

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, commenced on 27 October 2025 and ran until 9 December 2025.

Responses indicated that the Urban Forest Strategy, its vision, principles, aims, policies, actions and Topic Papers were generally supported. Comments revealed that minor amendments would aid clarity, document navigation and comprehension but that there were no risks to deliverability, resourcing, finance and governance.

Authority to proceed to public consultation was delegated to the City Services Director by Cabinet in September 2025. Authorisation was requested and gained to amend the UFS and referenced topic papers, as detailed in the review and proceed to public consultation alongside the Biodiversity Strategy Mid Period Review.

PUBLIC CONSULTATION

Following authority to amend the Urban Forest Strategy (UFS) with consideration of the internal consultation, the public consultation was carried out in accordance with current council protocol and alongside the Biodiversity Strategy Mid Period Review. The Purpose of the UFS public consultation was to test support for its vision, aims and delivery approaches; gather views on canopy equity, protection and planting; raise awareness of the urban forest concept; and encourage shared stewardship.

On 6 January 2026 online public consultation commenced via Go Vocal, the Council's consultation portal. Email submission were permitted as part of this process. The Go Vocal consultation closed 10 February 2026. The deadline for email submissions was extended on request to 12:00 noon 17 February 2026.

A webinar was recorded providing an overview of the Urban Forest Strategy. This was made available to the public via Go Vocal.

RESPONSES

Responses to the consultation are summarised below.

Written responses were received via:

- Go Vocal
 - 256 responses to the combined Urban Forest Strategy (UFS) and Biodiversity Strategy mid-review (BSR) consultation.
 - 83.2% responded to both UFS and BSR
 - 8.6% to responded to mainly UFS
 - 8.2% to responded to mainly BSR
- Email: 8 responses, including an additional internal response.

REVIEW

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

Overall, the Go Vocal responses indicate that the Urban Forest Strategy has been well received, with the majority of feedback in support of the urban forest concept and the strategy vision, aims and delivery approaches. Comments on canopy equity indicate general support for focussing increasing canopy cover in less well represented areas. 66% of respondents would like increased investment in new tree establishment and there was also strong support for community involvement in this area. The majority of comments support a more ambitious target for canopy cover increase than is proposed and support prioritising the planting of climate resilient species, actively diversifying species mixes and integrating canopy cover with habitat connectivity. Feedback supports the retention and protection of mature trees, without significant justification for removal.

With reference to community activity, while some respondents requested easier access to resources, clearer communication, and practical help many respondents focused on improving community-led planting, care, and monitoring; education and engagement through schools and families; accessible volunteering; and support for biodiversity in private gardens, supporting the urban forestry approach.

Some helpful suggestions and recommendations have also been made through Go Vocal but predominantly through emailed feedback. These suggestions are aimed at strengthening policy, embedding UFS policy in the emerging Local Plan and addressing perceived gaps. In addition we have received a few comments that indicate a misunderstanding of the text or how the strategy works. There is a common request to increase the number of policies or add operational and/or technical commitments to existing policies. However, the UFS has been designed to be achievable, workable, and to minimise the core document length, which improves accessibility and provides the operational and technical information, research, guidance and background in a series of Topic Papers.

Suggested alterations/additions that improve the strategy have been acted on or 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.

All links and references will be confirmed prior to final publication.

The Tree Team at this stage would like to thank all individuals 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 public consultations was to test support for its vision, aims and delivery approaches; gather views on canopy equity, protection and planting; raise awareness of the urban forest concept; and encourage shared stewardship. Overwhelmingly, responses to the public consultation indicate support of the UFS.

Biodiversity and urban forest strategies

End of survey report

Which of our strategies would you like to feed back on?

256/256 - Multiple choice - choose one - required

Both 83.2% (213 choices)



Urban Forest Strategy 8.6% (22 choices)



Biodiversity Strategy 8.2% (21 choices)



Does the strategy clearly explain the concept of Urban Forestry?

136/153 - Multiple choice - choose one - optional

Clearly explains 50.3% (77 choices)



Somewhat explains 34.6% (53 choices)



No answer 11.1% (17 choices)



Does not explain 3.9% (6 choices)



Do you support the overall vision, principles and aims of the Urban Forest Strategy and the direction of travel for the next decade?

142/153 - Multiple choice - choose one - optional

Strongly support 60.8% (93 choices)



Support 22.2% (34 choices)



Neutral 8.5% (13 choices)



No answer 7.2% (11 choices)



Strongly oppose 1.3% (2 choices)



Oppose 0% (0 choices)



What level of ambition should Cambridge adopt for future canopy cover and overall tree legacy?

148/153 - Multiple choice - choose one - optional

Adopt an ambitious long-term target above current levels (~25%), supported by major investment 60.1% (92 choices)



Aim for modest canopy growth, prioritising areas with the lowest canopy cover 22.9% (35 choices)



Aim for modest canopy growth (~20%) over the next 10-15 years 11.1% (17 choices)



No answer 3.3% (5 choices)



Maintain the current canopy cover (no major change at ~17%) 2.6% (4 choices)



What approach should the council take to selecting tree species in a changing climate?

143/153 - Multiple choice - choose one - optional

Prioritise climate-resilient species (including non-native) where evidence supports it 28.8% (44 choices)



Actively diversify the species mix for long-term resilience, even if this means major shifts from historic species 24.2% (37 choices)



Use a mix of native and non-native species, with careful site-based selection 20.9% (32 choices)



Prioritise traditional native species wherever possible 19.6% (30 choices)



No answer 6.5% (10 choices)



How should the council balance mature tree retention with public safety?

149/153 - Multiple choice - choose one - optional

Retain mature trees wherever reasonable, accepting some residual risk, to preserve public benefits 43.1% (66 choices)



Retain mature trees where risks are tolerable and can be managed proportionately 33.3% (51 choices)



Balance safety with retention, using pruning before removal 15.7% (24 choices)



Prioritise safety above all; remove trees where risk is identified 5.2% (8 choices)



No answer 2.6% (4 choices)



What level of responsibility should developers have for new and existing trees?

148/153 - Multiple choice - choose one - optional

Provide full funding for establishment/aftercare (for example, at least three years), long-term protection and enhanced canopy delivery 60.8% (93 choices)



Deliver high-quality tree retention, planting and aftercare as a standard requirement 29.4% (45 choices)



Meet minimum national requirements 3.3% (5 choices)



Protect existing trees of value and plant replacements where feasible 3.3% (5 choices)



No answer 3.3% (5 choices)



How should the council prioritise where new trees are planted?

147/153 - Multiple choice - choose one - optional

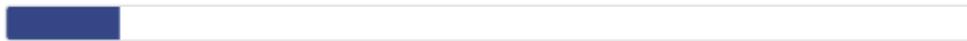
Where canopy cover is lowest or heat risk is highest 54.2% (83 choices)



Strongly prioritise areas with the greatest environmental inequalities, even if this means fewer new trees elsewhere 22.9% (35 choices)



Evenly across the city 11.8% (18 choices)



Where new development is happening 7.2% (11 choices)



No answer 3.9% (6 choices)



What approach should the council take to replacing and establishing new trees?

145/153 - Multiple choice - choose one - optional

Increase replacement ratios and invest in high-quality watering and formative care 66% (101 choices)



Treat young-tree establishment as a high-priority investment, even if it means planting fewer trees 17.6% (27 choices)



Replace trees 1:1 and provide basic establishment 8.5% (13 choices)



No answer 5.2% (8 choices)

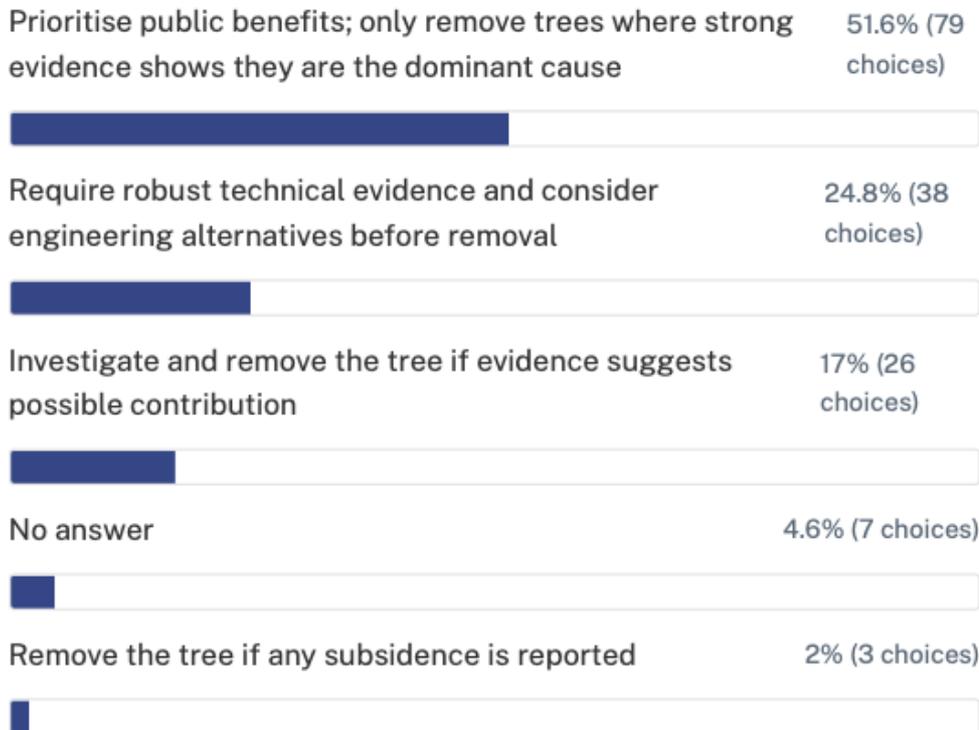


Replace removed trees 1:1 where possible 2.6% (4 choices)



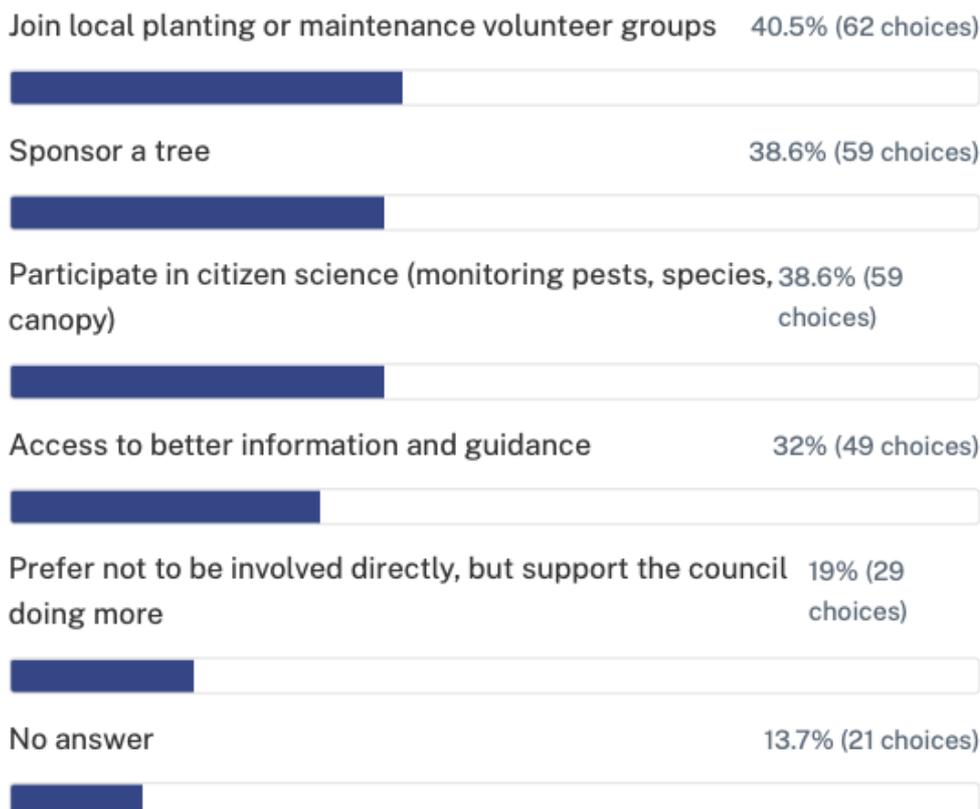
What approach should be taken when subsidence is alleged to be caused by a public tree?

146/153 - Multiple choice - choose one - optional



How would residents like to be involved in supporting Cambridge's urban forest?

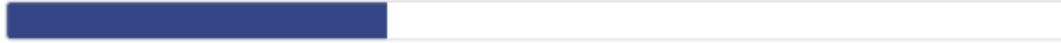
132/153 - Multiple choice - choose many - optional



If resources are limited, what should the Council prioritise?

146/153 - Multiple choice - choose one - optional

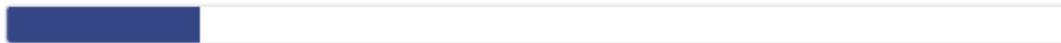
Maximising long-term benefits (biodiversity, shade, climate) even if it means difficult trade-offs (like what) 35.9% (55 choices)



Maintenance and aftercare of existing trees 24.2% (37 choices)



Planting fewer trees but with proper establishment 18.3% (28 choices)



Engagement, education and partnerships to expand capacity 11.8% (18 choices)



Tree safety work 5.2% (8 choices)



No answer 4.6% (7 choices)



What would you like to do next?

148/153 - Multiple choice - choose one - optional

Go to cross-cutting questions 80.4% (123 choices)



Go to end 16.3% (25 choices)

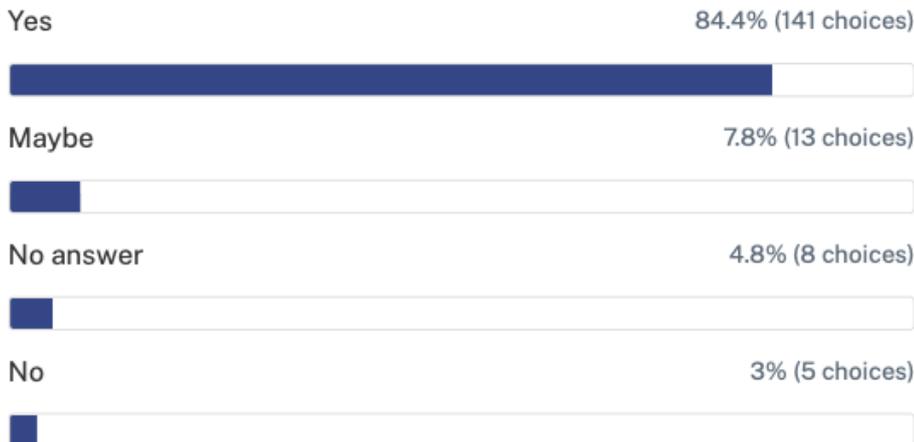


No answer 3.3% (5 choices)



Do residents support a more integrated approach to canopy cover, habitat connectivity and species recovery?

159/167 - Multiple choice - choose one - optional



How should the city adapt habitats and planting practices to hotter, drier summers and increased climate risks?

93/167 - Long answer - optional

Respondents most frequently emphasised the need to plant more trees, especially those that are resilient to hotter, drier conditions and future climate scenarios. Many called for prioritising the protection and maintenance of existing mature trees, which are seen as more resilient and valuable for shade and biodiversity.

A strong trend was the recommendation to diversify planting, using a mix of native and climate-resilient species, to hedge against uncertainty in future weather patterns and pests. Some stressed the importance of focusing on native species for biodiversity, while others argued for including non-natives if they are better adapted to future conditions.

Water management was another key theme: respondents suggested rainwater collection, rain gardens, ponds, and mulching to support plant survival and reduce reliance on mains water. Several also highlighted the need for improved soil health as a foundation for resilient planting.

Community involvement in watering and caring for new plantings was widely supported, with suggestions for volunteer schemes, public awareness campaigns, and involving schools.

Many respondents advocated for increasing shade through tree avenues, green walls, and roofs, and reducing hard surfaces to mitigate urban heat. There was also support for creating and maintaining wetlands, wildflower meadows, and less intensively managed green spaces.

A number of responses stressed the importance of evidence-based, expert-led approaches, learning from other cities, and adapting strategies as more is learned.

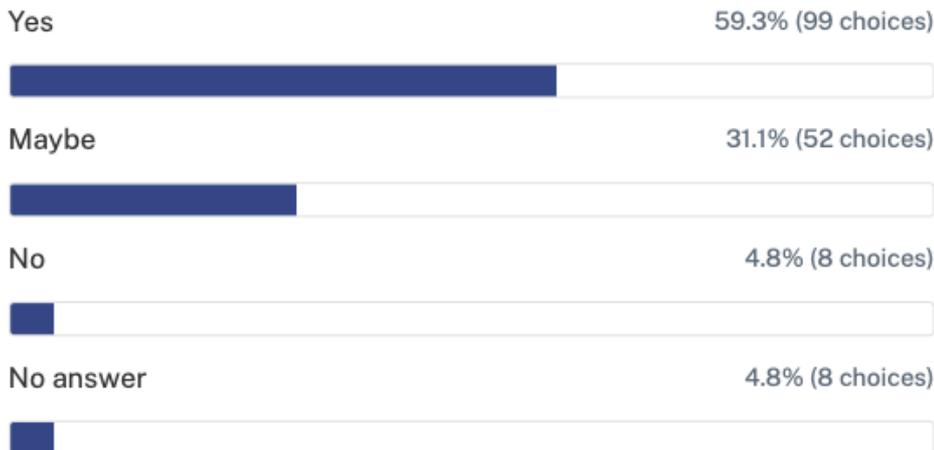
Some respondents raised concerns about the unpredictability of future climate (including wetter winters), and the need to avoid over-reliance on any one approach. A few questioned the premise of climate adaptation or the urgency of intervention.

Overall, the main trends were: prioritising tree planting and protection (especially shade and resilient species), diversifying plantings, improving water and soil management, involving the

 English and taking an evidence-based, flexible approach.

Should reasonable resources be directed first to communities with the lowest canopy cover and poorest access to wildlife?

159/167 - Multiple choice - choose one - optional



What role could communities play in both tree and biodiversity?

82/167 - Long answer - optional

Most respondents emphasised the importance of community involvement in both tree planting and ongoing care, particularly watering and maintenance of young trees. Many suggested schemes such as 'adopt a tree' or 'guardian' roles for residents, schools, or local groups.

Education and awareness were frequently mentioned, especially through schools and community events. Several respondents highlighted the benefits of involving children and families, both for biodiversity and for fostering stewardship.

Volunteering opportunities, monitoring, and reporting issues were also common themes. Respondents noted the need for accessible and well-publicised volunteering, with some suggesting family-friendly sessions and community events.

Many stressed the value of local knowledge and input, including species selection, site suggestions, and everyday stewardship. Some respondents called for more support, training, and genuine decision-making roles for communities.

Private gardens were identified as a major issue, with suggestions to encourage retention and replacement planting, and to promote biodiversity-friendly gardening. Hedgerows, leaf litter, and wildlife corridors were also mentioned as ways to boost biodiversity.

Some respondents noted barriers such as lack of time, unclear information, or insufficient council support, and called for easier access to resources, clearer communication, and practical help (e.g. watering equipment, rainwater collection hubs).

Overall, the strongest trends were calls for community-led planting, care, and monitoring; education and engagement through schools and families; accessible volunteering; and support for biodiversity in private gardens.

How can we best present evidence, decisions and trade-offs to build public confidence across both strategies?

65/167 - Long answer - optional

Transparency, honesty, and clear communication were the most frequently emphasised themes. Respondents repeatedly called for open explanations of decisions, evidence, and trade-offs, using plain language and avoiding spin. Regular updates and feedback loops, such as email newsletters, were suggested to keep the public informed about progress and outcomes.

Many respondents stressed the importance of using a wide range of communication channels, including social media, local press, leaflets, noticeboards, public events, and community meetings, to reach diverse audiences. Visuals such as maps, diagrams, artist impressions, and short videos were recommended to make information more accessible and engaging.

Demonstrating real-world results and successful case studies, both locally and from other cities, was seen as important for building trust and showing the impact of strategies. Several responses highlighted the need for baseline data, measurable targets, and transparent reporting on progress, costs, and benefits.

Active public engagement and collaboration were also recurring themes. Respondents wanted opportunities for feedback, influence, and involvement, with some suggesting support for local champions, schools, and community groups. Listening to public opinion and showing how it shapes outcomes was seen as key to building confidence.

A minority of responses expressed scepticism or opposition to the strategies or questioned the council's priorities

EMAIL RESPONSES

Email Feedback from the UFS Public Consultation. Feedback is provided in full with *Officer Comments, actions underlined and in italics* where suitable.

Email 1.

I've been reading Cambridge's Draft Urban Forest Strategy and was struck by how clearly it sets out a practical, data-led programme to **manage more, protect more, plant more and engage more**, underpinned by evidence, tracking and cross-service coordination.

Officer Comment: Positive feedback with no action required.

Email 2.

When you plant trees please make sure they are trees and not tiny twigs and protect them well. AND in Summer WATER THEM!!! If not it's just a waste of (our) money!!!

Officer Comment: Not strictly related to the strategy. Passed to Urban Forest Manager for consideration.

Email 3.

Climate change, and taking some action to minimise its impact is important.

Officer Comment: Positive feedback that does not require a response.

Not everywhere needs trees, so the positioning of them and what needs careful consideration, perhaps more so than in the past. For instance, Jesus Green has plenty of trees already, especially with the recent planting, but perhaps Coldham's Common does not have the same variety. Not everyone wants to sit in the shade, but they need access to it. Enormous trees which shed leaves create other problems, particularly for walkers and cyclists when surfaces become too slippery and dangerous. Careful thought needs to be made about the types and locations of trees, and what impact they might have without thinking this through.

Officer Comment: Not strictly related to the strategy. Passed to Urban Forest Manager for consideration.

Increasing biodiversity with planting is excellent, especially for insects and bees. Again, thought about where the planting takes place to have benefit without harm to humans, and I believe that most people enjoy seeing flowers and wild planting across the city.

Officer Comment: Positive feedback that does not require a response.

I personally do not enjoy walking in long grass, particularly when it is damp, and non-mowing or reduced mowing is frankly a nuisance.

Finally, though not mentioned, the lack of weeding the street pavements and paths is a disgrace, under the guise of helping the environment. It makes everywhere look untidy and unloved. If you go to Switzerland, you see properly kempt roadways and paths, and they still protect the environment.

Officer Comment: Above two comments not strictly related to the strategy.

It would be helpful for the whole Council to have joined up thinking on its different strategies so that one does not wipe out the other.

Officer Comment: Internal and external consultation on three interconnecting strategies has been carried out. While the strategies are separate they are mutually reinforcing.

Email 4.

Too long and repetitious and I agree with the principles and direction.

Officer Comment: The length has been reduced, primarily through referencing, not repeating, information contained in Topic Papers.

Email 5.

Thank you xxxxxxxx for allowing residents an extended 17 Feb deadline for commenting on the council's Biodiversity and urban forestry consultations.

We should like to thank you and your team for all the hard work that has gone into preparing the urban forestry strategy and also the biodiversity strategy

The xxxxxxxxxxxxxxxxxxxxx supports and endorse the two submissions on the strategies submitted by xxxxxxxxxxxx. Many residents share xxxxxxxxx concerns about the lack of urgency about the nature crisis. They feel that these strategies need ramping up. It is not at all clear who is responsible for delivery. Who is responsible for what, by when and how will they be held to account. Who do residents go to for example about lack of enforcement ? Or the damage done in their areas by utilities and contractors ? These are big issues for many Cambridge residents who feel that there is no tangible sense of local neighbourhood benefits or ownership in these strategies. Yet, they highlight that if the council is serious about addressing climate change, a strong sense of local ownership and local neighbourhood across Greater Cambridge will be essential to achieve this.

Officer Comment: City Services Tree Team is responsible for delivering the overall UFS but its purpose is to empower everyone to take part. More specific responsibilities are included in Topic Paper 1, which sets out management and ownership of Cambridge City Council and Cambridgeshire County Council trees. Topic Paper 6 sets out governance and how services work together. Topic Paper 9 sets out the responsibilities associated with legislation and trees in private ownership. Enforcement is set out in Topic 11 and deals with City's responsibilities regarding damage to council trees and how the GCSP service deals with planning enforcement (unauthorised works to private trees). Topic Papers form part of the strategy and guide day to day operations responsibilities, duties and policy.

With 75% of trees in private ownership, the council cannot deliver canopy cover aspirations through asset management alone. Trees on private land are vital to a healthy urban forest but legislation limits a council's authority to enforce action on private land. It is essential therefore that the community accepts some responsibility for greening the city but the strategy reinforces the Council's commitment to provide the necessary help, guidance and incentive.

Many residents have shared concerns with us that the focus in the strategies is on targets rather than on engaging residents – they ask where are the plans for hedgehog corridors- where are the incentives

for replacing hard landscaping and/fences. Encouragement for not using pesticides? Plastic lawns. They ask “ is there enough water for gardens and wildlife? “

Officer Comment: The point is not directly related to the UFS

Residents say what about including a protection for "groups of trees" and for street trees as habitat corridors and engaging residents and schools and the universities in doing this?

Officer Comment: Subject to resources, the UFS commits to improving protection for trees in its Protect More policies.

As a specific example there is no listing for Homerton College’s beautiful avenue of mature trees with its cow parsley. Yet this attractive group of mature trees is a major feature on Hills Road, one of the main city approach roads.

Officer Comment: Homerton College trees are protected by TPO 24/2018.

How are residents to assess outcomes? What will success look like in their area? Is there enough water for wildlife and gardens? How many hedges not new fences? How many concrete front gardens?

Officer Comment: UFS outcomes will be recorded and information made available to the public. This is set out in Appendix 2.

How are you planning to engage residents

We are hearing concerns that the community's voice has been diluted in these strategies.

Officer Comment: Consultation commitments remain the same, details are now located in Topic Paper 1. Consultation on Tree Work Application consultations follow the structure set out by GCSP.

Additional comments relating to grazing have not been included in the UFS review.

Email 6.

I found the draft strategy a very good starting point. I like the idea of using the ‘urban forest’ concept instead of the previous approach focussed on trees alone but I think this needs a clearer and simpler explanation at the beginning. The term ‘urban forest’ has been around for several years, but is being used in a variety of ways and can come across as jargon if not used carefully. When it comes to the policies and actions sections of the strategy, much of the focus is in fact on trees. Hopefully the revised version will explain a little more succinctly the reason for moving from a trees-only approach to the urban forest approach, and also ensure that the concept is followed through to policies and actions.

Officer Comment: An improved explanation of urban forestry has been included in revisions and placed earlier in the strategy. The focus of the UFS remains on trees but the policy has been aligned with the Biodiversity and Climate Change Strategies to ensure a more co-ordinated approach.

Could POLICY M1 be worded as follows: “The Council will prioritise its legal and health, safety and **environmental** obligations over all other aspects of the service.” The addition of the word ‘environmental’ seems important given the good earlier explanation and context that is provided for the need to ensure that trees are managed within the context of the broader natural environment and the obligations that now exist to protect and maintain this.

Officer Comment: The purpose of M1 is to confirm that health and safety and legal obligations must be prioritised. This approach does not, however, result in a zero tolerance culture. Amenities, ecology and environment remain key considerations of any tree removal/tree work decision.

Following a recent issue involving public complaints about tree and scrub management work along Coldham's brook (note that I consider the planned work to be well justified), which clearly was not understood by some members of the public and local journalists, I think POLICY E4 needs to be worded more strongly: "CCC will provide clear, accessible information about its tree management and planting through its website, public notices and consultation processes. Information will be provided in a clear and accessible way, proportionate to the nature of the activity and audience. This includes publishing guidance, consultation information and data where appropriate to support transparency and informed engagement." The Council website, public notices and the current consultation processes (all of which were, I believe, used in the Coldhams issue) seemed to be insufficient to prevent argument. Information needs to be provided in a "timely" manner, so perhaps this word could be added before the word 'clear', although this also needs to be understood as being 'well in advance' of the actual initiation of any work. Perhaps further thought could also be given to other mechanisms for getting information out to the public? Given the existence of the large volunteer conservation network in the city, could more use of this be made?

Officer Comment: Public consultation on works carried out or authorised directly by the Tree Team will follow the consultation process set out Topic Paper 1. The reach of the policy has its limits however and cannot be used to enforce other services to follow similar consultations.

This might also need to be reflected in Action 6, point 2 "Deliver public engagement activities including guided walks, talks and education programmes.", with more thought given as to how information can be got across to Cambridge residents, developers, and others on different sides of the debate (pro-conservation vs development). Some do not necessarily fully understand the complex ecosystem of an 'urban forest' and how this needs to be managed so that trees and associated vegetation can be maintained. It is understandably not easy, but is becoming increasingly important as tensions grow between those who want to maintain nature and those for whom economic drivers may be more important.

Officer Comment: Agreed. The service has a successful record of engagement, set out in Topic Paper 8, but will seek new avenues to resource projects, including community participation.

I regret not having had time to look in more detail at the strategy as I think it is so important for the City. I am not sure if there is any more that could be done to prevent the loss of trees from private land and gardens – the area around my house has changed markedly in this regard over the last 15 years or so, with the loss of many trees from gardens.

Officer Comment: This anecdotal evidence further supports the need for proactivity.

Email 7.

Officer comment: This feedback demonstrates substantial support for the Urban Forest Strategy (UFS / Strategy). It makes suggestions where areas are considered to be weak or missing detail.

Corporate guidance requires strategies to be concise. Internal consultation required the strategy to be significantly reduced in length. Consequently, repetition has been avoided and the strategy has been structured to simplify access to more detailed information on individual subjects. Some of the

suggestions made in the below feedback would result in unnecessary repetition that would increase the core document length, others, made to improve clarity have been incorporated succinctly, where appropriate. Comments are made in italics and underlined where alterations are proposed or not proposed as a result of the feedback, with reasons provided.

2. Overview

The draft Urban Forest Strategy contains much to commend. Among its best features are its clear long-term vision, explicit canopy-cover ambition, and its emphasis on equity, climate resilience, and partnership working. Its most valuable attributes are listed below.

- Linking high-level goals to delivery.
- Considering the urban forest as critical green infrastructure for a “healthier, fairer and more resilient city” over 2026–2036, rather than a collection of amenity trees.
- Adopting an explicit citywide canopy-cover target of “at least 20% by 2050”, linking this to climate resilience, intergenerational equity and environmental justice.
- Building on existing data and tools, noting where the tree canopy is low and where planting offers the greatest climate- and flood-risk benefits.
- Recognition that the tree canopy in Cambridge is very unevenly distributed, so targeting planting and protection to hotter, more vulnerable, and relatively tree-poor neighbourhoods.
- Stressing that trees are vital to addressing heatwaves, flooding, poor air quality and to boosting carbon capture – so also addressing wider climate-change and health agendas.
- Organising delivery around four intuitive approaches: “manage more, protect more, plant more, engage more”, which should be easy to communicate with residents.
- Tying these thematic approaches to policies and actions, aiming to strengthen a practical framework for maintenance and protection of the existing canopy, together with the delivery of new planting – all with appropriate public involvement.
- Alignment with the draft Greater Cambridge Local Plan (e.g., Policy BG/TC) and other key Strategies, so trees can be front and centre in planning and investment decisions.
- Commitment to introducing measurable Key Performance Indicators, so progress can be monitored more transparently.

Officer comment: The above is positive feedback that requires no Officer response or action to change the Strategy.

There are also important weaknesses and vulnerabilities. Addressing these would make this Urban Forest Strategy clearer, more concrete, and more robust. Suggestions for improvements to strengthen the draft are provided in the main body of my feedback. Two Appendices also compare the 2016 versus the new draft Strategy, aiming to maximise the strength of the latter by retaining and optimising key elements from the former. As in my parallel feedback on the draft Biodiversity Strategy – for clarity – specific proposed or new wording are preceded by a → symbol and highlighted in green text.

Officer comment: Noted. This introductory commentary sets the context for the detailed feedback below and does not require a specific change to the Strategy.

3. Keep it local to Cambridge

changes The quote on draft page (i) is charming, but unfortunately from a US source.

Replace the draft Strategy’s opening quote by:

→ *Single trees are extraordinary; trees in number more extraordinary still. To walk in a wood is to find fault with Socrates’s declaration that ‘Trees and open country cannot teach me anything, whereas men in town do.’ Time is kept and curated in different ways by trees, and so it is experienced in different ways when one is among them... It is valuable and disturbing to know that grand oak trees can take three hundred years to grow, three hundred years to live and three hundred years to die.*

Such knowledge, seriously considered, changes the grain of the mind... When woods and trees are destroyed... imagination and memory go with them. W.H. Auden knew this. 'A culture,' he wrote warningly in 1953, 'is no better than its woods.' - Extracted from *Underland: A Deep Time Journey* (2019) by Robert Macfarlane, Professor of Literature and the Environmental Humanities in the Faculty of English; Fellow of Emmanuel College, Cambridge.

Officer comment: Advances in arboriculture and urban forestry are not limited to Cambridge and many of the important developments have come from the U.S. The opening quote by Greg McPherson was selected for its narrative and community themes, which align closely with the Strategy's emphasis on shared stewardship and the urban forest as a collective story. The use of a non-UK source is not considered detrimental to the Strategy, and no change is proposed..

4. Clarify 'how the Strategy works' and roles

In the 2016 Strategy, Part 2 opens with a concise explanation of: how the Strategy works; its 3- part structure; and who does what. It then sets out in practical terms how trees are currently managed (outlining team structure, workloads, locations, and responsibilities). While this draft Urban Forest Strategy describes its elements (Vision, Principles, Aims, Approaches, Policies, Actions, Topic papers), it does not give the same simple operational overview of delivery structures, roles and responsibilities.

Officer comment: The change in structure from a two-part, all encompassing, document to a more concise core document with Topic Papers for the detail was a conscious decision that has been widely supported through internal consultation and Leadership Team feedback. The core Strategy therefore focuses on vision, direction and policy, with roles, responsibilities and delivery structures set out in the relevant Topic Papers. No change is proposed.

Why this matters

- It is harder for non-specialist readers (e.g. councillors, residents and partners) to understand how day-to-day decisions, inspections, enforcement and 'customer interactions' will work under this draft Strategy.

Officer comment: This point was considered. The Strategy has been deliberately structured to keep the core document concise, with operational detail on inspections, enforcement and customer interactions set out in the relevant Topic Papers . This approach was supported through internal consultation and Leadership Team feedback. No change is proposed..

- The move from "To protect / To enhance / To manage" to "Manage more / Protect more / Plant more / Engage more" is *conceptually* strong but less fully clear in operational terms that was provided by the 3-part structure in the 2016 Strategy.

How to fix this: 1

Add a new short section "How this Strategy Works in Practice" immediately after "How to use the Strategy" (around p. 6–7):

→ How this Strategy Works in Practice

The Urban Forest Strategy takes four complementary approaches to delivering the Council's vision and aims: 'Manage more', 'Protect more', 'Plant more' and 'Engage more'. These build on the previous Strategy's focus on protection, enhancement and management, but extend it to the entire urban forest – including trees in public, private and institutional ownership.

Day-to-day, the Council's Tree Team within City Services will continue to:

- Inspect and maintain trees in parks, open spaces, communal housing land and other Council sites.

- Deliver and commission both tree planting and establishment.
 - Provide arboricultural advice to planning, housing, property and other services.
 - Administer Tree Preservation Orders and notifications for trees in conservation areas.
 - Coordinate engagement, guidance and support for residents, community groups and partners.
- These operational functions are guided by the policies set out under 'Manage more', 'Protect more', 'Plant more' and 'Engage more', and supported by detailed Topic Papers and service-level procedures.

Officer comment: The Strategy follows a logical sequence from its principles through to its policies. The “More” delivery approaches set out how the Council will deliver the Strategy’s principles and aims and are therefore intentionally positioned in the document. Amendments have already been made to the “How to use this Strategy” section to clarify that the Topic Papers are the primary source of operational detail. No change proposed.

How to fix this: 2

Add the following text at the start of the 'Policies' section (p. 29), that clearly links back to the content in “How this Strategy Works in Practice” on operational delivery:

→ The following policies translate the Strategy’s principles and aims into clear rules and expectations for day-to-day decisions and actions. They will be embedded in service procedures, contracts and guidance used by the Tree Team and other Council services, and will inform how we work with partners, residents and developers across the city.

Officer comment: Since public consultation, the “How to use the Strategy” section has been updated to include a new “Using Topic Papers in practice” and “Status of the Topic Papers” subsections, which clarify how policies translate into day-to-day delivery and that Topic Papers are the primary source of operational detail and technical guidance. The introduction to the Policies section has also been amended to align with this clarification.

5. Strengthen the risk-management framework

The 2016 Strategy sets out a detailed tree risk-management framework: legal duty of care, explicit adoption of National Tree Safety Group principles, inspection levels (walk by, basic, detailed, advanced), inspection cycles, and clear policies WP1–WP7 on priorities, inspection, reactive works and emergencies. This draft Urban Forest Strategy refers to ‘Manage more’ and challenges/limitations but does not yet set out a similarly explicit risk-management policy framework.

Why this matters

- Without stronger and explicit risk-management, the draft Strategy risks losing clarity on how public safety, duty of care, and proportionate risk management will be maintained and evidenced.

How to fix this: 1

Under “Manage more” policies (pp. 29–30), **add** an explicit risk-management policy, drawing from WP2:

→ POLICY Mx: Proportionate Tree Risk Management

The Council will manage tree-related risks to people and property in line with nationally recognised good practice, including the National Tree Safety Group guidance *Common Sense Risk Management of Trees*. This will:

- Operate a system of proactive and reactive tree inspections, with frequencies proportionate to site use and risk.
- Maintain records of inspections and works carried out.
- Ensure individuals carrying out inspections are suitably trained and competent.

- Prioritise works that address significant risks to health and safety, while recognising the very low level of overall tree risk and the wider public benefits of trees.

How to fix this: 2

Insert explanatory text (pp. 29–30) to clarify inspection and maintenance cycles:

→ The Council will continue to manage trees on parks, open spaces and communal housing land through proactive inspection and maintenance cycles, supplemented by reactive inspections where concerns are raised or events occur. This cyclical approach provides a defensible framework for balancing public safety with the long-term health and value of the urban forest. Detailed service-level procedures and inspection frequencies will be set out in supporting Topic Papers and operational guidance, informed by National Tree Safety Group principles and sector best practice.

Officer comment: The Topic Papers and therefore the commitments they make form part of the strategy. The principle of removing detail from the core document and including it in the Topic Papers has been supported. The commitments cited above are retained within the Topic Papers, including explicit risk-management standards aligned with nationally recognised good practice. The core document introduces the strategy and sets out the justification, approach and policies while providing links to background information, research, operations and responsibilities allowing individuals to delve deeper into a subjected when needed, while keeping the core document at a more accessible size. No change proposed.

6. Clarify inspection and asset-management cycles

The 2016 Strategy explicitly describes a three-year inspection and maintenance cycle, the geographic rotation, and the move of parks trees into the same system; it quantifies tree numbers by category and explains recording systems such as Ezytreev. The draft Urban Forest Strategy **refers to** data, tools and monitoring **in general terms** but lacks the same concrete description of inspection cycles and asset-management systems.

Why this matters

- Stakeholders cannot easily see whether the existing three-year cyclical approach and asset-recording discipline will continue or how it might be altered.
- This weakens transparency for residents and for Councillors about service standards and expectations for inspections and routine maintenance.

How to fix this: 1

In the 'DELIVERY' section following the paragraph that follows the four listed 'approaches', and includes the text "targeting canopy change, applying data and tools" (on p 22), **add** a short paragraph on inspection cycles and data systems:

→ The Council will continue to use structured inspection and maintenance cycles for trees in parks, open spaces, communal housing land and other key sites, typically on a multi-year basis appropriate to risk and use. Inspection, condition and works data will be recorded in a corporate tree-management system, ensuring that decisions are evidence-based, auditable and consistent across the city.

How to fix this: 2

In the 'Monitoring, Evaluation and Key Performance Indicators' section (pp. 38-40), **add** a Key Performance Indicator for inspection coverage:

→ Percentage of Council managed trees covered by a recorded inspection within the target cyclical period for their site type (e.g., parks, communal housing, street trees managed by agreement).

Officer comment: The Topic Papers and therefore the commitments they make form part of strategy. The principle of removing detail from the core document and including it the Topic Papers has been welcomed. The commitments cited above remain in the core Strategy and Topic Papers. No change proposed.

7. Boost transparency re public-engagement in tree works

The 2016 Strategy has a clear, three-tier engagement framework (notification, public scrutiny, open consultation) with policies GM3–GM8 setting out which works fall into which category, timescales, and escalation to Executive Councillors.

While the draft Urban Forest Strategy highlights its 'Engage more' approach to emphasise both public engagement and environmental justice, the core document does not restate clear minimum standards on how residents are informed and engaged on specific tree works, nor does it elucidate the thresholds for scrutiny and decision making.

Other Councils have looked hard at these matters. After significant conflict between community, NGOs, contractors and the Council, Sheffield has now developed a 'partnership Street Tree Strategy' that follows best practice in decisions and communication about works affecting street trees. This uses web-based maps, public consultations on significant felling, and ongoing co-design of management approaches, coupled with annual review of measures and reporting to partners and the public.

Northampton publishes clear online guidance on how it meets the statutory 'duty to consult' when felling street trees, including on-tree notices, web notices, minimum consultation periods, and accessible digital and non-digital response routes. This sets out expectations for explaining reasons, replanting proposals, and providing both email and postal channels (so people without internet access can also participate) – aligning closely with proportional and accessible engagement principles.

Cambridge deserves *best practice standards* in this sensitive and important area.

Why this matters

- There could be a perceived *reduction* in transparency on felling, major pruning and replacement planting – compared to previous public experience of explicit triggers and timelines for scrutiny and consultation.
- Without explicit standards, there is a risk of inconsistency between services and projects in how engagement is carried out for significant tree works and management plans.
- Communication with ward Councillors, residents and stakeholders should be improved as (even under the existing Strategy), this has been uneven and inconsistent.

How to start to fix this: 1

Under “Engage more” policies (pp. 34–35), **insert** additional policies, building on GM3–GM7:

→POLICY Ex: Transparency on Tree Works

In order to inform local communities about upcoming routine, planned operations works in their area and why they are considered necessary, the Council will publish planned tree works on its website and, where appropriate (e.g., within a Conservation Area, or when a tree has a TPO, or is otherwise of significance to its locality), on Site Notices at least 20 working days before implementation. This will not apply where urgent safety works are required, but explanations for such reactive works will be provided by arboricultural Officers on request.

Officer comment: This information is provided in Topic Paper 1, which sets out consultation, notification and engagement standards for different categories of tree works, including statutory duties to consult on street trees and protected trees. The approach of locating detailed engagement thresholds and procedures in Topic Papers, rather than in the core Strategy, was supported through internal consultation. No change is proposed.

POLICY Ey: Public Scrutiny of Significant Tree Works

Allowing at least 20 working days for response before a decision is reached, the Council will invite comments from residents, ward Councillors and stakeholders on any significant tree works (affecting e.g., a tree over 75mm in diameter at 1.5m in height, or within a Conservation Area, or when a tree has a TPO) that may materially change the character of an area, and always when:

- Removing any healthy mature trees; and
- Conducting major crown reductions or other operations likely to noticeably alter local landscape character.

Where objections cannot be resolved at Officer level, decisions will be referred to the relevant Executive Councillor. In making a determination, the Councillor must consider both the amenity value and likely impact of the proposed works, and whether these are justified in light of the reasons for and against.

Officer comment: The above is a potential step backwards from the 2016 Tree Strategy and significant change from existing practice. With reference to Part 1 section 8 (Consultation), it was clearly shown that unsolicited consultation is resource hungry and not proportionate to responses received. Regarding consultation response times, these must necessarily be limited. The conservation area notification is a six-week process and the TPO application an eight-week process. Within those times applications/notifications must first be acknowledged, registered or returned (following assessment of submitted information). The consultation must include time to consider and respond or escalate. As committee meets once a month, even with the two-week consultation it is commonly not possible to take an application before committee within the eight-week time frame. No change is proposed.

POLICY Ez: Open Consultation on Planting and Management Plans

After having first consulted Ward Councillors, the Council will then follow an 'open consultation' process to alert residents and stakeholders (including Housing, Highways and Parks Managers) on:

- proposed new tree-planting schemes,
- replacement planting that would alter the character of an area,
- tree-management plans for key open spaces, or
- for any tree works within a Conservation Area.

The Council will use proportional and accessible engagement methods, including: highlighting any proposals as 'consultations' on the Council website; and allowing at least 20 working days for response before a decision is reached.

Where objections cannot be resolved at Officer level, decisions will be referred to the relevant Executive Councillor. In making a determination, the Councillor must consider both the amenity value and likely impact of the proposed works, and whether these are justified in light of the reasons for and against.

How to start to fix this: 2

Start the text for E1 in 'Engage more' by adding a sentence linking to the minimum standards in the previous Strategy:

→ Minimum standards for publishing works, inviting public scrutiny and consulting on major changes to the urban forest will be set out in policies under Engage more, building on the three-tier framework (Notifications, Public scrutiny, and Open consultation) that had established in the 2016–2026 Tree Strategy.

Officer comment: Standards for consultation on new planting, replacement planting that may alter local character, and management plans for key open spaces are set out in the supporting Topic Papers and planting guidance. These require consideration of amenity, local character and equity, and proportionate engagement where proposals would materially affect communities. These

commitments have not been removed since the 2016 Strategy but are in Topic Papers to keep the core Strategy concise. No change is proposed.

8. Clarify the scope and limitations of Council control

The 2016 Strategy is clear that not all urban trees are under direct City management, differentiating where the Tree Team manages trees on behalf of others (e.g. County street trees, housing land, car parks) and where it simply advises. Although this draft Urban Forest Strategy notes that < 25% of Cambridge land is Council-owned and/or -managed and emphasises fragmented responsibilities, it does not clearly restate the specific **categories** of land. Nor does it address the balance between direct control, management by agreement and influence through policy and engagement.

Officer comment: The specific categories of land are set out in Topic Paper 1. The balance between direct control, management by agreement and influence is addressed throughout the Strategy and supporting Topic Papers. No change is proposed.

Why this matters

- These omissions muddy the limits of Council powers, especially where influence relies on partnership or regulation, and what the 'urban forest' really is, outside the Council estate.

Officer comment: What the 'urban forest' and 'urban forestry' are now defined in the Strategy. . In addition, the respective roles of direct control, management by agreement and influence through policy, regulation and engagement are set out across the Strategy and supporting Topic Papers. No additional changes are proposed.

- This risks obscuring both resource constraints and reasonable expectations about the Council's capacity to improve canopy cover on land it does not own.

How to fix this: 1

In the subsection under 'Limitations' called 'Fragmented responsibilities' (p. 18), **extend** the paragraph as follows:

→ Due to less than 25% of land in Cambridge being under Council ownership and/or management, our direct control over the urban forest is limited. The Tree Team directly manages trees in parks and open spaces, communal housing land and other Council-owned sites, and currently manages certain street trees on behalf of Cambridgeshire County Council (through agreement). On other land, including private gardens, institutional estates and some highway and utility land, the Council's role is primarily to influence through:

- policy;
- partnership;
- guidance and regulation (e.g., Tree Preservation Orders and planning conditions).

Officer comment 1 of 2: Some clarity of 'Fragmented responsibilities' has been lost in edits. As the Strategy is a policy document, we can't use policy to directly influence outcomes but we can make policy as to how the Council will seek to influence outcomes.

How to fix this: 2

Under the heading 'Who should use this Strategy', immediately following the list on p. 8 **add** this sentence:

→ Together, these diverse audiences reflect the crucial reality that Cambridge's urban forest extends well beyond the trees the Council owns or directly manages. Achieving the aims of this Strategy depends on coordinated action across all of these sectors.

Officer comment 2 of 2: As above this point is also well made. To limit additional wording in the main Strategy, a minor amendment will be made to the ‘Fragmented responsibilities’ section to explicitly reference private landowners, rather than duplicating this point elsewhere.

9. Bridge the gap between 2016 and draft Strategy policies

The 2016 Strategy numbers and defines a full list of policies that have been used for many years. The draft Urban Forest Strategy introduces new policy groupings without explicitly stating which existing policies are being superseded, preserved, or translated. The draft Urban Forest Strategy does not cross reference existing commitments (e.g., emergency-response times or public-engagement thresholds).

Why this matters

- It may create uncertainty for residents, partners and even Officers about whether familiar relied-on commitments (e.g., GM3–GM7, WP7) will continue to apply, or have been altered, or are intended to be replaced by new wording.
- Some important policy elements may have been lost (‘orphaned’).
- This could complicate interpretation during any transition period.

How to fix this: 1

In the ‘Status of the Strategy’ section (p. 8), **add**:

→ This Urban Forest Strategy replaces the Citywide Tree Strategy 2016–2026 as the Council’s overarching policy framework for trees. Key service standards and procedures from the previous Strategy (e.g., emergency-response times, inspection practices and public-engagement mechanisms) have been reviewed and – where appropriate – updated and incorporated into the policies and Topic Papers that support this Strategy. During implementation, the Council will maintain clear cross references so that staff, partners and residents can see how previous commitments have been carried forward or updated.

Officer comment: Building on the 2016 Tree Strategy the UFS has been developed to improve the protection and enhancement of Cambridge’s urban forest. The UFS replaces the Tree Strategy and therefore should be read as the current operative strategy. Extensive consultation has been carried out, in part, to ensure that none of the still pertinent commitments presented in the Tree Strategy have not been left out. No change proposed.

How to fix this: 2

At the start of the draft Strategy’s appendices (p. 43), after the ‘Topic papers’ heading, **insert** a brief note referring to inherited standards:

→ Several Topic Papers incorporate and update operational practices from the 2016– 2026 Citywide Tree Strategy, including risk management, inspection cycles, emergency response and public engagement. This ensures continuity of good practice while aligning with the broader urban forest approach set out in this Strategy.

Officer comment: This recommendation has been incorporated under “Why Do we Need A Strategy” where an explanation of the use of Topic Papers has been added.

How to fix this: 3

Ensure that clear cross references are easily publicly accessible, so that residents, partners and staff can see how previous commitments have been carried forward or updated (including where these have been superseded). My Appendix 1 to this feedback seeks to map the 2016 policies onto the current draft Urban Forest Strategy policies – this may provide a decent *start*.

Officer comment: Officer comments to these points are made later in this response document, where appropriate.

How to fix this: 4

my Appendix 2 to this feedback, which highlights where some possibly significant 2026 Tree Strategy elements seem to have been ‘lost’, and also suggests how to ‘retrieve’ them.

Officer comment: Officer comments to these points are made later in this response document, where appropriate.

10. Link canopy targets better to planning control

Review The draft Urban Forest Strategy cites a canopy target (minimum 20% by 2050 – but **is that really enough, in the context of the Treeconomics 3-30-300 Rule?**) and notes the lack of a citywide canopy target in currently adopted planning policy.

Officer comment: The rationale for the 20% canopy ambition by 2050 is set out in Topic Paper 12. The Strategy seeks to strengthen alignment with emerging Local Plan policy where possible. No change is proposed..

However, the 2016 Strategy is better tied to development control policies and practical management of trees on development sites. This draft Strategy should more clearly state how its canopy ambitions will be embedded in development management decisions, pending full adoption in the Greater Cambridge Local Plan... the draft for which has also so *very recently* been under public consultation.

Officer comment: The UFS cannot embed commitment to trees in the emerging Local Plan which is led by the Greater Cambridge Shared Planning service and subject to statutory processes. For the commitments made in the UFS to be embedded in local plan policy, the Local Plan needs to reference the UFS. No change proposed.

Why this matters

- Without clear interim expectations for development, there is a risk that the canopy and equity ambitions remain aspirational rather than materially influencing development outcomes.
- This misses an opportunity to bridge current Local Plan policies (e.g., Policy 71) and the forthcoming policies (e.g., BG/TC) in the Draft Greater Cambridge Local Plan.

How to fix this: 1

In the text following the heading 'Aim 1: Increase canopy cover' (p.20) and also under the heading 'Protect more' (pp. 31–33) **add** the following explicit development-management text:

→ Until a citywide canopy target is formally adopted via the emerging Greater Cambridge Local Plan, the Council will use the principles and aims of this Strategy to guide development-management decisions, seeking to:

- Protect existing high-value canopy, particularly in areas of low provision or high vulnerability to the Urban Heat Island Effect;
- Secure high-quality replacement planting where tree loss is unavoidable, with adequate space and arrangements for both tree establishment and long-term care;
- Require new developments to contribute to overall canopy enhancement in line with both this Strategy’s 20% canopy ambition by 2050 and the emerging Greater Cambridge Local Plan policies.

Officer comment: Topic Paper 9 sets out how canopy ambitions can be achieved through development management. Tree planting alone cannot achieve canopy cover targets without preserving existing trees and their canopy also. The UFS along with its Topic Papers aids Draft Local Plan canopy targets by providing the guidance on how to do so. No change proposed.

How to fix this: 2

Under “Policy Gaps” in Limitations (p. 19), strengthen the commitment by **adding**:

→ While the benefits of trees are well evidenced, not all tree-related decisions are governed by clear local planning policies. There is currently no adopted citywide canopy-cover target, although the Draft Greater Cambridge Local Plan would address this, through Policy BG/TC. Until that policy has been adopted, the Urban Forest Strategy will provide the primary planning and design framework for protecting and enhancing canopy cover across the city.

Officer comment: UFS has been updated to include reference to canopy targets in emerging strategies.

11. Make canopy targets meaningful at the local level

Thinking of the neighbourhood with which I am most familiar (the northern half of Petersfield), the draft Urban Forest Strategy could be strengthened by addressing ward- and neighbourhood-level issues much more explicitly.

Officer comment: This information is detailed in Topic Paper 10. It was always intended to be presented in the UFS in the form of maps in the final versions.

Why this matters

- Failing to address these concerns about how ‘Protect more’ and ‘Plant more’ could be **implemented** in practice in highly built-up inner city neighbourhoods like north Petersfield risks making too much of this draft Strategy seem aspirational, meaningful only in *other* areas.
- This would only **increase** local “pressure on healthcare, social inequality and pressure from development on ecosystem services.” (draft Urban Forest Strategy, p. 6)
- These suggested changes keep the citywide strategy intact while making Cambridge's inner urban realities and opportunities **evident** in the text, and also providing a clearer ‘hook’ for local projects in neighbourhoods like north Petersfield.

How to fix this: 1

Under Challenges (p.16) in ‘Benefits, Challenges and Limitations’ add:

→ “In inner-city urban wards, canopy cover varies greatly between adjacent areas – even where there may be a relatively high *mean* canopy height. Narrow streets, small gardens and limited public open space restrict easy opportunities for traditional street trees, placing even greater emphasis on the value of boundary trees, communal courtyards and institutional land (for example in schools and housing estates) to deliver vital shade, essential cooling and crucial public amenity.”

Officer comment: This principle is covered in Plant More policies and supporting Topic Papers. No change is proposed.

How to fix this: 2

In the 1st numbered section under Delivery Opportunities (p. 22), after the text pertaining to spatial targeting, add:

→ “Priority will be given to micro areas within low- or average-canopy wards (i.e., where canopy cover and/or canopy height are low). Here, the Strategy will focus on small-scale, high-impact interventions: planting in school grounds, in pocket parks and in housing courtyards, while also actively seeking to secure new street trees.”

Officer comment: As above this principle is already reflected within the ‘Plant More’ delivery approach and supporting Topic Papers. No change is proposed.

How to fix this: 3

To the text on p. 28, pertaining to Tree protection, add:

→ “We will use ward-level data to review whether existing protection in dense inner wards adequately covers trees that provide significant cooling and shelter in streets with limited public open space. We will work with residents and landowners to identify boundary and courtyard trees of high local value and consider appropriate long-term protection where this aligns with wider planning policy.”

Officer comment: This concept is covered in Policy P1 and Action 3, which focus on targeted protection informed by local data and engagement with residents and landowners in areas of greatest need. No change is proposed.

How to fix this: 4

To the text under POLICY PL1 (p. 33) add:

→ “Along inner-city terraces – focus on: infill planting in existing small open spaces; planting and retaining trees in school and church grounds; encouraging tree planting in front and rear gardens where space allows; and securing street or courtyard trees as part of redevelopment.”

Officer comment: As above

How to fix this: 5

To the text on POLICY E1 (p. 34) add:

→ “Neighbourhood pilots will be used to test different delivery models in contrasting contexts, including a pilot in an inner-city ward to explore how residents, schools and housing providers can collectively increase canopy in a densely built-up terraced areas, with limited public land.”

Officer comment: The UFS cannot make commitments to specific projects that require additional resources or funding not yet secured. This principle is however covered in Policy E1, Actions 3, Action 6 and Action 8 which support partnership working in different neighbourhood contexts. No change is proposed.

12. Understaffing and over-reliance on volunteers is risky

On understaffing: commitments embedded in this draft Strategy largely would create significant additional pressure on a small, already-stretched staff. Formal service standards for inspections, response times and enquiry handling would demand tighter logging and monitoring, perhaps forcing reductions in ‘discretionary’ work – unless capacity were to increase. Strengthened notification and consultation procedures would add administrative workload, also likely requiring either extra support or reprioritisation. A tiered inspection regime with KPIs would increase tracking and reporting workloads, although appropriate use of AIs could reduce this admin work.

Why this matters

- Key objectives of the draft Urban Forest Strategy may be at risk.
- Scaling back activities risks missing standards, consultation delays and increased stress on the arboricultural team.

How to fix this: 1

Reliable delivery of all objectives may require additional arboricultural and administrative staff.

Officer comment: Agreed, but this is over and above that presented in Action 8, the strategy cannot commit to additional resources. The UFS cannot commit to additional staffing or resources beyond those currently approved; however, it is intended to provide an evidence base to support future business cases and external funding bids where opportunities arise. No change is proposed.

How to fix this: 2

Building a comprehensive, publicly accessible urban-forest inventory and valuation may exceed staff capacity, but project funding or external partners could make a significant difference.

Officer comment: Agreed, this concept is embedded into the UFS and supporting Topic Papers. No change is proposed.

On over-heavy reliance on volunteers: The draft Urban Forest Strategy leans most on community and volunteer effort under ‘Engage more’ and also in some policy delivery and partnership sections. While using volunteers and community partners to enhance delivery is reasonable, this draft Strategy implicitly leans on us (i.e., community volunteers) to underpin core planting, equity and aftercare outcomes. This is risky given acknowledged funding and staffing constraints and the unequal capacity of different communities to contribute.

In a bit more detail:

Officer comment: Engagement is not only concerned with managing or relying on volunteers but is also concerned with collaboration and giving the public the information, guidance and support required to promote and actuate self-help. If every garden owner with room to plant a tree did, canopy cover targets could easily be met (surpassed). The UFS does not rely on volunteers to deliver aims; community action is intended to complement Council activity and help extend reach where communities are able and willing to participate.

(a) Throughout the draft Strategy, every instance of the word ‘stewardship’ is associated with shared / partnership /community... while this is reasonable in proportion, the draft Strategy lacks clear specification of Council-led mechanisms for managing long-term stewardship to ensure e.g., new trees are surviving. A long-term, legacy view, perhaps associated with planning conditions for funding to resource the local authority to ensure long-term compliance, ideally via a holistic management scheme for public and private spaces.

(b) "Delivering in Partnership" (pp. 27–28) emphasises cross-sector collaboration, as best practice supports shared stewardship and partnership working.

(c) Policies PL1, PL2, E1 and E2 refer to “partnership engagement”, “joined up approaches”, “donations and sponsorship”, stressing working with communities and businesses to extend capacity by drawing on donations and/or sponsorship and community energy.

(d) Action 3 (equity), Action 6 (shared stewardship) and Action 8 (capacity and resourcing) all assume community planting, sponsorship, volunteer aftercare and third-sector partnerships as core delivery tools. This has worked in initiatives such as ‘Free Trees for Babies’ and ‘Neighbourhood Canopy campaigns’ that add trees and build support while engaging residents who have the time, space and energy to participate.

(e) This draft Strategy notes (p. 19) decreasing internal funding and human resources, and presents both external funding and project management as “essential to successful project delivery”.

Why this matters

- Risks arise wherever reliance on volunteers substitutes for core capacity.
- If partners are assumed rather than secured, key programmes (for example large-scale planting in low-canopy neighbourhoods) may be under-delivered.
- If “extending capacity” via partners is needed to meet core planting and engagement outcomes, delivery of equity-focused objectives are vulnerable to volunteer availability and charitable funding patterns – can this be acceptable?

- Priority areas may well coincide with communities with fewer resources, less spare time and less capacity to volunteer; most seriously: relying on all communities to ‘self-deliver’ planting and aftercare jeopardises the 20% canopy target and could reinforce existing inequities.
- As the Friends of St Matthew’s Piece learned swiftly over the very dry spring and summer of 2025 while tending its newly planted EIP-funded community orchard on York Street, young trees have demanding needs for both adequate and consistent watering (as well as routine maintenance). If, through this emerging Strategy, responsibility for this is pushed *too far* onto volunteers with inadequate Council-based support, tree-establishment failure would undermine crucial climate and biodiversity objectives.
- If external funding and project management truly are “essential to successful project delivery”, that reflects a structural reliance in this draft Strategy on external/volunteer capacity for core delivery... not just as ‘nice to have extras’; this must be unreasonable at least insofar as obligations like risk management, equity in canopy cover, and delivery of long-term climate resilience. And yet...
- **Aim 1: to increase canopy cover (20% by 2050):** If community-led planting and sponsorship lag (e.g., where constrained by cost-of-living pressures or volunteer fatigue), the citywide canopy target (particularly gains in low-canopy wards) is at risk.
- **Aim 3: Ensure equitable access to benefits:** Areas most in need of shade and cleaner air may have least capacity to mobilise volunteers; over-reliance on community resource is plainly structurally misaligned with the principle of environmental justice.
- **Aim 6: Shared stewardship and participation:** If the Tree Team lacks staff time for facilitation, support and communications, community and volunteer schemes are likely to be sporadic, short lived or concentrated in affluent areas – thus *undermining* the stated ambition of 'shared stewardship'.

How to fix this:

Realistic resources must be proportionate to and aligned with responsibilities and commitments.

Officer comment: If the strategy vision was overly influenced by what internal resources are currently available, it would necessarily be far less ambitious and its focus would be health and safety, legal and financial risk and, trying to maintain existing canopy cover. But, as the strategy explains, this is not enough. We must therefore acknowledge that funding and capacity has its limits and supplement resources externally if we are to enhance canopy cover meaningfully. Using volunteers is only one of the external resources used and the majority of external aid has come in the form of grant funded projects, that have successfully contributed to canopy cover targets. Increased funding and staffing would absolutely reduce reliance on external resources but with 75% of land being in private ownership, canopy cover targets would still rely heavily on resident participation.

Appendix 1: Policy number mapping & suggested associated wording tightening

Manage More (M1–M5)

Draft UFS policy

M1: Prioritise legal and H&S obligations, structured risk-based inspection and maintenance, emergency response, proportionality.

Closest 2016 policy/ies

WP1 (prioritise legal obligations); WP2 (risk management and inspection system); WP5–WP7 (cyclical maintenance, reactive works, emergency response).

Key tightening / missing clauses to import for ‘Manage More’ policies

1) Import explicit reference to the **3-year inspection / maintenance cycle** for parks and communal housing trees, or state minimum inspection frequencies, as in WP5, so ‘structured, risk-based inspection’ is not purely generic.

- 2) Reinstate the 90-minute emergency response standard from WP7 (even as 'aim to') to avoid weakening expectations.
- 3) Carry across the four inspection levels (walk-by, basic, detailed, advanced) and the 'competent person' definition from WP2, either in the policy or by cross-reference to Topic Paper 1, to anchor what 'risk-based' means in practice.
- 4) Preserve the statement that legal/statutory duties and tree safety take precedence over all other aspects of the service (WP1) by adding a short bullet to M1, so this is not softened by the more general 'balancing' language.

Officer comment: Operational and technical obligations are now located in the Topic Papers to maintain a more concise core document. Topic Papers nevertheless form part of the strategy and set out the necessary service standards and commitments, including inspection cycles, competence requirements and emergency response arrangements. No change is proposed.

Draft UFS policy

M2: Pests and diseases, follow government/best-practice advice, biosecurity, proportional and evidence-led responses, diversification.

Closest 2016 policy/ies

Parts of WP2 (risk; plant health), plus background text on plant health in Part 2.

Key tightening / missing clauses to import for 'Manage More' policies

- 1) Add an explicit commitment to '**maintain high standards of biosecurity**' and to avoid high-risk planting or sourcing routes, echoing Topic Paper 3 and the 2016 Strategy's discussion of pests and disease.
- 2) Add that Tree procurement should be thru **plant-healthy UK** nurseries (where necessary, any imports should be quarantined by the vending nursery before planting out here), and there should be a 'Maintenance & Defects Period' of 3-5 years for new plantings.
- 3) To minimise risk, specify that new avenues of trees should **not** be of a single species, but of a number of different species that grow to a similar habit – with the appearance a single avenue – allowing the boulevard to remain in place, if disease were to strike.
- 4) Requiring structured pest/disease **monitoring and recording** (e.g., in EzyTreev) so this is not just reactive.

Officer comment: As Topic Papers form part of the strategy and make the necessary operational commitments amendments it is not necessary to repeat text in the core document, Topic Paper 3 sets out our protocols around biosecurity And reference the Plant healthy Scheme. No change is proposed to the core policy wording.

Draft UFS policy

M3: Trees, Damage and Subsidence – manage mitigation requests/claims with hierarchy, robust evidence, work with insurers and residents.

Closest 2016 policy/ies

2016 section 3.3 'Trees and Subsidence' and related policies (likely in GM/other WP sections – continues beyond extracted text).

Key tightening / missing clauses to import for 'Manage More' policies

- 1) Import the **explicit evidential standards**: requirement for appropriate investigations, monitoring and engineering options before felling, as in the 2016 Strategy's subsidence section, to avoid claims being handled on *ad hoc* 'robust evidence' alone.

- 2) Reinstate that alternatives (e.g., pruning or engineering) **must** be fully explored before consideration of tree removal proposals – not just ‘considered’ – to avoid introduction of a softer hierarchy than in the 2016 Strategy.
- 3) Add to M3 a clear and firm statement about the Council not accepting speculative or weak insurance claims – to deter opportunistic applications that risk the loss of high-value trees (as has been seen in 25/0432/TTPO, 24/0413/TTPO, 23/0119/TTPO, and 22/0271/TTPO – all in relation to the **same** three TPO’d trees).
- 4) Add a short **hierarchy**: surveillance → containment → phased replacement, to mirror the clear mitigation hierarchy used for subsidence in WP/GM, when an insurance claim or concern is raised about subsidence allegedly caused by a Council-owned tree.

Officer comment: As the Topic Papers form part of the strategy and set out the necessary operational commitments, it is not necessary to repeat detailed protocols within the core Strategy. The evidential standards and mitigation hierarchy for subsidence are set out in Topic Paper 4, which has been independently reviewed by a specialist barrister. No change is proposed to the core policy wording..

Draft UFS policy

M4: Capacity and Resourcing – maintain skills, systems, budgets, seek external grants, review capacity regularly.

Closest 2016 policy/ies

2016 sections 2.2–2.7 (Tree Team structure, EzyTreev, framework contracts) plus implicit resourcing in WP1–WP7.

Key tightening / missing clauses to import for ‘Manage More’ policies

- 1) Consider importing the **minimum arboricultural staffing expectation** from the 2016 Strategy's descriptive text (three FTE arboriculturists covering both regulatory and management functions) as a benchmark, even if phrased as ‘will ensure staffing levels remain at least commensurate with...’

Officer comment: The Strategy cannot be used to make a specific commitment to staffing levels as these are subject to annual budget-setting and corporate workforce processes. However, the UFS is intended to provide the strategic case for maintaining appropriate capacity and for seeking external funding where opportunities arise. No change is proposed.

- 2) Add an explicit clause that the Council will maintain a **single live corporate tree inventory** (EzyTreev) for all council-managed trees as a condition for safe management, mirroring the 2016 Strategy.
- 3) Include the requirement that contractors are appointed via a **quality-assured framework** and that arboricultural work is undertaken only by suitably qualified, insured contractors.

Officer comment: As Topic Papers form part of the strategy and make the necessary commitments it is not necessary to repeat the protocols set out in Topic Paper 1 and Topic paper 6. No change is proposed.

Draft UFS policy

M5: Trees on Housing, Tenanted, Leased Land and other council land – responsibilities for communal housing land, tenanted gardens, leases; oversight by Tree Team.

Closest 2016 policy/ies

WP3 (review management of trees not directly managed by Tree Team); 2016 text in 2.2 and later sections on tenanted land and Property Services.

Key tightening / missing clauses to import for 'Manage More' policies

- 1) Tighten the wording around **tenanted gardens**: import the 2016 Strategy's expectation that tenants must maintain trees safely and comply with legal protections, and that the Council may take enforcement action where risk or statutory breach arises.
- 2) Strengthen 'will liaise with the Tree Team where arboricultural expertise is required' to '**must** seek Tree Team advice before commissioning or approving significant tree works or alterations', to avoid fragmentation.
- 3) Consider a clear commitment, as in WP3, that the Council **will review and bring into a consistent regime** all trees on land it owns or manages (including property and car parks) within a defined timescale.

Officer comment: Tenants obligations are set out in tenancy agreements. The strategy cannot enforce tree maintenance as suggested above or demand cross service consultation. The UFS provides strategic direction and guidance, with operational responsibilities and protocols set out in the relevant Topic Papers and service procedures. No change is proposed..

General: wording tweaks for Manage More

- Replace some 'will work to seek an appropriate balance' style phrases with '**will** balance' or '**must** demonstrate how it has balanced...', so the duty to weigh risks versus amenity is operationalised, as in WP2.
- Where retaining 'will aim to' (e.g., emergency response times), justify it in Topic Paper 1 but keep **at least one explicit standard**, so no regression from 2016 practice.

Officer comment: The point about avoiding regression from the 2016 Strategy is noted. Operational standards and service-level commitments are set out in the supporting Topic Papers, particularly Topic Paper 1, to keep the core Strategy concise while retaining necessary detail. The "Manage More" section and Policy M1 strengthen the 2016 position by explicitly prioritising legal and health and safety duties and requiring proportionate risk management alongside retention of healthy trees. While some wording retains professional judgement, the requirement to demonstrably balance duty of care with amenity and long-term canopy benefits is embedded in Policy M1 and Topic Paper 1. Emergency response standards, inspection frequencies and competence requirements continue to apply and are not weakened by the UFS; they are carried forward in Topic Paper 1 rather than restated in the core Strategy. No change is proposed.

Protect More (P1–P6)

Draft UFS policy

P1: GCSP's regulatory powers efficiently protect amenity trees and secure replacement planting; consult Council Tree Team when council trees at risk; structural planting to be TPO'd.

Closest 2016 policy/ies

Part 1 of 2016 Strategy, especially policies on TPOs, conservation areas, and use of planning powers (WP equivalents in Part 1).

Tightening / import suggestions for 'Protect More' policies

- 1) Import the **criteria for TPO expediency and amenity** from the 2016 Strategy's Part 1 policies, so 'efficient use' is not too discretionary.

Officer comment: As Topic Papers form part of the Strategy and set out the necessary operational guidance, it is not necessary to repeat detailed TPO criteria in the core Strategy. The criteria for expediency and amenity are set out in Topic Paper 9. No change is proposed..

2) Tighten 'where appropriate' around replacement planting: specify that replacement is normally required **at least on a 1:1 basis or better** – unless clear justification is documented, echoing 2016 practice.

Officer comment: The UFC cannot make requirements over and above the Local Plan but it can and does offer the guidance required to inform proportionate and considered decisions and conditions in line with the merging Local Plan. No change is proposed.

3) Add a clause that new TPOs will normally be considered **proactively** in response to canopy loss analysis, not only reactive to threats, to carry forward the more strategic tone of the 2016 Strategy's.

Officer comment: The UFS cannot commit to action without the necessary resources. This principle is reflected in Topic Paper 9, which sets out the approach to proactive TPO consideration informed by canopy loss evidence. The intent to review protection in response to canopy change is captured within Policy P1. No change is proposed to the core policy wording.

Draft UFS policy

P2: Resist removal / excessive works to trees without robust justification; TPO apps lacking evidence not validated; CA works resisted without justification.

Closest 2016 policy/ies

2016 Part 1 policies on TPO decision-making and conservation area notifications (including thresholds and justifications).

Tightening / import suggestions for 'Protect More' policies

1) Import any **explicit refusal tests** from the 2016 Strategy's policy (e.g., 'will normally refuse applications that...'), and mirror that language here to avoid a weaker, purely procedural 'will not be validated' focus.

Officer comment: This point is addressed through the combined use of Topic Papers 9 and 2. Topic Paper 9 sets out the statutory and planning control framework for assessing tree work proposals, while Topic Paper 2 provides practical guidance on the types of reasons for tree works that are likely to be supported or resisted in principle. To strengthen clarity and usability for applicants and decision-makers, a cross-reference will be added in Topic Paper 9 to the "Reasons for Tree Works" section in Topic Paper 2. This improves transparency without duplicating guidance or adding new policy requirements.

2) Add a requirement that arboricultural evidence must comply with recognized standards (e.g., BS5837, appropriate professional qualifications), as implicit in the 2016 Strategy's text.

Officer comments: The appropriate professional standards are included in Topic Paper1, BS 3998 and Topic Paper 9 BS 5837. The core policy cannot require information over and above that required by the Tree Work Application Form requirements, but the topic papers can provide guidance on the quality and standards of evidence to support decision-making. No change is proposed.

Draft UFS policy

P3: The Council will pursue enforcement / prosecution where protected trees are damaged or destroyed; using tools e.g., CAVAT.

Closest 2016 policy/ies

2016 Tree Protection, Damage and Compensation policies (later in Part 2 / appendices).

Tightening / import suggestions for ‘Protect More’ policies

- 1) Import the **stepwise enforcement process** from the 2016 Strategy: investigation → formal warning → prosecution / direct action → recovery of costs, so P3 reads as an operational commitment, not just an *intent*.
- 2) Reinstate any 2016 Strategy statement that the Council will also seek **replacement planting notices** (where powers exist), so enforcement is tied to restoration of canopy.

Officer comments: The UFS cannot impose greater enforcement than that detailed in GCSP’s Enforcement Policy. Planning Compliance powers are set out in Topic Paper 9 and including powers of enforcement and the serving of Tree Replacement Notices.

Draft UFS policy

P4: Planning permissions will include appropriate tree preservation and planting provisions via conditions/TPOs, in proportion to development.

Closest 2016 policy/ies

2016 Part 1 policies on development control and ‘right tree, right place’ plus canopy targets.

Tightening / import suggestions for ‘Protect More’ policies

- 1) Add explicit cross-reference to **BS5837** and to the 2016 Strategy’s requirements for tree protection plans and arboricultural method statements, so ‘appropriate provision’ has a clear standard.
- 2) Consider importing the 2016 Strategy’s expectation that **viability arguments** do not normally justify avoidable tree loss where standards can be met.

Officer comments: Both these points are included in Topic Paper 9. As Topic Papers form part of the Strategy and contain these commitments it does not need to be repeated in the core policy wording.

Draft UFS policy

P5: Aspirational review of existing TPOs, use area orders, periodic updating.

Closest 2016 policy/ies

2016 statements about TPO coverage and need for review (if present) plus appendices on existing coverage.

Tightening / import suggestions for ‘Protect More’ policies

- 1) Tighten ‘will seek to review’ by adding at least a **priority list** (e.g., ‘starting with area orders older than X years’ or ‘wards with highest canopy loss’), drawing from the 2016 Strategy’s emphasis on canopy mapping.
- 2) Consider adding that reviews will be informed by **canopy-loss hot-spots** and Tree Equity mapping, to embed a new evidence-led approach.

Officer comment: Policy P5 includes a priority list that will be applied with reference to canopy change and loss. Point 2 is included in Topic Paper 9. As Topic Papers form part of the Strategy and contain this evidence lead-approach it does not need to be repeated in the core policy wording.

Draft UFS policy

P6: Protecting public tree assets; enforcement and compensation where council trees damaged.

Closest 2016 policy/ies

2016 Appendix / policy on damage to public trees and recovery of CAVAT/CTLA value.

Tightening / import suggestions for ‘Protect More’ policies

- 1) Import the 2016 Strategy's statement that **unauthorised works to council trees** may result in removal of permissions/licences or recovery of full reinstatement costs – to strengthen deterrence.
- 2) Add that the Council will normally require **like-for-like or better replacement** *in addition to* financial compensation as determined by full and correctly performed CAVAT assessments (cf the two 03/02/26 uploads to the Planning Portal for 25/0432/TTPO regarding CAVAT valuations pertaining to that application).

Officer comment: The approach to unauthorised works to Council-owned trees, enforcement, compensation and restoration is set out in Topic Paper 11, which forms part of the Urban Forest Strategy. Topic Paper 11 establishes that unauthorised damage to Council trees may be pursued where legally available. That amenity value (normally assessed using CAVAT) and direct replacement or remedial costs may be recovered in line with the polluter pays principle, and that restoration planting may be sought where appropriate to reinstate canopy and amenity value. As these operational commitments are set out in Topic Paper 11, it is not necessary to restate this level of detail in the core policy wording.

- 3) These protections and enforcement standards must apply to **any** TPO'd tree, not only Council-owned trees

Officer comment: The legal procedures for enforcement and prosecution differ when considering breaches involving TPOs, conservation areas and planning control or criminal or civil damage to Council-managed trees and therefore cannot be the same.

General: wording tweaks for Protect More

- Where the 2016 Strategy uses stronger verbs ('will refuse', 'will expect'), mirror that where the legal basis is clear; keep 'will seek to' only for truly aspirational elements (e.g., TPO review frequency).
- Avoid repeated 'where appropriate' around enforcement and replacement: in the 2016 Strategy, these powers are framed as the **default** response unless exceptional circumstances apply.

Officer comment: We've retained strong directive language where the Council has control, and only used aspirational wording where delivery depends on funding, land ownership or partners. Replacement and enforcement remain the default response unless justified otherwise. No proposed change.

Plant More (PL1–PL4)

Draft UFS policy

PL1: Encourage and seek new planting on public and private land; target large, long-lived species and diversity; prioritise low-canopy areas.

Closest 2016 policy/ies

2016 Part 1 policies on enhancement, 'right tree in right place', and consultation on new planting (GM7).

Tightening / import suggestions for ‘Plant More’ policies

- 1) Import explicit recognition of the **'right tree in the right place'** principle and reference to constraints (utilities, species suitability), which has strong public support in the 2016 Strategy and helps defend choices.

Officer comment: Topic Paper 2 gives clear guidance on planting and tree selection, following similar principles as ‘right tree in the right place’ however this guidance focuses on fitting the best tree to existing constraints, whereas the UFS guidance goes further, to ensure that the right space is created to allow more beneficial trees to be planted. No change is proposed.

2) Add a clause that **new planting schemes will have defined canopy gain objectives** (e.g., contribution towards the 20% by 2050 aim, or local canopy targets), linking back to the canopy-metric logic in Topic Paper 12.

Officer comment: The link between new planting and the long-term canopy ambitions is embedded throughout the strategy and topic papers. No change is proposed.

3) Include the 2016 Strategy's focus on drought/pollution-tolerant species for streets to keep that applied emphasis.

Officer comment: This is highlighted in Topic Paper 2 and does not therefore need to be repeated in core policy wording. No change is proposed.

Draft UFS policy

PL2: Aspirational funded establishment period of at least 3 years (watering, mulching, formative pruning).

Closest 2016 policy/ies

2016 text on establishment and aftercare (Part 2 and planting guidance).

Tightening / import suggestions for ‘Plant More’ policies

1) Tighten ‘will aim to ensure’ by stating that the Council **will not normally undertake new planting without an identified establishment budget and arrangements**, echoing the implied discipline in the 2016 Strategy.

2) Import quantitative watering guidance from the Council’s ‘Watering new trees’ webpage into Topic Paper 2, and cross-reference from PL2 so the commitment is measurable.

Officer comment: Policy PL2 already sets a clear aspirational expectation that new planting sites should be supported by a funded establishment period of at least three years, while explicitly recognising that delivery is subject to funding availability, land ownership and partnership arrangements. The Strategy cannot impose an absolute precondition on all planting activity without risking unintended constraints on delivery. No change is proposed.

Draft UFS policy

PL3: Replacement planting for any lost council-owned tree unless clear justification not to replant; allow off-site alternatives.

Closest 2016 policy/ies

GM2 (reluctant felling, replacement as close as practicable); GM7 (consultation on replacement schemes).

Tightening / import suggestions for ‘Plant More’ policies

1) Import GM2’s strong statement that the Council will not remove trees ‘**without good reason**’ allied by specifications for how these reasons should be documented, and explicitly tie this to PL3 so removal and replacement sit together.

Officer comment: Policy P2 will be amended to make it clear this policy refers to council trees also. No change is proposed to Policy PL3.

2) Add a preference for **on-site replacement** first, then ‘nearby’ within the same neighbourhood, and only *then* off-site substitution, mirroring GM2’s ‘as close as practicable’

Officer comment: On-site replacement planting relating to Development Management is captured in Topic Paper 9. For Council-owned tree stock outside development contexts, it is not proportionate or practical to require neighbourhood-level prioritisation in every case, given capacity and resource constraints. The Council manages its tree asset strategically at a citywide scale to maximise overall canopy and equity benefits. Accordingly, while the original site will normally be considered first for replacement, where this is not feasible replacement will be prioritised elsewhere in the city where it can deliver the greatest net benefit, rather than being limited to the immediate neighbourhood.

Draft UFS policy

PL4: Aspirational: explore engineered pits, rain gardens, structural soils in developments and highways.

Closest 2016 policy/ies

2016 guidance on engineered pits and structural planting (in Part2 / appendices).

Tightening / import suggestions for ‘Plant More’ policies

1) Import from the 2016 Strategy the more technical requirements (e.g., minimum soil volumes, avoidance of tree ‘planting pits’ that compromise longevity) into Topic Paper 2 and reference them here so PL4 has teeth.

2) Replace ‘will explore opportunities’ with ‘**will expect schemes of a certain scale/typology** to consider these options and justify alternatives’ – thereby retaining aspiration while adding a clear planning ‘hook’.

Officer comment: Not all sites are the same, and tree pits should be site specific. The UFS is not setting a standard to be met but provides guidance on the key elements of tree pit design. Topic Paper 2 includes technical requirements, maximising establish and longevity. Policy PL4 is therefore intentionally aspirational to encourage innovation where it is appropriate and feasible, without creating rigid expectations.

Engage More (E1–E4)

Draft UFS policy

E1: Facilitate sustainable and proactive management through public and partnership engagement; proportionate consultation.

Closest 2016 policy/ies

GM3–GM8 (notifications, public scrutiny, open consultation, escalation to Executive Councillor).

Tightening / import suggestions for ‘Engage More’ policies

1) Import the **three-tier engagement architecture** (notification, public scrutiny, consultation) from GM3– GM8, ideally as a short sub-policy or in Topic Paper 5 with an explicit cross-reference in E1, so that ‘engagement’ is structured – not *ad hoc*.

2) Retain the clear trigger from the 2016 Strategy that unresolved objections go to the **relevant Executive Councillor** (GM6, GM8), so decision-making appears (and is) less discretionary.

Officer comment: The consultation and escalation framework for Council-owned tree works previously set out in GM3–GM8 of the 2016 Tree Strategy is retained and updated in Topic Paper 1. No changes proposed.

Draft UFS policy

E2: Aspirational joined-up approaches via partnerships, sponsorship, donations.

Closest 2016 policy/ies

2016 consultation text (support for partnerships with voluntary bodies and community groups) and parts of GM7 (community involvement in planting plans).

Tightening / import suggestions for ‘Engage More’ policies

1) Add an explicit clause that partnership schemes must comply with the Council’s **technical standards and Tree Team sign-off**, to avoid variable-quality community planting that would undermine canopy health (a risk noted in the draft’s ‘Challenges’ section).

2) Consider referencing existing programmes (Free Trees for Babies, Neighbourhood Canopy Campaign) as the **default channels** for sponsorship rather than entirely new *ad hoc* schemes.

Officer comment: The importance of maintaining consistent technical standards and governance across partnership and community-led initiatives is recognised. To address this, the wording under Policy E2 will be clarified to make explicit that partnership activity involving planting or works to trees on Council land will align with the Council’s technical guidance and governance arrangements. This will strengthen quality assurance while retaining flexibility for diverse partnership models over the lifetime of the Strategy.

Draft UFS policy

E3: Aspirational – quantify benefits of the urban forest and create opportunities for community participation in valuation.

Closest 2016 policy/ies

2016 references to i-Tree and valuation methods (CAVAT/CTLA) in Part 1 and 2.

Tightening / import suggestions for ‘Engage More’ policies

1) Import the 2016 Strategy’s commitment to **using recognised tools** (i-Tree, CAVAT/CTLA) so the valuation framework is consistent over time and comparable (noting, per the two 03/02/26 uploads to the Planning Portal for 25/0432/TTPO on CAVAT valuations, the importance of such valuation tools being used correctly – to maintain credibility).

2) Tighten the link between **valuation** and **decision-making**: state that results will inform prioritisation, enforcement and communications, echoing the way the 2016 Strategy uses valuation to justify investment.

Officer comment: Policy E3 is intended to use established tools in proportionate, accessible ways to support engagement and citizen science, helping people and decision-makers better understand the many benefits of Cambridge’s urban forest and encouraging wider investment of time, skills and resources. E3 is not intended to focus on enforcement or regulatory decision-making. No changes proposed..

Draft UFS policy

E4: Provide clear, accessible information about tree management and planting via website, notices, consultation.

Closest 2016 policy/ies

GM3–GM4 (publishing planned works, explaining reactive works on request).

Tightening / import suggestions for ‘Engage More’ policies

1) Import the 2016 Strategy’s **20-working-day notice** expectation for planned works (GM3) and the 7-day response target for enquiries (GM1), or explain if and how these have been superseded.

Officer comment: The notice periods for planned works are now located in Topic Paper 1. These commitments have not been removed or weakened; they have been relocated to the Topic Papers to keep the core Strategy concise while maintaining continuity of service standards.

2) Add a commitment to maintain an **up-to-date online map/list of planned works and planting** (mirroring that given in GM3 via 2016 Strategy’s plan to deliver a ‘Planned tree works’ webpage), also upgrading from the 2016 Strategy by making the public-facing commitment line up with the Urban Forest Strategy’s emphasis on using live datasets, mapping tools and KPIs to plan and explain work on the urban forest.

Officer comment: These commitments have not been removed or weakened; they have been relocated to Topic Paper 1 to keep the core Strategy concise while maintaining continuity of service standards.

Appendix 2: Content not in draft UFS, but in 2016 Strategy policies

Appendix 2 is arranged according to the 2016 Tree Strategy policies, highlighting ‘orphaned’ content that has *not* been clearly carried through to the draft Urban Forest Strategy. It also suggests **how** such content could be brought forward into the draft Urban Forest Strategy by modest wording changes.

Summary of ‘orphaned’ 2016 elements

The key areas from WP/GM that are **not clearly embedded** in the draft Urban Forest Strategy to evaluate for re-insertion (either in Policies or in Topic Papers – with explicit cross-references):

1. The explicit **inspection architecture**: four inspection levels, competence requirements, and minimum recording standards (WP2).
2. The **three-year cyclical inspection/maintenance** commitment for parks and communal housing trees (WP5).

Officer comment: These commitments have not been removed or weakened; they have been relocated to Topic Paper 1 to keep the core Strategy concise while maintaining continuity of service standards

3. Timebound **operational standards**:

- a. 90-minute emergency make-safe target (WP7).
- b. 7-day enquiry response benchmark (GM1).

Officer comment: These commitments have not been removed or weakened; they have been relocated to Topic Paper 1 and embedded in operational arrangements. The 90-minute emergency make-safe target is secured through the Arboricultural Framework 2025-2029, and enquiry response times align with the Council’s corporate service standards as set out on the Council’s webpages.

- c. 20-working-day pre-notification of planned works (GM3).

Officer comment: These commitments have not been removed or weakened; they have been relocated to Topic Paper 1 to keep the core Strategy concise while maintaining continuity of service standards

4. Clear **governance / intervention rules:**

a. Reverse Agency Agreement and responsibilities for highway trees (WP4).

Officer comment: These commitments have not been removed or weakened; they have been relocated to the Topic Papers to keep the core Strategy concise while maintaining continuity of service standards

b. Use of LGMPA 1976 s.23 and Highways Act for dangerous private trees (WP8).

Officer comment: These commitments have not been removed or weakened; they have been relocated to Topic Paper 2 to keep the core Strategy concise while maintaining continuity of service standards

c. Commercial event organisers' responsibilities and charge-back of facilitation works (WP9).

Officer comment: The WP9 principles have been retained in substance: Topic Paper 1 requires Tree Team advice for third-party projects affecting Council trees, consultation via the relevant service's protocols. Compensation for damage may apply via Topic Paper 11.

5. The **structured engagement model** and democratic check:

a. b. Public scrutiny and consultation triggers (GM5, GM7). Escalation of unresolved objections/consultations to the relevant Executive Councillor (GM6, GM8).

Officer comment: The three-tier engagement model from the 2016 Strategy has not been removed. These principles are now set out in Topic Paper 1 for Council-owned and managed trees, including publication of planned works, ward councillor notification, proportionate consultation, and referral of unresolved objections to the Executive Councillor. The core Strategy therefore avoids repeating operational detail, while the Topic Paper provides the clear procedural framework.

WP policies (risk, plant health, inspections)

WP1 – Prioritise legal obligations over all other aspects of the service

Mapped to: **M1** (legal and H&S obligations, risk-based inspection and maintenance

Status: **Substantively carried forward**, but softer.

• Tighten by:

o Re-stating that the Council “**will prioritise its legal obligations first over all other aspects of the service**”, not just “will prioritise legal and health and safety obligations”.

o Keeping this as a distinct first bullet under M1 so it is as prominent as in WP1.

M1 states “THE COUNCIL will prioritise its legal and health and safety obligations over all other aspects of the service”

Officer comment: Policy M1 already mirrors and strengthens the intent of WP1. Health and safety duties are a core part of the Council's legal obligations, and their explicit inclusion strengthens rather than softens the policy by making the duty of care and public safety dimension unambiguous. No change is proposed to the wording of M1.

WP2 – Risk management and inspections (NTSG principles, four inspection levels, recording, competence)

- Mapped to: **M1** and Topic Paper 1 (Tree Asset Management and Risk).
- Status: **Partly carried**, key details risk being diluted.
- At risk of orphaning:
 - o The **four defined inspection levels** (walkabout/drive-by, basic, detailed, advanced).
 - o Explicit data-recording requirements and use of **EzyTreev**.
 - o Clear requirement that inspection staff must be **competent and suitably qualified**.
- Suggested fix:
 - o Summarise the four levels and competence requirement in M1 itself, with a cross-reference to Topic Paper 1, so they remain policy not just background.

Officer comment: The inspection framework, competence requirements and recording standards are set out in Topic Paper 1, which forms part of the Strategy. To address concerns about the status of the topic papers, a new “Status of Topic Papers” section has been included in the core Strategy.

WP3 – Review management of trees not directly managed by the Tree Team

- Mapped to: **M5** (Trees on Housing, Tenanted, Leased Land and other council land).
- Status: **Mostly carried**, but the review commitment is weaker.
- Orphan risk:
 - o The explicit promise to **review and bring into a consistent regime** all Council trees outside the Tree Team’s direct control.
- Suggested fix:
 - o Add a clause to M5: **“The Council will review and, where necessary, bring into a consistent inspection and maintenance regime** all trees on land it owns or manages, including housing tenanted land, car parks and property holdings, within [X] years.”

Officer comment: The UFS does not commit to a timebound wholesale integration of all Council-owned trees into a single regime, as this would require additional resources and potential cross-service governance changes. However, the principle of consistent standards and Tree Team oversight is retained.

WP4 – Reverse Agency Agreement and funding for street trees

- Mapped to: delivery text on **Delivering in Partnership** and Targeting Canopy Change, but no explicit policy.
- Status: **Largely orphaned as a clear commitment**.
- Importance: Clarifies **governance, funding and liability** for a major share of the canopy (County highways trees).
- Suggested fix:
 - o Either: add a new **Manage More policy** (e.g. “M6: Street Tree Partnership”) restating the intent to secure a formal agreement with County Highways, or
 - o Fold the core commitment into M4 (Capacity and Resourcing): “The Council will work with Cambridgeshire County Council to secure a formal agreement for the management, funding and liability of street trees.”

Officer comment: The Strategy recognises the importance of street trees and the role of partnership with Cambridgeshire County Council as Highway Authority. However, the Council cannot commit unilaterally to securing a formal reverse agency agreement, as this depends on the agreement of another authority and on funding and governance arrangements outside the City Council’s control

WP5 – Three-year maintenance cycle for parks and communal housing trees

- Mapped to: **M1** and the “Planned maintenance cycles” narrative in Delivery.
- Status: **Principle carried but detail at risk.**
- Orphan risk:
 - o The explicit **three-year cycle** and its linkage to the legal duty of care.
- Suggested fix:
 - o Add a bullet under M1: “**The Council will maintain parks and communal housing trees on a three-year inspection and maintenance cycle**, or an alternative evidence-based frequency agreed through Topic Paper 1.”

Officer comment: The three-year cyclical inspection and maintenance regime for parks and communal housing trees, and its link to the Council’s duty of care, has not been removed. This is set out in Topic Paper 1, which forms part of the Strategy and provides the operational standards for inspection frequencies based on risk and site use. The detail has been intentionally located in the Topic Papers to retain operational clarity while keeping the core Strategy concise and flexible.

WP6 – Reactive maintenance in safety priority order

- Mapped to: **M1** (reactive maintenance) and emergency / monitoring text.
- Status: **Substantively carried** in general language.
- Minor tweak:
 - o Make clear that reactive works **safety-priority order**”, matching WP6 wording, to avoid a weaker “timely and **will normally be prioritised in proportionate**” formulation.

WP7 – Emergencies (90-minute make-safe target, procedures, duties for private trees)

- Mapped to: **M1** (emergency response) and Delivery text under Monitoring & Adaptation.
- Status: **Partly carried; performance standard orphaned.**
- Orphan risk:
 - o The specific **90-minute make-safe target** for high-risk emergencies.
 - o Clear differentiation between **immediate vs non-immediate danger**, and respective timescales.
- Suggested fix:
 - o In M1, retain at least an indicative standard: “Where a tree poses an immediate very high risk, the Council **will instruct make-safe works as quickly as practicable and will aim to do so within 90 minutes.**”

WP8 – Council intervention on dangerous private trees

- Mapped to: partly implied in **M3** and Delivery’s discussion of limitations and legal powers, but no explicit policy.
- Status: **Materially orphaned.**
- Importance: Sets clear expectations on when the Council will intervene on private land and refers to statutory basis.
- Suggested fix:
 - o Keep a short, explicit clause under M3: “The Council will only intervene directly on dangerous trees in private ownership where the danger is imminent, acting under s.23 LGMPA 1976, or will refer highway dangers to the County Council Highways authority.”

Officer comment: These matters have not been removed or weakened; they are now set out in Topic Paper 1, which forms part of the Strategy. Topic Paper 1 explicitly covers safety-prioritised reactive works, differentiation between immediate and non-immediate risks, emergency response, and the Council’s approach to dangerous trees on private land. The operational detail has been relocated to Topic Paper 1 to keep the core Strategy concise while retaining clear service standards and legal duties.

WP9 – Event tree risk (organisers’ responsibilities, charging for facilitation works)

- Mapped to: Delivery text on **Tree Planting and Removals Tracking** and partnerships, but not clearly.
- Status: **Largely orphaned.**
- Importance: Clarifies **commercial liability** and prevents unfunded event-driven works.
- Suggested fix:
 - o Add a short paragraph under **Engage More** or Topic Paper 1: “Commercial event organisers remain responsible for event-specific tree risk assessments and costs of non-routine facilitation works, in line with the Council’s existing practice.”

Officer comment: The WP9 principles have been retained in substance: Topic Paper 1 requires Tree Team advice for third-party projects affecting Council trees, consultation via the relevant service’s protocols. Compensation for damage may apply via Topic Paper 11.

GM policies (enquiries, consultation, public engagement)

GM1 – Enquiries (7-day response / inspection target, escalation path)

- Mapped to: **E4** (clear information about tree management) plus generic text on engagement.
- Status: **Response-time standard orphaned.**
- Importance: Sets a clear **customer service benchmark**. “For non-emergency tree-related enquiries, the Council **will aim**
- Suggested fix:
 - o Include in E4: **to contact the enquirer with an initial response or inspection outcome within 7 working days**; more complex cases will receive a holding response explaining extended timescales.”

GM2 – Tree removal: “no removal without good reason”, documented reasons, replacement as close as practicable

- Mapped to: **PL3** (replacement planting where council tree lost) and M1 narrative on balancing interests.
- Status: **Partly carried, but the strong presumption against removal risks dilution.**
- Orphan risk:
 - o The unambiguous statement that the Council “**will not remove trees without good reason**” and that reasons will be recorded.
- “**The Council will not remove trees without good reason and**
- Suggested fix:
 - o Add to PL3: **will document and record the reasons for all non-emergency removals,**” retaining GM2’s clarity.

GM3 – Notifications: all planned tree works published at least 20 working days before implementation; site notices

- Mapped to: **E4** (website, notices) and E1 (engagement), but **the 20-day minimum is not repeated.**
- Status: **Key time standard orphaned.**
- Suggested fix:
 - o In E4, include: “Planned tree works on Council land **will normally be published online and via site notices at least 20 working days before implementation**, except where works are strictly emergency or reactive.”

GM4 – Reactive works not published, but explanations on request

- Mapped to: E4/E1 in general terms.
- Status: **Principle carried implicitly**, but worth making explicit.

- Suggested fix:

o Add one sentence under E4: “Reactive safety works that cannot wait for the planned cycle **will not be subject to prior notification but the Council will provide explanations on request.**” *Cf also my prev comments in main text.*

GM5 – Public scrutiny triggers (healthy trees >75mm diameter at 1.5m h; significant character impact; process and timescales)

- Mapped to: **E1** (engagement) and general consultation language.

- Status: **Substantive architecture at risk of being orphaned.**

- Importance: Provides **clear thresholds** for when residents can expect to comment.

- Suggested fix:

o Either preserve GM5 almost verbatim in Topic Paper 5, with E1 cross-referencing it, or add a sub clause in E1: “The Council will invite public comment where proposed works remove healthy trees above [75mm] diameter or where works will significantly alter the character of an area, as defined in Topic Paper 5.” *Cf also my prev comments in main text.*

*Officer Comment: See comments at **POLICY Ey: Public Scrutiny of Significant Tree Works***

GM6 – Unresolved objections under public scrutiny decided by relevant Executive Councillor

- Mapped to: E1/E4 in spirit, but **decision route not explicit.**

- Status: **Decision-making safeguard orphaned.**

- Suggested fix:

o Add: “Where objections to significant tree works cannot be resolved by officers, decisions **will be referred to the relevant Executive Councillor** for determination,” keeping the democratic check from GM6.

GM7 – Open consultation (tree management plans, new planting, character-changing replacements; ward member first; Exec Cllr if unresolved)

- Mapped to: **E1–E2** and Plant More narrative.

- Status: **Structure partly carried; triggers and escalation at risk.**

- Orphan risk:

o Specific **consultation triggers** & link to Executive Councillor determination (GM8).

- Suggested fix:

o Make Topic Paper 5 carry the GM7–GM8 architecture, and in E1 state that the Council will follow those procedures for tree management plans and significant planting schemes. *Cf also my prev comments in main text.*

GM8 – All unresolved consultations determined by relevant Executive Councillor

- Mapped to: not explicitly referenced in UFS policies.

- Status: **Orphaned.**

- Importance: Mirrors GM6, giving a clear line of accountability on contentious schemes.

- Suggested fix:

o Combine with GM6 into a single clause in E1: “Unresolved objections arising from public scrutiny or consultation processes **will be determined by the relevant Executive Councillor.**” *Cf also my prev comments in main text.*

Officer comment: The consultation from the 2016 Strategy has not been removed. These principles are now set out in Topic Paper 1 for Council-owned and managed trees, including publication of planned works, ward councillor notification, proportionate consultation, and referral of unresolved objections to the Executive Councillor. The core Strategy therefore avoids repeating operational detail, while the Topic Paper provides the clear procedural framework

Appendix 3: General Editorial suggestion

For clarity and transparency, all figures should have a succinct legend or caption.
(For example... what/where is that tree in Figure 5 on page 5?)

All imagery is currently indicative and subject to layout, design and formatting

Officer comment: this will be addressed in the final document design, post Cabinet approval

Email 8.

The below internal comments were received in the form of a summary email with specific comments made directly on the draft UFS.

Having read through the draft Urban Forest Strategy, I think overall that it's a comprehensive and well written strategy. I've added some more specific comments in the draft strategy document, but I had some broader observations that I wanted to share with you that I think need addressing in the final draft:

- Length – xxxxxxxxxxxx like to see shorter strategy documents. Overall, the strategy is quite long (53 pages currently) and I'm not sure many people will read a document of this length fully. As an example, the Community Wealth Building Strategy is 25 pages long – it might not be possible to cut the UFS strategy to this length, but I'd encourage some robust editing to reduce its length. I've made some suggestions in my comments in the document, including:
 - Removing similar paragraphs (I've highlighted a couple of examples in my comments)
 - Combining the foreword, vision and introduction into a single shorter section
 - Combining the Delivery, Policy and Actions sections (currently 30 pages) into a single, more succinct section setting out what the Council will do to implement the aims/objectives of the strategy over the next five years.

Officer Comment: Largely by removing data that is repeated from Topic Paper and combining similar sections this has been achieved and the core document has been reduced to approximately 30 pages. The document is expected to be further reduced in length (but not content) during the design stage.

- Consistency – I've been reading and commenting on the draft Climate Change Strategy and UFS side-by-side and plan to look at the Biodiversity Strategy next week. As our key environmental strategies, these need to be a consistent suite of documents. At the moment, the 3 documents have very different structures, which is quite confusing, so it would be worth discussing with Guy Belcher and David Wright how the structure can be aligned more. For example:
 - UFS has a vision, 5 principles, 8 aims, 4 delivery approaches with 19 related-policies, and 8 actions (with a number of sub actions under each)
 - CCS has 7 goals, objectives under each goal, priority projects, and an action plan
 - BS has a vision, 7 strategic objectives and an action plan.

Officer Comment: While related and aligned, the three strategies are sufficiently different to make drafting consistency problematic.

- Data and visuals – the strategy currently has a lot of narrative text. It would be helpful to use maps, infographics and key data to illustrate the points that you make in the strategy and break up the text/narrative. Rather than listing the data sources and

reports that have been produced at pages 23-25, I would recommend pulling out the key points from these reports (in a visual form if possible) to illustrate the points made in the narrative.

Officer Comment: Some visuals have been included to indicate intention in this regard but the drafts have focused on the text. Visuals, maps and infographics will be added at design stage.

- Target – the strategy proposes an aspirational target of 20% increase in tree canopy by 2050. If the strategy is going to set a target, I'd recommend including this up front in the introduction or early in the document. It would be helpful to:
 - use the data available to indicate what the baseline is and what a 20% increase in coverage or number of trees would be.
 - Explain how we have arrived at a 20% target. Is this realistic, achievable or ambitious/stretching?
 - Reconsider the timeframe as 2050 is a long way away – the strategy runs to 2031 but the Council will cease to exist in 2028, so would we be better setting an aspirational target for 2031, with an interim target for 2028 (this is the approach adopted in the new CCS, so would be consistent)?

Officer Comment: While explained in Topic Papers 10 and 12 this has now been better explained in the core document

- One Council – in places, the strategy reads as a document written from the perspective of the tree/urban forest team seeking to influence the policies of the Shared Planning Service and GCP. The strategy needs to represent the unified view and actions of the council as a whole to improve the urban forest.

Officer Comment: As the location of arboricultural expertise in CCC, City Services is best placed to lead on Urban Forestry. Not all trees are the responsibility of CCC therefore it is necessary, for vision achievement, to work with our partner council services. Consultation with GCSP has been carried out to ensure that the UFS does not contradict GCSP policies and the UFS does not create any new service demands. However as the Local Planning Authority, it is the responsibility of Cambridge City Council to ensure that statutory responsibilities are carried out in accordance with the law and government guidance, that decision are proportionate and to minimise any financial or reputational risks.

- Jargon/technical terms – overall the document is clear and well-written, but in places it uses jargon or technical terms (e.g. blue and green infrastructure, arboricultural, sequestering, urban heat island effect) when plainer English or adding definitions could help make it more accessible to a wider audience. I've suggested alternatives in my comments, but xxxxxxxx may be able to review and advise.

Officer Comment: A glossary is provided with improved links

The following section sets out specific comments and, *in italics*, actions taken or explanations provided.

It would be helpful to explain in the Exec Summary (and potentially the introduction) that the Urban Forest Strategy, Biodiversity Strategy, and Climate Change Strategy have been deliberately developed, reviewed and consulted on in parallel and are “closely interrelated, share common evidence bases, and are intended to operate as a coherent policy framework rather than as standalone documents”

Officer Comment: Agreed, Executive Summary has been amended to incorporate this point.

Is this paragraph necessary? Would residents and stakeholders reading the strategy recognise this description of the roles of trees and see it as “beyond contestation”? I would suggest deleting this

paragraph and replacing it with a bulleted list of the wide range of benefits that trees bring (as set out on pages 14-15)

Officer Comment: The paragraph has been reduced, with reference to the above, but has been retained as an introduction.

We have included different population growth figures in our LGR proposal for Cambridge- 154, 500 in 2026, 161,000 2031, 165,500 in 2035, and 171,500 in 2041. Greater Cambridge would reach 405,500 by 2041. These figures were calculated for us by the Planning Policy team, based on development included in the 2018 Local Plan and the proposed Local Plan. Could you use these figures instead for consistency please?

Officer Comment: Figures have been updated in line with the above.

Jargon - is there a plain English alternative to arboricultural?

Officer Comment: Arboriculture is the accepted term for the study, management and cultivation of trees. A link will be provided to glossary.

I suggest this section [A Short History] could be moved up to the top of the “why do we need a strategy” on page 6, just before the bold paragraph that starts “The Urban Forest Strategy sets out....”

Officer Comment: This has been actioned.

It would be helpful to include a chart or an infographic to show how the number of trees or the tree canopy as a whole has increased in Cambridge since the 2008 baseline. It would also be helpful to include a map to show the geographical spread of the tree canopy (i.e. the LSOAs or wards that have denser or sparser tree canopy cover)

Officer Comment: Maps had not been added at the time of consultation but have now been included.

It would be helpful to have a sentence at the beginning of this paragraph (or earlier in the strategy) to explain what we mean by “urban forest” and why we are using this term rather than trees, as we have in previous strategies.

Officer Comment: This has been actioned.

Does this [approved] mean that the approach is approved by the Council or another body? If it's the Council, I suggest deleting this, as the strategy is a statement of the council's approach, so it would be slightly odd to say that we need approval from ourselves

Officer Comment: The point was to highlight that the strategy is approved but it is agreed it is not necessary.

This paragraph [1st in How to use the Strategy]. is similar to the first paragraph on page 9 (which begins “the core strategy concisely sets....” The two paragraphs could be combined here.

Officer Comment: The paragraph on page 9 is a conclusion so the wording been merged with the 1st paragraph in the section.

I've highlighted in yellow the policy references that seem most relevant/pertinent to the UFS (to a non-expert reader). If necessary, you could add these policy references to the policy list on page 7. The

other references in this section are more generic references to climate change that aren't specifically related to the urban forest, so I would suggest deleting these.

As currently drafted, this section is quite hard to follow, as there are lots of quotes from national planning policy and legislation, but there is no narrative to explain how the quotes and bullets relate to each of principles. You have already stated on page 7 that the strategy is consistent with local and national policies and listed the key policies, so I don't think you need to include all the detailed quotes and references here. I would suggest amending this page so that it simply lists the 5 principles, without all the policy and best practice bullets.

I've highlighted in yellow the policy references that seem most relevant/pertinent to the UFS (to a non-expert reader). If necessary, you could add these policy references to the policy list on page 7. The other references in this section are more generic references to climate change that aren't specifically related to the urban forest, so I would suggest deleting these.

Officer Comment: With reference to the above three points, the whole strategy has been amended to improve the narrative. Non-essential, references have been moved to end-noted, appendices and topic papers as appropriate. This has significantly reduced the length of the core document.

Would be helpful to add a sentence or two here [Health and Wellbeing] to explain how and why trees can have these benefits, based on the research.

Officer Comment: A link will be created to research.

As suggested on page 8, it would be helpful to include a map to illustrate the uneven distribution of tree canopy in Cambridge. If it appears on page 8, you could refer to it again here. Or you may want to include the map on this page instead.

Officer Comment: Map and other illustrations will be added as design stage.

Austerity is a term more associated with the policies of the previous government. Suggest using 'constrained public finances' instead.

Officer Comment: This has been actioned.

I'm not sure what this paragraph [Governance] is trying to say? It currently reads as/implies a criticism of the council's governance arrangements. Its also not clear what you mean by "citywide approval", as the strategy will be a statement of the Council's agreed approach to the urban forest, but won't necessarily be adopted by other landowners in the city. I would suggest redrafting this paragraph as a more positive statement that the strategy is intended to set out a cohesive, holistic citywide approach to the urban forest in Cambridge and it aims to mitigate the risks of isolated, fragmented management of the urban forest.

Officer Comment: No criticism was intended. Paragraph has been amended in line with the above.

I think its OK to highlight that urban development and densification can impact on the urban forest, but this sentence [Densification] reads as a criticism of planning policy and decisions, which are within the Council's gift. It would helpful to add a sentence here to explain the Council's planning policy? Local Plan policies on trees and the urban forest.

Officer Comment: No criticism was intended. Paragraph has been amended.

This [Transport Infrastructure and Road Redesign] could read as a criticism of GCP (which the Council is a partner in) or County Council decisions. Could this sentence be replaced with a positive

statement that the Council works with partners and stakeholders to highlight and mitigate these challenges and risks.

Officer Comment: No criticism was intended. Last sentence has been deleted.

Reframe [Conflicting Priorities] around competing land use for housing, business, leisure etc constraining space available for a resilient urban forest.

Officer Comment: Paragraph has been reworded as suggested. Also suggestions made to Resources, Fragmented responsibilities, Evidence and Data, Policy support have been accepted.

[Aim 1] Can you use the data available to indicate what the baseline is and what a 20% increase in coverage or number of trees would be? It would also be helpful to explain how we have arrived at 20% target? Is this realistic, achievable or ambitious/stretching? 2050 is a long way away – should we set an earlier target? The strategy runs to 2031 but the Council will cease to exist in 2028, so should we set an aspirational target for 2031, with an interim target for 2028?

Officer Comment: Information from Topic Papers 10 and 12 have been added to core document.

[Aim 8] It would be helpful to explain what you mean by “build internal capacity” here. Unless there are budget bids submitted for additional staff, it’s unlikely that the Council will have additional staff to help implement the strategy.

Officer Comment: This section has been reworded in line with the above.

The sections on Delivery, Policy and Actions all essentially set out what the Council will do to implement the aims/objectives of the strategy over the next five years. Together they cover 30 pages and there is quite a bit of repetition in the issues that they cover. I would suggest combining these sections and heavily editing the content into a more succinct statement of the actions that we are planning to take to improve and expand the urban forest.

Officer Comment: This has been achieved, as indicated previously, by removing information already set out in topic papers, and using graphics.

Can this be reframed? GCSP is the Council’s planning service, so to an external audience this statement reads like we are working with ourselves.

Officer Comment: As part of the previous comment this section has been removed.

END