which provides for conditions that give greater control.</p> <p>Public engagement is not new. We have numerous successful public engagement projects as set out in Topic Paper 5</p> <p>The principles and linked through aims and approaches so, yes the language is similar.</p> <p>The Foreword and Afterword are intended to frame the UFS, setting the context and reflecting on the wider story of Cambridge's urban forest. They use a more accessible and narrative tone to complement the technical content that follows, helping the document speak to a wide audience. Together, they bookend the Strategy, providing an entry point and a point of reflection, while the core sections set out the evidence, policies and actions that guide delivery</p>
<p>Very well considered and put together strategy.</p>	<p>This is a positive response to the UFS that does not require change</p>

<p>Just to state that Cambridgeshire County Council are looking to map canopy cover and hedge cover (less relevant) for the entire county in early 2026 - so there would be potential to use maps and data from this exercise if needed. We will send round the request to tender so if there are any additional needs these may be included.</p> <p>Support may be possible for tree planting and public engagement on tree cover from the county council if needed from the new woodland creation project. Looking at a call for sites and identifying appropriate areas for planting with fits together with the UFS aims.</p> <p>Also investigating the feasibility of a community tree nursery which could also help support UFS aims.</p>	<p>A joint project between County, SCDC and CCC would be very worthwhile, so yes please keep us in the loop.</p>

**DO YOU HAVE SPECIFIC COMMENTS, OMISSIONS, OR OVERLAPS YOU WOULD LIKE TO FLAG REGARDING ANY TOPIC PAPERS**

<b>COMMENT</b>	<b>RESPONSE</b>
<p>Very well written with great rationale behind each topic paper.</p> <p>One adjustment I would like to see is to change the title of the PDF so the topic is clearer before being downloaded/opened, for example instead of: urban-forest-strategy-topic-paper 1.</p> <p>It should instead be - urban-forest-strategy-topic-paper 1 Asset Management</p>	<p>This is positive response to the UFS that does not require change</p> <p>Agreed, this will help will pathfinding</p>
<p>I think that the UFS needs to recognise the importance of smaller /lower value trees but which are sited in denser urban areas and therefore may be the only greenery in between many houses, often without front gardens (eg Market or Petersfield wards). Whilst these may not be Cat A trees, they provide vital breaks in urban density and provide amenity to sometimes hundreds of small terraced houses in the area.</p> <p>I would also like to see a clear request for proper information for any request to undertake tree works in the Conservation area or on TPO'ed trees. Whilst I appreciate that it is not a statutory requirement, guidance asking for photos, indication of the problem - eg where the damage is, what caused it and whether a replacement is proposed (even if not required) and what this would be would be very helpful. It is evident that many applications, including those to fell, are put in by companies who do not always understand that residents/neighbours and the LPA need decent information to understand the situation and to assess it properly and that felling a tree in the urban streetscape has greater impacts that</p>	<p>Agreed, text has been added to highlight the importance of considering amenity in context</p> <p>The UFS has limited power in this regard, it is a non-statutory document, so it cannot create enforceable obligations.</p>

<p>falling one of many in a less urban environment. Providing more information would also help reduce neighbour objections if it is clear about reasoning and any replacement and therefore make decision making faster.</p> <p>I would also suggest that we add a link in from the GCSPS application forms for tree works, linking to the UFS policy about this. I would also like the UFS or City website to include an example of good practice for an application (eg with clear photos, site plan, indication of reasons and details of planned replacement).</p>	<p>Recommendations are set out in TP9</p> <p>There is a link to the application form. The hyperlink pathways will need to be updated.</p> <p>This is supported by CCC but would need to be hosted by GCSP</p> <p>We will pass these comments on to GCSP for consideration</p>
<p>I'm not sure if all of the Topic papers are intended on being kept when consulting externally and adopting the UFS?</p> <p>There is a lot of information here - realistically, I 'm not sure how much the 'average person' will read, but I can see this being helpful for individuals and groups/orgs who are already vested in this agenda.</p> <p>Might be worth thinking about a summary document for the average person with links to the details if they want to know more.</p> <p>There was a number of things in the achievements and current projects info that i wasn't aware of - so on reflection this feels as though there is more to do on internal comms and joint, cross departmental working - particularly in reference to community engagement</p>	<p>Yes</p> <p>The strategy has been separated into a core document supported by topic papers in an attempt to streamline the core document. The topic papers allow the reader to delve deeper into areas of greatest interest.</p> <p>Yes, good internal and external communication is essential to successful delivery.</p>
<p>My main comments relate to somehow feeling that topic 7 was a little generic in content and didn't really offer much extra value in terms of being able to quantify the actual local impacts and improvements in relation to the UFS and its delivery, should Cambridge be aiming for targets within this? Maybe this isn't the place to put it because then it defines the opportunity too greatly but just a thought on what this topic paper clarifies in relation to Cambridge specifically beyond just the existing position.</p>	<p>TP 7 is intended to provide context and justification, rather than to introduce additional targets or metrics. Its role is to explain, using Cambridge-specific evidence notably i-Tree Eco data, how the urban forest contributes to climate change mitigation and adaptation, and why this underpins the UFS.</p> <p>Topic Paper 12 considers the future position in more detail</p>

## ANY OTHER COMMENTS OR RECOMMENDATIONS NOT COVERED ELSEWHERE?

COMMENT	RESPONSE
<p>There was a number of things in the achievements and current projects info that I wasn't aware of - so on reflection this feels as though there is more to do on internal comms and joint, cross departmental working - particularly in reference to community engagement</p>	<p>This is a positive response to the UFS that does not require change</p>
<p>Tackling the private sector engagement issue, a suggestion to introduce a council tax relief bracket (something minimal of a few percent) applying to properties where there are a minimum number of healthy, maintained, tall trees (having a height threshold prevents this from becoming a surge to plant and not care for the trees only to benefit from tax relief), aiming to incentivise the private sector into going greener. As a large portion of the properties in Cambridge are rentals, this would likely be well received by landlords as they will be able to advertise accordingly, having an edge in the market due to reduced council tax on tenants. With the owners having to fulfil a certain requirement to qualify for reducing an expense, the engagement is likely to skyrocket so as to not miss out, at the same time minimising the labour and expenses on the council's behalf.</p>	<p>While this is an interesting proposal, it is beyond the influence of UFS</p>
<p>In the latest 2025 transformation the replanting budgets for our estates has been cut in its entirety. We will therefore not be renewing any of the shrub beds which will impact biodiversity. Areas will be returned to grass. No biodiversity connecting corridors to ling habitats with hedgerows and trees. Another significant impact is the new builds. The mature trees from the open spaces are removed and replaced with larger developments. A green roof doesn't support as much biodiversity as a mature tree so there is always a significant loss. large numbers of the trees that get planted on estates never make it to maturity as the developers don't water them in the first year or they are very small and are vandalised. So again as the trees never reach maturity it is a continual erosion of the forest canopy in the city. Naturally we build on the estates that have the largest open spaces so we can squeeze as many properties in as possible. The two are naturally at odds with one another.</p>	<p>Strategic planting is essential to a healthy urban forest. Providing appropriate, protectable, space allows fewer large copy trees to be planted and retained through future development, ensuring that trees can mature to provide the their maximum benefits.</p>

## EMAIL RESPONSES

In addition to the MS Form responses, comments have been received via email. The comments, context and responses are set out in the tables and lists below.

UFS PAGE	RELEVANT TEXT	COMMENT	RESPONSE
6	The strategy has been developed alongside and with consideration of national and local planning policies and other key environmental strategies including...	No references or publication dates for any policy/docs. Suggest including so it is clear which policy/docs have informed strategy (noting they some referenced later in document but would be clearer if referenced as list/where first they are referred to).	Changed cited documents format to a list. References to be added
7	History of Urban Forestry- “ Throughout the document links are provided to maps, research papers, data sets and topic papers to allow the reader to delve deeper into areas of particular relevance or interest”	Topic papers are not just for relevance/interest but should/provide supporting evidence the policies. Consider re-wording this sentence and clearer signposting within policy to supporting TP.	Strategy edited to include this point. Signposting will be addressed with links when pathways to internal documents can be fixed.
9	National Policy (NPPF) ‘The planning system should support the transition to net zero by 2050 and take full account of all climate impacts.’ National Planning Policy Framework, para. 161 ‘New development should...: a) avoid increased vulnerability to the range of impacts arising from climate change... b) help to reduce greenhouse gas emissions.’ National Planning Policy Framework, para. 164	None. But to note new NPPF due out before Christmas 2025, so will need to cross reference to this when published.	Reference will be updated when 2025 NPPF published.
11	With an uneven distribution of trees throughout Cambridge the proactive preservation of existing trees and new planting needs to be prioritised in areas with lower canopy cover	In practice not possible i.e. where a site has significant ecological, historical, landscape or operational reasons to justify alternative to tree planting (see- Draft GC LP policy-if scheme demonstrates above reasons to justify a canopy requirement of less than 30% on site then policy allows for an alternative percentage of canopy provision to be agreed with the LPA.)	5 Principles found the UFS and guide the approach. The comment relates to Principle 5, which is aimed at environmental justice. The principle does not convey a commitment to plant irrespective of other planning considerations but to prioritise protection and new planting in low canopy areas and in line with the Draft Greater Cambridge LP policy.

<p>13 (and 22)</p>		<p>Flood Risk and SuDS Opportunities- “ <i>We do not yet have a detailed flood risk and canopy overlap assessment.</i>”</p> <p><b>Q:</b> Will CCC be undertaking this assessment? Flood risk assessments and tree canopy overlap assessments are important to understanding the impact of tree cover on flood risk management but perhaps need to be clearer as to how/ when assessment would be done and used for implementation. ‘Stormwater attenuation’ section (pg.13)- consider clearer link to topic paper flood risk/SUDs &gt; perhaps link to <a href="#">National standards for sustainable drainage systems (SuDS) - GOV.UK</a></p>	<p>Link to Topic Paper 7 to be included in UFS when pathways are fixed. Link to <a href="#">National standards for sustainable drainage systems (SuDS) - GOV.UK</a> added to TP7</p> <p>A more detailed dataset linking tree canopy, flood risk and SuDS is aspirational and could be developed subject to resources, potentially with partner organisations. Over time, this would help target tree planting, retention and protection where it can most effectively support flood risk management.</p>
<p>17</p>	<p><b>Policy Gaps</b> Not all tree related decisions are governed by clear policies. For example, there is currently no Citywide canopy cover target adopted in planning policy. While policy 71 of the local plan considers trees on development sites, there is currently no citywide policy regarding the management of protect trees.</p>	<p>make clearer in subheading/ paragraph so it is obvious that referencing planning policy.</p> <p>What does ‘no citywide policy regarding the management of protect trees’ mean? Is this referring to trees of amenity value&gt;TPOs?</p> <p>Can the strategy reference the draft LP emerging preferred approach?- which is to apply a tree canopy cover target for a site, in order to support the delivery of the area-wide ambition of 20% tree canopy cover (ahead of the Proposed Submission stage, the Councils may also explore the implications of applying an alternative policy approach of requiring a canopy cover percentage increase)?</p> <p>20% for Greater Cambridge seems reasonable figure but for Cambridge City a technical report ‘<a href="#">Valuing the Urban Forest of Cambridge</a>’ (2020-2021) was produced (as part of the Interred Nature Smart Cities 2 Seas project) in order to help plan and manage the city’s urban forest. The report found</p>	<p>Done</p> <p>Protected trees are those with TPO, in conservation area or subject to planning condition. There is currently no policy governing how these are managed. Highlighting these limitations is aimed at reinforcing the need to allocate resources when available and to seek investment.</p> <p>Yes, UFS has been updated to reflect the draft GCLP ambition.</p> <p>Different canopy figures reflect different methods and purposes. The evidence base and rationale for using ProximiTree aerial mapping consistently to set and track targets, alongside i-Tree Eco to value ecosystem benefits, are set out in Topic Paper 12 How we measure canopy. Topic Paper 10 provides the baseline context.</p>

		<p>that Cambridge tree canopy covers about 20.1% of the city (13.3% trees and 6.8% shrubs). = Cambridge’s latest mapping point is 20.1 % canopy (2021) by this evidence. What is reason for not referencing this document? and in this context, the proposed uplift target of 20% by 2050 for the Greater Cambridge area as a whole is considered to be appropriate but for Cambridge is less than 2021- perhaps strategy should look at narrative of this in terms of overall GC area(?)</p> <p>Note: the Strategy sets citywide canopy cover 20%&gt; the Draft GCLP emerging preferred approach is to apply a tree canopy cover target for a site, in order to support the delivery of the area-wide ambition of 20% tree canopy cover (LP GI Strategy proposes Urban Tree Canopy Cover across the Greater Cambridge area increased to a target of 20% by 2050 from current baseline) = is in alignment with draft LP.</p>	<p>Internal improvement note (TP10)</p> <p>Topic Paper 10 should be updated to include a short qualification in the Canopy Cover section clarifying that i-Tree Eco canopy estimates are not used as the headline baseline for target-setting, due to methodological differences, but are used to quantify ecosystem services.</p> <p>The ambition is the same across both the UFS and draft GCLP so the documents are in alignment, it is not clear how the site by site % will be worked out in the GCLP. But the UFS is not that specific. The principle is plant more and protect more and the canopy will automatically increase as a result</p>
19	<p><b>Aim 4:</b> Embed trees and canopy into policy and decision-making. To ensure trees are considered at all levels of planning and design, from infrastructure and development to climate and public health policy. Supporting Awareness and Action, Climate Resilience principles</p>	<p>What does this mean?</p> <p>‘Trees’ are already embedded into policy and decision making (statutory responsibilities/duties)</p> <p>Decision making= DM. TP 9,pg.10(?)-"An applicant should ensure that tree constraints information is established at an early stage of proposed development to ensure trees of value inform design layouts"- need to discuss the process as not current approach.</p>	<p>Much of the policy covers systems that are already in place. This is the commitment to do so and continue doing so.</p> <p>This is advice to an applicant and is current best practice (BS5837 2012). It is aimed at ensuring trees of value are a design considerations and their assessment is not just a tick-box exercise. Tree Constraints information is generally circulated to the design team and not submitted to the LPA as part of any detailed application. It is however valuable</p>

		‘Canopy’ – What? ‘preserve and enhance canopy cover? – somewhat duplicates/repeats Aim 1: Increase canopy cover?	information to aid the LPA in preparing pre-app advice.  Canopy cover.  Aim 4 is to aid Aim 1 by ensuring policy supports it.
22	Strategic decisions about where to protect or grow canopy	What are these strategic decisions?  Will such decisions be informed by canopy cover assessments so ‘strategic approach’ =”evidence-led action, shared responsibility, whole-place thinking and equitable outcomes “ not specifically defined	(Page 25) Where to plant and protect trees.  Datasets tell us where canopy is lacking allowing strategies to focus canopy cover delivery in those places.  This statement comes under Delivery Opportunities and specifically the tools and data used to plan, prioritise and track work. Our canopy cover assessments allow us to track patterns and prioritise action where it is needed and where resources allow.
25	Planning and Development Partnerships- We will work with the Greater Cambridge Shared Planning service to ensure the Local Planning Authority’s statutory tree protection responsibilities are aligned with the vision, principles and aims of this strategy	GCSP is joint service for LPA (SCDC and CCC)= is this para needed? Suggest remove. The LPAs are working as the GCSP to ensure LPAs statutory tree protection responsibilities are carried out (TPOs, CA, public consultations, legal liability-compliance with legal restrictions)	CCC is the LPA and therefore ultimately responsible. GCSP provides the service in accordance with CCC statutory responsibilities. The statement is a commitment to work together in accordance with the holistic, urban forestry approach.
25	Planning and Development Partnerships- We will work with the Greater Cambridge Shared Planning service to ensure the Local Planning Authority’s statutory tree protection responsibilities are aligned with the vision, principles and aims of this strategy	Is this para needed?  GCSPS is the joint service for the Council - we are not a partner!	CCC is the LPA and therefore ultimately responsible. GCSP provides the service in accordance with CCC statutory responsibilities. The statement is a commitment to work together in accordance with the holistic, urban forestry approach but

			the word Partnership is not essential to the statement and can therefore be removed.
25	share data and develop accessible mapping tools	Can this approach be utilised to provide data for baseline tree canopy cover for South Cambs? (currently not available) >this would provide supporting evidence for draft LP policy overall canopy cover target.	The commitment to share data and develop accessible mapping tools relates to datasets and tools held by Cambridge City Council and therefore applies to the Cambridge City administrative area only. The approach could, however, be used as a model to develop similar mapping and reporting tools for South Cambridgeshire. To do so would require the procurement of appropriate underlying datasets for South Cambridgeshire (for example, aerial canopy mapping), which are not currently held by Cambridge City Council.
26	<b>Tree Protection</b> We will continue to report annually on the number of trees protected by TPO and tree work applications assessed. Available from Tree data - Cambridge City Council We will seek opportunities to improve enforcement of replacement planting <u>duties</u>	Would like to discuss how we can improve enforcement of replacement planting. Additional resources are likely needed.	CCC is committed to aiding all services to deliver the strategy. This statement is aspirational and not a commitment to use existing resources but to look for opportunities to improve these essential functions.
28	POLICY M3 Trees, Damage and Subsidence: Tree-related damage mitigation requests and claims will be managed in line with nationally recognised guidance, ensuring decisions are based on robust evidence and a hierarchy of mitigation. Priority will be given to retaining trees wherever possible, with alternatives such as pruning, root barriers, or engineering solutions considered before removal. CCC will work with insurers, their engineers, arborists and residents to ensure fair outcomes that balance property, environmental, reputational and financial risks.	Legal will need to be consulted on liability/compensation	This a manage more policy related to the management of council assets that legal (internal and external) have been consulted on

<p>29-30</p>	<p>Protect More: The Town and Country Planning Act 1990 and The Town and Country Planning (Trees Preservation)(England) Regulations 2012 make provision for the protection of trees of value through the serving of Tree Preservation Orders, making local planning authority approval a prerequisite of any tree works. With the use of these regulatory powers The Council and partner services will seek to preserve and enhance trees of value and canopy cover, primarily on private land.</p> <p>With consideration of National Planning Policy Framework, Planning Practice Guidance and The Cambridge Local Plan, through development control, through the Greater Cambridge Shared Planning (GCSP) services, CCC will seek to ensure new development protects and enhances the urban forest.</p>	<p>Our main focus, remains with PA, not trees of value (too vague)</p> <p>Which partner services are being referred to?</p> <p>NB Throughout the UFS please replace all reference to ‘Development Control’ with Development management’ (development control is a very dated term that is not used by Councils these days)</p>	<p>Changed to trees with sufficient amenity value</p> <p>Changed to GCSP</p> <p>Deleted or changed to Development Management</p>
<p>29-30</p>		<p>“... trees of value and canopy cover, primarily on private land.”</p> <p>Q) Is this referencing preserving/enhancing canopy cover for large species trees- if so then it is one part of assessment of amenity value- so why distinct reference to this aspect?</p> <p>Suggestion: remove ‘primarily on private land’ and consider ‘on both council owned/public land and private property’ - the preservation /enhancement of whole urban forest is golden thread and TPOs applicable to both public/private land...</p>	<p>No. preserve trees of value and preserve canopy cover</p> <p>While urban forestry is the golden thread, the suggested alteration is open to interpretation and creates an unnecessary expectation regarding TPO protection for council trees. While there are circumstances where TPOs are necessary for council trees, (typically where common law rights would allow work not authorised by the council) local authorities are regarded as responsible tree managers so TPO are not required.</p>

		<p>Phrasing: (CCC is LPA and SCDC is LPA= the GCSP is the joint service for both councils). Look at this paragraph wording to reflect in practice application of policy: DM is part of GCSP not isolated from it. This needs re-wording.</p>	<p>The statement now reads "...to protect and enhance trees of sufficient amenity value and preserve canopy cover, where expedient.</p> <p>Removed specific reference to development control (management)</p>
	<p><b>POLICY P1:</b> GCSP will make efficient use of regulatory powers to protect trees of value and secure replacement planting where appropriate. If council owned/managed trees are at risk from development, the CCC's Tree Team will be consulted at the earliest opportunity. GCSP will consider a response to climate change and biodiversity crises as contributing factors when assessing amenity and the expedience of serving TPOs. New structural tree planting forming part of landscape schemes implemented with development proposals will be made the subject of Tree Preservation Orders.</p>	<p>We need to discuss how to ensure this happens will the planners know which trees are council owned/ managed?</p>	<p>Internal consultation with asset management tree officers is an historic function that was carried out within City Services. The Tree Team is happy to discuss the best system to maintain this consultation.</p>
	<p><b>POLICY P1:</b> GCSP will make efficient use of regulatory powers to protect trees of value and secure replacement planting where appropriate. If council owned/managed trees are at risk from development, the CCC's Tree Team will be consulted at the earliest opportunity. GCSP will consider a response to climate change and biodiversity crises as contributing factors when assessing amenity and the expedience of serving TPOs. New structural tree planting forming part of landscape schemes implemented with</p>	<p><b>AMENITY ASSESSMENT:</b> The Urban Forest Strategy does include method for assessing amenity value (in TP9) but P1 highlights 2 factors in particular " <i>will consider a response to climate change and biodiversity crises as contributing factors when assessing amenity</i>"&gt; These are 2 factors of previous amenity criteria (which is carried fwd in the new strategy) but should strategy not cross refer to Topic Paper 9 method of assessment which sets out <b>all</b> the criteria to be considered?</p>	<p>Agreed. P1 has been updated to reflect.</p> <p>The GC draft LP- policy BG/TC " <i>Trees, groups of trees and woodland will be assessed by the Councils in accordance with the amenity assessment (Policy P2) <a href="#">Cambridge City Councils tree strategy (2016-2026)</a> or successor document.</i>"</p>

	<p><b>POLICY P2:</b> The Council will resist the removal of or excessive works to trees without robust and evidenced justification. TPO applications submitted without sufficient evidence to justify work specified will not be validated. The removal of or significant works to healthy trees in conservation areas will be resisted without the submission of justification for work proposed</p>	<p>We will be guided by the advice provided in the new blue book.</p>	<p>Blue book was replaced by Planning Practice Guidance (PPG) in 2014. Policy P2 is in accordance with the PPG.</p>
	<p><b>POLICY P2:</b> The Council will resist the removal of or excessive works to trees without robust and evidenced justification. TPO applications submitted without sufficient evidence to justify work specified will not be validated. The removal of or significant works to healthy trees in conservation areas will be resisted without the submission of justification for work proposed</p>	<p>Query- 'to trees' =trees of amenity value (TPOs)?</p> <p>CCC LP policy = "Development will not be permitted which involves felling, significant surgery (either now or in the foreseeable future) and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees." OK= as LP policies take priority where they apply.</p>	<p>This policy relates predominantly to trees protected by TPO or conservation area location. A TPO application is separate from a planning application. The LP policy is only obliquely pertinent. But even so there is not conflict. Policy P4 is more pertinent to Development Management.</p>
	<p><b>POLICY P3:</b> The Council will pursue enforcement action/prosecution where protected trees are damaged or destroyed without consent. Where private trees are removed without consent, penalties will be sought in accordance with current legislation.</p>	<p>This is a very categoric statement and does not reflect the Council's compliance policy which addresses breaches: <a href="#">Greater Cambridge Shared Planning compliance policy</a> Need to discuss wording further.</p>	<p>Added reference to compliance policy under P3</p>
	<p><b>Policy P4:</b> In accordance with section 197 of the Town and Country Act Planning , NPPF and Local Plan planning permission will include appropriate provision for tree preservation and planting. (Page 30)</p>	<p>Is this needed? Does this add anything additional to national/ local planning policy? &gt; TCPA places a general duty on local planning authorities (LPA) to make adequate provision for the preservation and planting of trees in the granting of planning permission.</p>	<p>Much of the UFS is confirming our commitment to work in accordance with various Acts, Policies and best practice. P4 is confirming this commitment with regard to Development Management.</p>

	<p><b>POLICY P5 (Aspirational):</b> CCC and GCSP will seek to review existing TPOs and how TPOs are used. Older and larger orders will be prioritised Area orders will be utilised to protect larger tree collections, and The Council will seek to update every 15 years.</p>	<p>This has implications for resource, and is not feasible within existing staffing levels.</p>	<p>This is an aspirational policy that confirms a commitment, when resources are available. The policy helps to justify seeking additional resources (internal or external) to make service improvement.</p>
	<p><b>Policy PL1 (Aspirational):</b> CCC and GCSP will encourage and continue to seek new opportunities for tree planting in appropriate locations</p>	<p>Species diversity <b>MUST</b> be supported not aspirational. Cannot both 'ensure and encourage'&gt; should ensure this (Topic Paper 2 Tree Planting, Work and Third-Party Guidance supports this). Consider amendment to POLICY PL1 wording.</p>	<p>Agreed and has been amended.</p> <p>Emerging draft LP- Species mix for NEW tree planting. BG/TC point 4) :</p> <p><i>'4. Where new trees are provided, planting must:</i></p> <p><i>a) be of species which are appropriate for the conditions of the site including consideration for climate change, and</i></p> <p><i>b) support species diversity and incorporation of long lived trees within the treescape design</i></p>
	<p><b>POLICY PL2 (Aspirational):</b> CCC will aim to ensure every new planting site is supported by a funded establishment period covering at least the first three years after planting. This will include watering, mulching and early formative pruning.</p>	<p>What is the evidence for a three-year establishment period of aftercare which is recommended as a minimum?</p> <p>Would need to be secured through planning conditions and/or obligations as appropriate, gap in current LP policy to make this implementable.</p>	<p>The minimum three-year establishment period reflects recognised arboricultural best practice and national funding requirements. Forestry Commission grant programmes, including the Urban Tree Challenge Fund and Local Authority Treescapes Fund, require funded aftercare during the establishment period, recognising that newly planted trees are most vulnerable in their early years. The Arboricultural Association advises that newly planted urban trees typically require around 50 litres of water per week during the summer months for at least the first</p>

			<p>three years after planting to ensure successful establishment, particularly as hotter and drier conditions become more common. <a href="#">Tree-Watering-Press-Release-2023-v2.docx</a>. <a href="#">[Withdrawn] Urban Tree Challenge Fund (currently closed) - GOV.UK</a>. <a href="#">[Withdrawn] Local Authority Treescapes Fund (currently closed) - GOV.UK</a></p> <p>It is currently secured through landscape conditions that require management to establishment. This can continue.</p>
	<p><b>POLICY PL4 (Aspirational):</b> The partner services will explore opportunities to incorporate innovative planting techniques such as engineered tree pits, rain gardens and structural soils in new developments and highway schemes to support the establishment of trees in urban conditions.</p>	<p>Which partner services are being referred to?</p>	<p>Any service that has authority connected to tree planting or conditions relating to tree planting.</p>
	<p><b>POLICY PL4 (Aspirational):</b> The partner services will explore opportunities to incorporate innovative planting techniques such as engineered tree pits, rain gardens and structural soils in new developments and highway schemes to support the establishment of trees in urban conditions.</p>	<p>How can GCSPs encourage the incorporation of innovative planting techniques? It is aspirational policy but not clear as to what opportunities support this. Can strategy be clearer as to what these may be?</p>	<p>Policy PL4 is aspirational and is intended to encourage innovation where opportunities arise. These may include, but are not limited to development management (through pre-application advice and planning conditions), City-funded environmental improvement schemes, externally funded projects, and major or minor highway infrastructure schemes.</p> <p>In relation to highways, CCC does not currently have an up-to-date Reverse Agency Agreement</p>

		Also, does CCC have a Reverse Agency Agreement with County Highways for street tree management, maintenance and planting? (link to opportunities for highways schemes).	with Cambridgeshire County Council. The previous RAA expired in 2014, and street tree management has since operated through custom and practice, broadly aligned with the former agreement. Options for a new agreement are currently being explored.
33	Action 4, 1. <i>“Advocate for the inclusion of urban tree standards and canopy targets in local planning policy.”</i>	<p>The GC draft LP standards are based on Natural England’s recommended national “Headline GI Standards” for Urban Tree Canopy Cover. GI emerging strategy, GI standards include Urban Tree Canopy Cover Quantity Standard and Urban Tree Canopy Cover Quality Standard</p> <p><i>’ Urban Tree Canopy Cover across the Greater Cambridge area increased to a target of 20% by 2050 from current baseline. Development achieves a minimum future tree canopy cover of 30% of the site area through retention of existing trees and planting of new trees.” And “ Proposals for increasing and maintaining Urban Tree Canopy Cover reflect good practice tree planting and management GI guidance.”</i></p> <p><i>Already included so Action will be updated to reflect</i></p>	As this is already proposed in the draft GCLP, Action 4.1 has been updated to reflect.
33	Action 4, 3 <i>“ Monitor the implementation of tree-related planning conditions and enforce where necessary and make effective use of regulatory powers”</i>	<p>KPIs do not reference how monitoring/enforcement of planning conditions will be achieved? Resourcing issues with:</p> <ul style="list-style-type: none"> <li>➤ reviewing all of Cambridge’s TPOs,</li> <li>➤ proactively monitoring landscaping conditions and,</li> </ul> <p>serving pre-emptive TPOs on Strategic Landscaping on new developments</p>	Need to set up a system for monitoring compliance with replacement planting conditions, resources allowing.
34	2050s	Should be ‘2050’	Edited

General		<i>forthcoming Local Plan</i> = should be 'Draft Greater Cambridge Local Plan'	Edited
General	ALL Documents - 'Development control'	'Development control' should 'Development management'	UFS Edited check all TPs
General	Partner (services)	<p>Need to look at clarity of explanation of GCSPS as joint service throughout. The Greater Cambridge Shared Planning service (GCSP) delivers statutory planning functions on behalf of CCC who retains legal responsibility, as the local planning authority&gt; policy which references CCC suggest update to 'the council' or 'GCSP' (when directly related to decision/functions of local planning authority) as appropriate. Not: Topic Paper 6. does do this= pg.5 " <i>The Greater Cambridge Shared Planning service (GCSP) delivers statutory planning functions on behalf of CCC who retains legal responsibility, as the local planning authority.</i>"</p> <p><i>Pg.20 " To achieve the aims set out in this strategy, CCC and its partner services will apply four interconnected delivery approaches"= Partner services are not defined but assume this is referring to GCSP (see issue above). N.b 'Partner organisations are listed pg.6 including GCSP should be removed from this list.</i></p>	<p>For the purposes of this Strategy, "partner services" refers to Cambridge City Council services and teams, and to external organisations, that have related roles, interests or objectives in relation to trees, green infrastructure and place-making. Cambridge City Council services will have regard to the Urban Forest Strategy where relevant to their functions. References to partner services reflect alignment of aims and collaborative working, rather than the creation of any new legal, governance or delivery responsibilities beyond existing remits.</p>
31	POLICY PL2 (Aspirational): CCC will aim to ensure every new planting site is supported by a funded establishment period covering at least the first three years after planting. This will include watering, mulching and early formative pruning.	Assume this is proposed to be captured by developer contributions increased to cover longer term maintenance?	P2 is an aspirational policy that does not introduce new mandatory burdens on developers beyond what is already required through existing planning policy and standard development management practice. The Urban Forest Strategy is a non-statutory document, so it cannot create enforceable obligations or

			financial requirements for developers beyond the local plan. Where planting arises through development, establishment funding will continue to be secured through conditions or S106 where justified, exactly as happens now.
--	--	--	---

**TOPIC PAPER 1: ASSET MANAGEMENT**

TP page#	Text	Comment	Response
5	Drainage Land	Change to 'riparian land'. Use as consistent reference throughout the UFS where it is applicable.	Done
18	Consultation	For flood risk we often cannot mimic a typical consultation period if it is deemed urgent/necessary	This is in accordance with urgent tree works, where works can be carried out under delegated powers. Topic Paper 1 has been amended to increase detail regarding tree works required for flood defence.

**TOPIC PAPER 4: SUBSIDENCE**

TP page#	Text	Comment	Response
----------	------	---------	----------

6	<p><b>Protected Trees - Statutory Requirements</b> - Government guidance is clear that, where subsidence or structural damage is alleged in support of works to protected trees, applications must be accompanied by detailed technical evidence. For Tree Preservation Order (TPO) applications, this evidence is mandatory: applications without it are invalid and will be returned. For Conservation Area notifications, while the same evidence is not a statutory requirement, CCC will normally resist removal of or significant works to healthy trees unless robust evidence of this type is provided. Protected trees may be in either public or private ownership</p>	<p>Accept sentiment proposed but will only be able to resist removal of or significant works to healthy trees if tree is worthy of a TPO.</p> <p>Like to discuss approach to TPO in public ownership.</p>	<p>Agreed</p> <p>While this is not directly related to the UFS discussion on this topic between CCC and GCSP is welcomed.</p>
---	--	---	---

## TOPIC PAPER 6: GOVERNANCE AND RESOURCING

TP page#	Text	Comment	Response
2	<p>It establishes the council's vision, aims and policy framework for the urban forest and provides the evidence base (e.g. canopy mapping, amenity valuation, biodiversity priorities) for decision-making.”</p>	<p>Suggest amend to: “ It establishes the council's vision, aims and policy framework for the urban forest and provides the an evidence base (e.g. canopy mapping, amenity valuation, biodiversity priorities) for supporting decision- making.”</p>	<p>Done</p>
4	<p>Trees on drainage land</p>	<p>Change to Trees on riparian land</p>	<p>Done</p>
5/6		<ul style="list-style-type: none"> <li>➤ Why is summary of TCPA section 197 set out whereas other policy not? Does it need to be set out in full?</li> <li>➤ Suggest that ‘GCSP decisions’ is amended to ‘the decision of the Local</li> </ul>	<p>This summary has been amended to include reference to NPPF and current and draft LPs</p>

		<p>Planning Authority on planning applications...”.</p> <p>➤ Remove sentence “ <i>But the local plan policies take priority where they apply.</i>” as preceding sentence makes this clear (as well as the primacy of national policy/legislation).</p> <p>Remove sentence ‘<i>GCSP delivers the statutory planning functions, aligning its procedures with the aims of the UFS, while giving precedence to the local plan in development control.</i>’ UFS is a material consideration. What is meant by “<i>aligning its procedures with the aims of the UFS</i>”- requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise.</p>	<p>Done</p> <p>Done</p> <p>The purpose of this paragraph is to set out responsibilities. The strategy has been amended to achieve this with consideration of the comments. The point now reads “While CCC has strategic oversight of the urban forest, sets corporate policy through the UFS, and manages its own public tree asset, GCSP delivers the statutory planning functions.</p>
--	--	---	--

## TOPIC PAPER 9: STATUTORY RESPONSIBILITIES AND PLANNING CONTROL

TP page#	Text	Comment	Response
3	However, GCSP <b>endeavors</b> to encourage good tree management, particularly through engagement when assessing applications for consent under a Tree Preservation Orde	typo.	Corrected

3	works to fruit trees;	Some/certain works to fruit trees	Agree, description was open to interpretation and has been amended.
3	works by or for statutory undertakers  works for highway operations  works by the Environment Agency and drainage bodies;	Again some works not any works	As above
5-6	<b>Assessment of Tree Work Applications/ notifications</b> (heading)	Nothing under this heading has to do with TWA it refers to making TPOs and goes way beyond any guidance within the blue book. To Note GCSPS has adopted TEMPO system.	‘Assessment of Tree Work Applications/ notifications’ Changed to ‘Amenity Assessment’  CCC never adopted the TEMPO method when undertaking its planning functions. While TEMPO provides a structured scoring framework, its reliance on fixed numerical thresholds and a narrow interpretation of amenity was considered insufficient to reflect local circumstances and the full range of factors relevant in Cambridge. Government guidance advises that local planning authorities should determine what “amenity” means in their local context. In Cambridge, amenity was therefore defined through the 2016 Tree Strategy, and this definition is carried forward in the Urban Forest Strategy. Assessment was consistently undertaken by CCC using a professional judgement-led approach, allowing visual, environmental, cultural, biodiversity, climate and strategic urban forest considerations to be weighed proportionately on a case-by-case basis, rather than through a prescriptive and resource hungry, scoring system.

6	<p>In addition to responding to individual applications and notifications, the LPA may also serve TPOs proactively and strategically where this is justified to protect canopy cover and secure long-term urban forest resilience. Examples include safeguarding important groups threatened by cumulative or incremental development, protecting trees identified through canopy mapping as high-value, and pre-emptively securing new planting where it contributes to canopy targets</p>	<p>Need to discuss as Blue book guidance is quite clear TPOs may be made .. ‘expedient in the interest of <b>amenity</b>’ and mentions nothing about canopy cover etc.</p>	<p>The Blue Book was replaced by Planning Practice Guidance (PPG) in 2014. The PPG encourages LPAs to define amenity, which has been done in Topic Paper 9P</p> <p>‘Amenity’ is not defined in law, so authorities need to exercise judgment when deciding whether it is within their powers to make an Order.</p> <p>Orders should be used to protect selected trees and woodlands if their removal would have a significant negative impact on the local environment and its enjoyment by the public. Before authorities make or confirm an Order they should be able to show that protection would bring a reasonable degree of public benefit in the present or future.</p> <p>PPG Paragraph: 007 Reference ID: 36-007-20140306</p> <p>Revision date: 06 03 2014</p>
6	<p>In addition to responding to individual applications and notifications, the LPA may also serve TPOs proactively and strategically where this is justified to protect canopy cover and secure long-term urban forest resilience. Examples include safeguarding important groups threatened by cumulative or incremental development, protecting trees identified through</p>	<p>No extant policy to support canopy cover retention/increase= no justification to protect canopy cover through TPO’s.</p> <p>Note: Draft GCLP policy for Major Development only: “Only canopy that is delivered (retained or</p>	<p>Canopy cover is linked to amenity value. Public benefits are associated with increased canopy cover as set out in the Amenity Assessment section.</p> <p>The UFS refers to the proactive and strategic use of TPOs, including Category C TPOs, to protect canopy cover and secure long-term urban forest</p>

	<p>canopy mapping as high-value, and pre-emptively securing new planting where it contributes to canopy targets</p>	<p>established) within the application site boundary will be considered canopy provision for the purposes of this policy.” = goes ahead of LP policy for pre-emptively securing new planting contributing to canopy targets.</p>	<p>resilience across the city, not solely on development sites to protect trees beyond the lifetime of a planning condition. This may include safeguarding important groups threatened by cumulative loss, protecting trees identified through canopy mapping as high-value, and securing the long-term protection of newly planted or protected trees under planning conditions. The draft GCLP policy for major development operates at the development management stage, requiring canopy to be delivered within the application site boundary to mitigate the impacts of that development. This should not prevent the wider use of TPOs elsewhere, where justified, to protect canopy beyond individual sites or schemes. The two approaches are therefore complementary: the LP focuses on on-site canopy delivery, while the UFS addresses city-wide, long-term protection and resilience of the urban forest.</p>
<p>7</p>	<p>Future trees to be planted Tree Preservation (England) Regulations 2012, allows TPOs to be applied to trees that are yet to be planted under a planning condition (s197 TCPA 1990). Such trees are identified in the TPO schedule with the letter “C”, and protection takes effect once the tree is planted. This ensures landscaping secured through planning is afforded long term protection beyond the lifetime of the condition itself</p>	<p><b>197 (TCPA) -Planning permission to include appropriate provision for preservation and planting of trees.</b></p> <p>It shall be the duty of the local planning authority—</p> <p>(a)to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees; and</p>	<p>This section is mirrored in the Emerging GCLP policy direction “<i>The councils will protect trees of current and future amenity value through the imposition of TPOs (including the serving of category C TPOs) and/or, through planning conditions to ensure protection and prevent damage during the development process</i>”</p>

		<p>(b)to make such orders under section 198 as appear to the authority to be necessary in connection with the grant of such permission, whether for giving effect to such conditions or otherwise.</p> <p>Can we discuss this. Has this been done to date? Under what circumstances?</p> <p>Need to ensure we are managing expectations too.</p>	<p>This has been used previously. Certain trees to be planted on private land as part of landscape conditions can be protected before they are planted. Information on approved planting plans are used to inform the TPOs.</p>
7	<p>TPO review programme CCC and GCSP will operate a rolling programme to review existing TPOs to ensure they remain accurate, enforceable and proportionate. The review will prioritise older and larger Orders, replace “area” Orders with more precise individual, group or woodland designations where appropriate, and work to a 15-year refresh cycle.</p>	<p>To deliver this additional resources would be required ( an additional Tree Officer and a Technical Support officer) funded by Cambridge City Council.</p>	<p>This is aspirational and will only happen when resources allow. Including it in strategy provides the leverage to seek resources either internal or external (sponsorship) etc.</p>
7	<p>guidance is also provided. Tree work applications must be submitted on the form published by the Secretary of State and include the information requested on the form, a plan identifying the subject tree(s) and location, information necessary to specify the proposed work, reasons for the proposed work and evidence to support structural damage, tree health or safety concerns, as applicable.</p>	<p>Only TPO applications need to be made on the 1App form, and only TPO applications need to provide reasons and supporting evidence. S211 notices don’t.</p> <p>The difference between TPO &amp; S211 needs to be made distinct TWA suggests both TPO &amp; S211.</p>	<p>Correct. In this context ‘application’ refers to TPO application and not to notifications which would refer to s.211 Notices. TP9 has been reworded to make it clear this only applies to TPOd trees.</p>
8	<p>Repeat and phased applications Planning Practice Guidance (Paragraph 071 of the Tree Preservation Orders and trees in conservation areas section) advises that, where appropriate, authorities may encourage single applications covering regularly repeated operations or phased works. CCC considers the</p>	<p>Need to discuss this further please to ensure we have an agreed an consistent approach across Greater Cambridge.</p>	<p>Permission allowing repeat works are standard practice and reduce the number of applications that need to be processed, freeing up resources.</p>

	<p>following particularly suited: • Crown reductions to a defined retained size (e.g. canopy dimension of 12m width and 16m height). • Crown lifting to maintain a defined clearance (e.g. 3m above ground, or 1.5m clearance to adjacent buildings). Repeat consents will normally be issued for a maximum period of 10 years. Applications must clearly specify the operations, retained dimensions, timing/frequency, and an end date. This reduces administrative burden for owners, contractors and the LPA, while giving certainty for long-term management</p>	<p>Mixed views to some of these suggestions.</p>	<p>The suggestions are reasonable examples of when repeat permissions might be appropriate, subject to justification. They do not represent a commitment to allow such works.</p>
8	<p>Link to online form has been removed</p>		<p>Links will be checked and updated when pathways are fixed.</p>
8	<p>Considerations</p>	<p>Again there is confusion over the difference between TPO applications and S211 notifications and level of detail required</p>	<p>This section is not stating a requirement but a principle. If you don't successfully justify the work and work will be detrimental to amenity the application will be refused or a TPO served if warranted. The section makes a clear distinction between applications and notifications</p>
8	<p>Trees are living and therefore everchanging and dying organisms. In addition to natural circumstances that result in tree loss, problems can arise that require tree Page 9 of 11 removal or pruning. The arboricultural landscape is therefore ever changing, albeit slowly, and not protectable in the same way as a listed building for example. Notwithstanding this, and depending on their location, size, age and condition, the value of some trees to amenity is sufficient that the benefits they offer outweigh the desires of landowners. When considering the merits of a tree work application or section 211 notice, GCSP will balance the amenity value of a tree, the impact the proposed work will have on its amenity value and the justification submitted. Generally, t detrimental works to trees of value will be resisted, without</p>	<p>Suggest that this reads : 'Trees are living, dynamic organisms'</p> <p>Need to discuss this further.</p>	<p>Amendment has been made that incorporates the suggest but retains the key point.</p> <p>The section set out the principles relating to balancing amenity value against justification. There are no associated risks to reputation or resources.</p> <p>See comments above regarding TEMPO</p>

	<p>sufficient justification. Typically, the lower the amenity value, the lower the justification for works needs to be. The below categories provide useful definitions of amenity value levels. • Trees of limited amenity value (for example, young trees, those with structural defects, or those nearing the end of their safe useful life) will require less detailed evidence to justify intervention. • Trees of some amenity value (for example, healthy street or garden trees making a positive but not distinctive contribution to the local environment) will require a reasonable level of evidence, including monitoring and engineering reports, before removal or significant works will be considered. • Trees of special amenity value will require robust evidence that clearly demonstrates the causal link between the tree and the alleged damage, alongside an assessment of alternatives. • Trees of outstanding amenity value will require the most rigorous and comprehensive evidence before removal or significant works will be considered. Using this approach ensures consistent decision-making. GCSP will consider these criteria when assessing both the suitability of protection and /or the prohibition of works in order to balance detriment to the public against the needs or desires of a landowner</p>	<p>When GCSPS assess a S211 notice they will consider the desirability of the works and the tree’s suitability for inclusion in a TPO, according to TEMPO.</p> <p>When assessing TPO application GCSPS will follow the guidance within Planning Practice Guidance: TPOs &amp; trees in CA, in particular section 8.</p>	<p>PPG does not conflict with the advice set out in ‘Considerations’</p>
9	<p>Appeals against decision to refuse consent or impose conditions can be made to the Secretary of State and details <b>in</b> how to do this are provided in decision notices.</p>	<p>Typo</p>	<p>Edited</p>
10	<p>While a section 211 notice does not have to take any particular form, it is recommended that they are made in the same way as a TPO application. A section 211 notice must identify and locate the subject trees, describe, accurately, the work proposed and include the date it is submitted. A plan is not mandatory but is helpful. Evidence is not required to support structural damage,</p>	<p>Although correct it contradicts the information provided previously in the strategy.</p> <p>A reason for works and evidence in support of the notification is not mandatory but is helpful</p>	<p>Information provided previously has been amended to remove risk of misunderstanding.</p>

	health or safety but without the submission of evidence, the removal of valuable trees will be resisted		
10	Many of the benefits associated with tree canopy are provided local to the trees themselves, mitigating tree losses or making provision for new tree planting therefore is not appropriate off site	BNG allows for this though	<p>While elements of BNG are connected to replacement trees, this provision is separate and is supported by the draft GCLP</p> <p><i>'Urban Tree Canopy Cover across the Greater Cambridge area increased to a target of 20% by 2050 from current baseline. <b>Development achieves a minimum future tree canopy cover of 30% of the site area through retention of existing trees and planting of new trees.</b>'</i> And <i>"Proposals for increasing and maintaining Urban Tree Canopy Cover reflect good practice tree planting and management GI guidance."</i></p>
10	As part of the process the Built and Natural Environment team is consulted on applications with arboricultural interests.	Working on this!	<p>Planning application consultation is essential to the protection and replacement of trees on development sites. Both of which are essential to canopy cover aims. Any lack of consultation could lead to the loss of trees of value and/or a lack of replacement planting; risking UFS goals and CCC and GCSP service reputation.</p>

## FORMATTING POINTS/GENERAL COMMENTS (RESPONSES IN BLUE ITALICS)

- Policy 'Protect More' is written as 'P.6' whereas should be 'Policy P6'- to be consistent. - *Amended*
- Pg.17, 4<sup>th</sup> sentence "The s evidence" remove 's'. *Amended to - 'This evidence'*
- Pg. 9- Topic paper 9, 3<sup>rd</sup> sentence "Generally, t detrimental' remove 't' - *Amended*
- Bullet lists (some have additional bullet with not text)- *Surplus bullet to be removed*
- Strategy is replacing the CCC 2016 Tree Strategy (which runs out in 2026)> Perhaps helpful to state what previous documents this strategy is replacing/building on perhaps in section 'why do we need a strategy']. – *Text added referencing 2016 Tree Strategy*. New strategy has higher level policy whereas 2016 sets out policies which have greater detail about process/decision making and implementation: i.e. " POLICY GM3: All planned tree works will be published on the Council website and through site notices for the community to access at least 20 working days before implementation. The Council sees this as an important tool for communicating to the local community about tree work planned for their area and the reasons why the works are necessary" has this been done on purpose? If strategy does not set out details where will they be set out? *The details are set out in the Topic Papers. This creates a more concise and therefore accessible core document. This is a conscious modernisation choice. Consultation detailed in GM3 is presented in Topic Paper 1. Details form the Tree Strategy 2016 have not been lost but relocated to the UFS.*
- Strategy Page 5: difficult to understand immediately how each section of the strategy is divided and combines to deliver the vision and aims. The structure of the content is ordered differently to how it is set out in 'How to use the Strategy'. *The structures is ordered the same way in both content and How to use the strategy. The content page however includes additional sections linking the core items*. Suggest considering looking at presentational order of the strategy to aid reader understanding/the narrative. *Amendments have been made to 'How to use the strategy' introduction to aid comprehension of the narrative*. The description of TP content is sitting after the glossary, suggest it would be helpful to narrative and understanding to move this to section 'How to use the strategy'. *Topic Papers will be linked throughout the core document once the necessary pathways are fixed. This will aid the narrative.*
- Strategy- Pg20 onwards- The layout on page 20 is not clear that starts with a summary of each of the sections which follow- could the headings/layout be looked at to make it more reader friendly? – *Amendments have been made to improve comprehension.*
- Is there a reason that context/supporting text is not for all policies within policies section? Although Topic Papers provide supporting text/technical guidance it is not obvious when reading strategy document which Topic paper supports which aims, policies and actions. Would be helpful if supporting text was included for all policies as unclear why policy needed/to be implemented without this. *Some policies are more focused than others and therefore don't need to be put into context, however supporting text will be added for consistency. Please note all policies are supported either directly by text or via the TPs.*
- Would have preferred to have seen a joint strategy with South Cambridgeshire to cover all of Greater Cambridge and we hope that this can be explored at a future date. *The option of producing a single joint UFS for Greater Cambridge was considered and risk-assessed, but was*

*ultimately not taken forward at the Cabinet approval stage. There were several practical reasons for this decision. SC does not currently have an up-to-date tree strategy, and there are significant differences in context and approach between urban forest management in Cambridge City and the predominantly rural tree management challenges in SC. In addition, the CCC's 2016 Tree Strategy was nearing expiry, while CCC's Climate Change Strategy and Biodiversity Strategy were being renewed/ reviewed, creating a clear and time-limited opportunity to align consultation and policy objectives. CCC also has a well-developed evidence base to support an urban forest approach, which SC does not currently hold to the same extent. Progressing a joint strategy at this stage would therefore have required either delaying the City's strategy or diluting its evidence-led focus, risking loss of momentum. That said, the Council recognises the value of a more joined-up approach across Greater Cambridge. Provided the challenges around data availability, land-use differences and policy alignment can be addressed, there is no reason why closer alignment or a future joint approach could not be explored at a later date.*

- The UFS confirms that GCSPS Tree Team will administer all statutory tree controls for the LPA, as agreed through the City Transition in 2025, but goes further and sets out aspirational work for which significant new resource would be required to deliver, but the source of which is not identified in the document. This requires further discussion before formal consultation takes place. GCSPS will be happy/ able to do this work if Cambridge City Council wishes to fund the additional posts. *Aspirational work is set out in the strategy to highlight where improvements to the deliverability of the vision can be made and to aid leverage of additional resources. They do not convey a commitment without such additional resources. They also do not alter any statutory duties or responsibilities.*
- We have compared the proposed UFS with the draft Local Plan policies, which is currently out for consultation ( 1<sup>st</sup> December 2025- 30<sup>th</sup> January 2026) and have set out some suggestions to ensure these align (see table below). It would be helpful to discuss these further with you, bringing tree and policy officers together. *The UFS has been reviewed to align with the draft GCLP, amendments have been made to the UFS where potential conflicts have been highlighted. Responses have been provided in the table above where there appears to have been a misunderstanding of the text. Our approach has been to ensure that the UFS complements, rather than duplicates or conflicts with, the existing and draft LPs.*
- Topic Paper 9 (“Statutory Responsibilities and Planning Control”) expands and codifies how the Council will manage Tree Preservation Orders (TPOs), Conservation Area notifications, tree work applications, and planning enforcement. This confirms that GCSPS will administer all statutory tree controls for the LPA and appears to require arboricultural input for every planning application affecting trees, with explicit reference to BS 5837: 2012 compliance, Arboricultural Impact Assessments, and Method Statements. It suggests that off-site planting will rarely be acceptable mitigation, requiring planners to secure on-site canopy provision and space for tree maturity. *TP9 clarifies how existing statutory responsibilities and good practice are applied in Cambridge; it does not introduce new requirements, thresholds or automatic triggers for arboricultural input. Consultation with BNE Tree Team is already required for planning applications effecting trees to allow officers with the appropriate experience to assess impacts and arboricultural input will be limited where impacts are considered acceptable. As many of the benefits associated with trees are local to those trees, off site canopy provision does not benefit the community local to the development.*

- The UFS also introduces the expectation of strategic, proactive TPO making, not only reactive designations, which is a change from the existing operating procedures which would require much more time (and therefore staff) to deliver. *This expectation is not newly introduced. CCC was working on strategic protection before the restructure. Notwithstanding this, any proactive tree protection or TPO review will only be pursued when resources allow and is aimed to be a collaborative project with CCC.*
- The strategy also reiterates that development must provide space for existing and future large-canopy trees. Development management teams would need to embed tree constraints mapping at pre-app stage, which might lead to an increased need for design review and condition drafting expertise. This may also influence validation requirements (e.g., mandatory AIA/AMS submission thresholds) and need further consideration and discussion. *The provision for the planting of long-lived, large canopy trees is an essential element of canopy cover improvement (see Topic Paper 12). This principle is supported in the draft GCLP at BG/TC. Tree constraints mapping is an essential tool at pre-app stage. Without tree constraints information the potential impact of a proposed development cannot be assessed properly and arboricultural advice to the applicant will be limited. Potentially resulting in the loss of trees of value, lack of provision for tree planting required in accordance with canopy cover targets set out in the draft GCLP, and reputational risk.*
- The UFS references breaches and enforcement. The Council has an agreed Compliance (enforcement) policy: [Greater Cambridge Shared Planning compliance policy](#) which should be referenced. *It has now been referenced.*
- Does this UFS replace or supersede existing 2016 Tree Strategy as some things that are covered in the that are not covered in this Strategy? *UFS replaces the CCC Tree Strategy. Elements not covered in the core strategy are covered in the Topic Papers.*

### **The Nature of the additional proposed workload for GCSPS**

The strategy effectively increases the Planning Tree Team’s scope from a casework-response unit to a strategic and enforcement-enabled service underpinning multiple policy agendas. To deliver this sustainably, the team will need additional full-time equivalent staff, (likely 1 – 2 FTE) spread across development management, enforcement, and data monitoring, plus investment in training, system integration and engagement /outreach activities. The strategy would change the Planning Tree Team beyond its traditional “reactive” role (TPOs, applications, appeals) into a much broader proactive and data-led remit, including:

- Greater volume and complexity of casework, particularly at pre-application stage.
- Increased enforcement activity (breaches, CAVAT valuations, restitution planting).
- Contribution to strategic policy and monitoring frameworks (canopy cover, BNG, LNRS alignment).
- Requirement for public transparency, consultation, and cross-department liaison.
- This combination means both more cases and more technically demanding cases, with heavier evidence and data requirements.

*The UFS does not introduce responsibilities additional to those undertaken prior to the restructure, existing service expectations are unchanged. Aspirational tasks would only be undertaken where resources allow and in collaboration with CCC Tree Team, again when resources allow. Including*

*these aspirational elements in the strategy provides the leverage needed to seek additional resources. There is no implicit expansion of GCSP's remit as a result of adoption of this UFS*

*Final note: Where the UFS identifies aspirational elements for enhanced delivery, these are intended to illustrate the direction of travel and areas where outcomes could be strengthened if resources allow. They do not create new statutory duties or service commitments, nor do they alter existing roles or processes. Delivery of aspirational elements will be subject to available funding, capacity and will be progressed collaboratively where appropriate.*

END