Dear SCC,

On behalf of the Co-Chairs of STAG I attach our response to the SCC Draft Local Plan. Thank you for the opportunity to contribute and we hope you will find our comments and suggestions positive and helpful

Yours Faithfully
Chris Rust
Treasurer, The Sheffield Tree Action Group (STAG)
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Chris Rust

The Sheffield Tree Action Group (STAG)

Response to SCC Draft Local Plan

This response to the Draft Local Plan for Sheffield is sent on behalf of the 213 members of Sheffield Tree Action Group. You will see that we have suggested some additions to strengthen the plan with respect to the benefits to health, wellbeing and biodiversity provided by urban trees and greenspace. We have also included suggestions that SCC should consider adopting the concept of an 'urban forest' as a progressive systemic approach with benefits for many areas of policy.

Design of Streets, Roads and Parking (paragraph 9.13)

We are pleased to see the importance of street trees being emphasised here, and the referencing to policy GS7.

Policy GS7 Trees, woodlands and hedgerows

We are pleased to see the value of street trees acknowledged in this policy, and feel that it needs strengthening to ensure that street trees are protected and street tree canopy is increased, particularly in areas where this is currently lacking. Street trees are an amenity which is accessible to everyone, regardless of where they live and work. Among many scientific studies demonstrating the health effects of trees in the immediate areas where people live and work, Kardan & Gozdyra (2015) found that very significant health and wellbeing benefits were demonstrated when there were 10 trees to a city block: equivalent to 1 tree every 28 metres: Sheffield should aspire to maintain that ratio or better where it currently exists, address action plans to areas where it does not and introduce it in new developments.

Reference: Kardan, Gozdyra et al (2015) Neighborhood Greenspace and Health in a Large Urban Center, Nature Scientific Reports 5, Article number: 11610 (July 2015). [Available online at http://www.nature.com/articles/srep11610]

We propose some additional wording to various sections as follows:

Policy statement	Current wording	Suggested wording	Rationale for suggested amendments
BG1	All blue and green infrastructure in the city will be protected, managed and enhanced, wherever possible, to help increase biodiversity, provide wider environmental benefits to combat climate change, deliver opportunities for outdoor recreation and strengthen the city's landscape character.	All blue and green infrastructure in the city will be protected, managed and enhanced **as a significant element of Sheffield's urban forest**, wherever possible, to help increase biodiversity, provide wider environmental benefits to combat climate change, deliver opportunities for outdoor recreation and strengthen the city's landscape character.	Progressive cities are adopting the concept of an urban forest as a significant contributor to health and wellbeing as well as biodiversity. If green space is pervasive and connected it has far more impact than isolated pockets of green.
D1	Development should be sustainable, beautiful, functional, of high-quality, and should respect, take advantage of, and enhance the characteristic features of the city, its settlements, districts, and neighbourhoods, including: b) The distinctive landscape of river valleys, dramatic hillsides, extensive tree cover and views out to Sheffield's Peak District setting.	b) The distinctive landscape of river valleys, dramatic hillsides, **community green spaces,** extensive tree cover and views out to Sheffield's Peak District setting, **working towards a connected urban forest across the city.**	If citizens are able to live and move around the city in a natural environment the benefits to health and wellbeing will be very great. In addition connected green corridors are the best way to ensure diversity and widespread presence of wildlife. To make this a reality SCC should develop its own planning expertise in the practical methods that developers might be expected to adopt, for example green roofs.

Policy statement	Current wording	Suggested wording	Rationale for suggested amendments
IN1	Infrastructure priorities will include: (At present the list provided makes no mention of the city's natural environment as part of its infrastructure)	Infrastructure priorities will include: • **Adding to, joining up and developing connected and continuous green spaces throughout industrial, commercial and residential areas for public health and wellbeing, wildlife and biodiversity and the attractiveness of the city for investors, employers, workers and visitors.**	As we indicated elsewhere this could be considered an 'urban forest' policy to create a genuinely green and healthy environment for all citizens, not just those lucky enough to live in the leafy suburbs. This important given the growing focus on active travel for health, improving transport and accessibility and conserving the environment. Willingness to walk or cycle is greatly influenced by the environment along their routes
GS7 a	Developments should retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed on a basis greater than one for one using trees that are a minimum size of extra heavy standard	Developments **must** retain and integrate healthy, mature trees and hedgerows. **Any trees that need to be removed must have a CAVAT valuation (Capital Asset Value for Amenity Trees) and be replaced with sufficient trees to provide the same or greater CAVAT valuation within ten years.** Newly planted trees must be a minimum size of extra heavy standard.	To ensure sufficient value is assigned to the amenity and ecological value of mature trees, regardless of the location. To account for the high failure rate of newly planted trees in urban environments (approximately 30% in the first year, and up to 7% per annum in subsequent years)

Policy statement	Current wording	Suggested wording	Rationale for suggested amendments
GS7 b	Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees, or ancient or species rich hedgerows, other than in wholly exceptional circumstances and where a suitable compensation strategy exists	Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees **including street trees**, or ancient or species rich hedgerows, other than in wholly exceptional circumstances and where a suitable compensation strategy exists.	To ensure it is explicit that street trees are included in this policy.
GS7 c	Where existing trees are within or immediately adjacent to a development site, development proposals should give priority to retaining good quality trees and ensure that trees are adequately protected during the demolition and/or construction phases of the development	Where existing trees are within or immediately adjacent to a development site, development proposals **must** give priority to retaining good quality trees and ensure that trees are adequately protected during the demolition and/or construction phases of the development	To strengthen the policy and ensure mature trees are properly protected.
GS7 d	Tree planting should take place on site but, where it can be demonstrated that this is not possible, a contribution towards off-site provision will be permitted	Tree planting should take place on site but, where it can be demonstrated **that the required tree planting cannot wholly be carried out on site,** a contribution towards off-site provision will be permitted **such that any tree loss is adequately compensated for including a fully resourced 30 year management plan in line with BNG requirements**	To require as much tree planting as possible to take place on site.

Policy statement	Current wording	Suggested wording	Rationale for suggested amendments
GS7 e	New trees should be planted at a ratio of at least 1 tree per dwelling, of which a minimum of 10% should be street trees on all residential developments of 10 or more homes (where new streets are provided) and 1 tree per 100sqm of internal floorspace for non-residential development	New trees **must** be planted at a ratio of at least 1 tree per dwelling**, or 1 tree per 25 metres of linear road length, whichever is the greater.** of which a minimum of 10% **must** be street trees on all residential developments of 10 or more homes (where new streets are provided) and 1 tree per 100sqm of internal floorspace for non-residential development	To ensure street trees are planted at sufficient ratio to ensure significant health wellbeing benefits
GS f	Locally native species of local origin should be used and, where appropriate reflect similar habitat(s) of ecological importance and not conflict with other important habitats, natural features or archaeological remains	Locally native species of local origin should be used and, where appropriate reflect similar habitat(s) of ecological importance and not conflict with other important habitats, natural features or archaeological remains. **Species should also be chosen which are tolerant of the anticipated effects of climate change and, in street environments, tolerant of the challenging growth conditions. The Sheffield Street Tree Strategy must be consulted for guidance in choosing street trees.**	To ensure consideration of the changing climate situation, and ensure that the Sheffield Street Tree Strategy is used as intended.

Policy statement	Current wording	Suggested wording	Rationale for suggested amendments
GS7 g	Street trees and other green infrastructure should be located so that they are integrated into the street scene avoiding potential conflict with other features or activities	Street trees and other green infrastructure should be located so that they are integrated into the street scene avoiding potential conflict with other features or activities. **This may include constructing build-outs for tree planting, or ensuring pavements are sufficiently wide to ensure trees can be accommodated with sufficient area for trunk growth without impeding access for people using the pavement.**	To encourage more creative ways of incorporating street trees into new developments rather than merely taking space from pedestrians.
GS7 h	Existing street trees should not be removed or pruned excessively to facilitate development	Existing street trees **must** not be removed or pruned excessively to facilitate development	To strengthen the protections for street trees.
GS7 i	Appropriate provision should be made for ongoing management of any trees, woodland and hedgerows that have been planted and appropriate measures should be put in place to minimise the risk of trees failing	Appropriate provision **must** be made for ongoing management of any trees, woodland and hedgerows that have been planted and appropriate measures should be put in place to minimise the risk of trees failing. **This includes adequate watering schedules for trees in urban environments, replacing trees that have failed within 5 years of planting, and removal of tree guards once they cease to be necessary (including in new woodland planting).**	To account for the high failure rate of newly planted trees in urban environments (approximately 30% in the first year, and up to 7% per annum in subsequent years), and to ensure tree care schedules are put in place to minimise the rate of failure.

Policy DE3 Public realm and landscape design

We are pleased to see that policy statement **DE3 d** includes mature trees in the list of existing features which should be incorporated into new public realm designs. This policy needs to cross-reference policy statement **GS7 a** to ensure that public realm redevelopments achieve an equivalent amenity value of trees **at the time of development & tree planting**.

On Behalf of The Sheffield Tree Action Group (STAG)

Jon Johnson & Rich Ward

Co-Chairs

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