
Forest of Fingal – A Tree Strategy for Fingal 2020 draft

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Overall

This is a very good and ambitious document. Overall, this is a great piece of work, it is well-rounded, well-evidenced and well presented. Fingal County Council (“FCC”) should ensure the full integration of the strategy into all aspects of planning for maximum impact and benefit.

Part 1

- **Overall:** Excellent review of context and good to see evidence-based decision making.
- **1.1 70,000 publicly owned trees in Fingal** – what is breakdown between street trees, etc.? Street trees in towns and urban areas area of particular value and there should be specific targets for street trees.
- **1.15 Right tree right place:** FCC needs to direct developer interventions more closely to ensure right tree right place. Seaside locations should be considered due to the extreme exposures.
- **1.38 “Council will plant trees within the resources available”:** It is important that FCC publish specific targets and commitments to ensure the maintenance of trees where possible. Can budgets be allocated to each town in Fingal? Can budgets be integrated into and inform town tree action plans?
- **1.39 “Fingal will continue to manage the population of ageing trees through regular assessment to determine which trees need to be maintained or removed”** Where possible, dead or aging trees should be retained in parklands and in the countryside to promote biodiversity. This practice is widely adopted in Denmark.

Part 2

- **Overall:** Useful overview of the importance of trees drawing on current trends, references and data.
- **2.9 Size matters:** Can FCC plant bigger trees to shorten the time it takes for them to be beneficial?

Part 3

- A review of the number and location of ancient trees should be included in this section.
- **3.2. “At present Fingal has 1,506km of road suggesting space for a maximum of 75,328 street trees.”** That's 50 trees per km of road or 2 trees every 40 meters if trees are planted on both sides of the road. This suggested maximum does not appear correct and is not

ambitious enough. For comparison, Berlin has an average of 80 trees per km of road and the administrative district of Charlottenburg-Wilmersdorf, which is a central urban district, has 104 trees per km of road (source https://www.berlin.de/senuvk/umwelt/stadtgruen/stadtbaeume/de/daten_fakten/downloads/ausw_137.pdf). Clip from Berlin administration website (right-hand column shows trees per km of road/street).

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Straßenbäume in Berlin

Anzahl je Kilometer Stadtstraße (Bestandsdichte) in den Berliner Bezirken

Bezirk	Bestand	Straßenlänge km	Bäume je Kilometer Straße
	Anzahl		Anzahl
Mitte	26.140	342	76
Friedrichshain-Kreuzberg	16.084	178	90
Pankow	42.627	602	71
Charlottenburg-Wilmersdorf	42.481	409	104
Spandau	25.075	449	56
Steglitz-Zehlendorf	60.640	631	96
Tempelhof-Schöneberg	34.895	400	87
Neukölln	20.798	344	60
Treptow-Köpenick	44.075	687	64
Marzahn-Hellersdorf	42.882	542	79
Lichtenberg	31.351	345	91
Reinickendorf	44.053	475	93
Berlin gesamt	431.101	5.403	80

- **3.2 “the more northerly towns in the county, i.e., Lusk, Rush, Donabate, Balbriggan and Skerries, could be said to be in particular need of additional tree planting.”** This is a very important point. There is an under provision of trees in town centres here and these towns require a place-specific action plan that links through to the development plan. This should cover not only trees in parks and in the hinterlands etc. but importantly street trees! Choice of species is also very important, especially in seaside towns.
- **3.4 “Residents may still ring or e-mail with concerns...”** It is important to involve residents before taking action! Residents have a right to know what the plans are for maintenance, removal, replanting etc.

Part 4

- **Overall.** The tree strategy needs to be more integrated with other areas over which the council has control, e.g., moving overhead wires underground, underground utility pipes/cables etc., use of alternative/innovative pavement surfaces, traffic calming measures, widening of footpaths, building cycling infrastructure, replacing on-street parking with space for trees etc.
- **4.4 Tree cover aims.** What % of tree cover is Fingal aiming for? This should be reiterated here. Targets are lacking throughout the strategy. The aim should be 15% in 10 years of the policy with hard goals. This is necessary as Fingal is the lowest proportion currently of any of the Dublin councils.

- **Policy 5. *The emphasis on quality*** – can the policy encourage a certain amount of tree planting? It is clear from page 39 that quality will be valued over quantity – but will this statement be taken advantage of by developers? Does the way that it is written conflict with the 20% of green areas stipulated later in the strategy?
- **Policy 6. *Tree Replacement***. I welcome the aspiration to replace trees in accordance with the size of any removed tree.
- **Policy 6. *Tree Replacement***. Developers need to replace both the quantity and quality of any trees removed.
- **4.5 Policy 7**. The text should cross-reference to the section on utilities on page 54). ESB are responsible for the butchering of many of the county’s trees. Can the tree strategy safeguard trees against this treatment? There should be better integration of services and trees and undergrounding of services at the implementation stage. Trees should take precedence over obstructions. It sounds as if FCC/trees are at the mercy of utilities, which should not be the case. Proper integrated planning should be able to prevent destruction of trees except in cases of emergency.
- **Policy 8 - *Removal of trees***: This is a good policy, but it is important that trees are planted where they will make a positive impact. It is not acceptable to remove street trees and re-plant in a public open space instead – resulting in a poorer quality streetscape.
- **4.5 *Removal of Trees. Trees can be removed, “to allow space for new planting”***. The tree strategy should prioritise the retention of mature trees.
- **4.5 *Removal of trees - Policy 9***: Tree removal plans should be published and consulted on locally with residents and where appropriate, the wider community. Will records (documentation of reasons for work) be accessible by the public?
- **4.5 *Tree stumps***. There should be some maximum timeline for the removal of stumps. Leaving tree stumps in towns is not acceptable and roots should be dug out if necessary. Waiting for up to 3-5 years for re-planting is not acceptable in towns.
- **4.8 *Maintaining and Increasing Tree Canopy Cover***. Good to see that 20% green areas are required in new developments. Please clarify how the measurement of street trees is calculated (tree pit size, spread at planting – spread at maturity?).
- **4.8 *New Tree Planting within Developments***. Council needs to be aggressive in getting value for money when giving out tenders, figures in circulation for the cost of tree pits seem excessive and we would be concerned that this could become a deterrent to street planting when it needs not to be.
- **4.9 *Trees and Utilities: “...the Council will encourage utility operators...”, “The council will develop protocols...”*** – When will a timeline be developed? This section sounds weak and needs firm guidelines developed for utility companies to work to which includes consultation. Utility companies should only be permitted to remove trees following an assessment process has been undertaken.

Part 5

- **5.14 A sense of ownership.** It is great to see the intention to closely liaise with public community groups, stakeholders and residents. There are people to be found in every town to be empowered. There should be an information/education strategy included in the Fingal Tree Strategy.
- **5.24 Community Involvement, Public Engagement & Awareness Building:** Again, it is great to see the excellent objectives of this plan and engagement with communities and NGO's. It is really positive to have a clear policy and clear objectives and value placed on trees and their importance to society and wellbeing. The encouragement of control on private lands is important and so often trees are felled with minimal reasoning.
- **5.3 The Action Plan** – The Action Plan contains some fundamental steps and excellent practice which is very welcome indeed. Examples include the utilisation of tree valuation methods, the recruiting of experts, the investment in up-to-date software for mapping and recording trees, the plan to establish a good understanding of ecosystem services and nature-based solutions in Fingal.
- **5.3 The Action Plan. 1.1** The presence of a secured and adequate budget is fundamental.
- **5.3 The Action Plan 4.3** When will these protocols be developed? Will there be consultation with the public, especially interest groups, on the protocols? Each resident has a right to know reasons of removal and have reasonable notice and a right of appeal on the matter.

