

Appendix 3b - Table 3: Individual Comments, Responses & Changes Proposed

From: name	Part of Strategy	Comment/ proposed change	Response	Changes made
	N/A	Offered to help fund trees and take part in tree planting. Asked if there were any public meetings	Thanked him by phone & made note.	Option for sponsorship scheme for tree planting added to Action Plan as part of Action 4.4
	N/A	Referred to incompatibility of T&W Strategy & proposals for extension to car park at Bantock Park	Replied & advised two separate process but Bantock Park proposals have been dropped.	None
Whitmore Reans Connect	N/A	It's great to see the council is developing a Tree and Woodland strategy and that it's promoting tree planting as a way of combating climate change. New trees should be planted wherever possible and existing trees should have more protection.	Replied & advised this was the aim and stronger measures are under consideration	None to Action Plan; stronger measures on planting & protection will be considered as part of the Actions in the Action Plan
		We were involved last year in a tree planting project with Claire Darke and found it very difficult to obtain permission to plant whips in the city. I note that you intend to encourage community groups, such as ours, to plant trees in future. I do hope that this will mean that we will be able to plant more trees in areas of deprivation such as Whitmore Reans.	Noted. Replied & advised that the Objectives include working in areas of deprivation.	None
		I look forward to the new strategy and hope to become involved in new tree planting schemes this winter. Please do keep me informed,	Noted.	None

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Part of Strategy	West Midlands Friends of the Earth	WMFOE welcomes this consultation and would encourage the City to encourage the three other Black Country boroughs to produce something similar and possibly for there to be a Tree and Woodland policy within the emerging Black Country plan.	Noted. Outside scope of Strategy, although discussions are taking place about further work at a Black Country level.	None
	WMFOE welcomes the Tree and Woodland Strategy Objectives.	Noted	None	
	WMFOE would like to draw your attention to the response from the Birmingham and Black Country Wildlife Trust which covers many of the issues in great detail.	Noted	See B&BCWT comments & response	
	WMFOE would like to see a commitment for Wolverhampton to at least double Tree cover by 2038. This would ally the tree strategy with the emerging local plan for the Black Country.	We are looking to work with Black Country LEP and other Black Country Councils to provide evidence-based targets using a doubling of tree cover as a benchmark	Objectives and Action Plan amended to include aim of increasing tree cover in line with targets to be established following further work	
	WMFOE would like to see a positive commitment to maintain and preserve the trees that are already in place across the City.	Covered by Objectives	None	
	There needs to be a diverse mix of trees across the City.	Covered by Objectives	None	
	If for one reason or another a tree has to be felled or removed there should be a commitment to replace that tree as close to the location from where it is to be removed as possible and at least one additional tree be planted in close proximity. This is to recognise that a sapling does not have the same air conditioning, climate enhancing properties or support	Objectives include aim of trees, replacing those lost and supplementing them with additional planting. Further details including an aim for two-for-one or greater replacement are proposed for more detailed consideration as part of the document/ guidance reviews in the Action Plan.	Clarified in revised objectives	

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Part of Strategy	the same number of species as a mature tree.		
	The reasoning for any tree removal should be explicit and be based on the health of that tree. This should be well recorded and be part of the overall tree management strategy. This should be on open record so as trees are not removed without trace or for the incorrect reasoning.	Trees are removed based on health or for development schemes. It is not considered practical to keep a record of all trees removed, given that the council manages in excess of 400,000 trees. Where highway trees are proposed for removal in sensitive locations, public consultation is carried out. Trees are not removed without a valid reason as the Council recognises the value of the stock.	None
	WMFOE would wish to see Wolverhampton City council have a positive vision for the urban realm in which street trees play a significant role and there are policies to ensure that street trees not only thrive but increase in number very quickly.	These can be clarified in the document and will be covered in the proposed action plan. Review of guidance in Action Plan to include street trees.	Reference to public realm added to a revised Vision & Objectives. Objectives revised to make clear aim of increasing street trees. Tree planting programme included in Action Plan.
	WMFOE would wish to see policies that value trees in the public realm as having many benefits including providing shade during periods of intense heat, being natural air conditioners, improving the urban realm, providing vital habitats and wildlife corridors and much more.	This is recognised in the Strategy and their importance are enhanced through the Climate Emergency declaration.	None

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Wildlife Trust for Birmingham & Black Country	Vision	<p>The local planning department should make sure that the planting of a diverse range of broadleaf trees is integral when planning permissions are granted. The issue of tree planting should be part of any preliminary discussion with developers. Once produced in its final format this Strategy should be celebrated, shared and promoted to residents, local business and visitors alike so as there is significant buy in to this encouraging initiative.</p> <p>WMFOE would hope that the Tree and Woodland strategy is supported by the Black Country LEP as well as the WMCA. Referred to proposed tree removal at Bantock Park & 'sham' Tree & Woodland Strategy consultation. Quoted Joni Mitchell (Big Yellow Taxi, 1970): 'They paved paradise And put up a parking lot They took all the trees Put 'em in a tree museum...'</p>	<p>This is recognised in objectives and will be addressed in review of guidance for trees in new development in Action Plan</p> <p>Addressed in Engagement & Promotion Section of the Action Plan</p> <p>Support being received from Black Country LEP. Wider activity of LEP & WMCA linked into Action Plan</p> <p>None. Anonymous and only specifically referred to Bantock Park proposals.</p>	<p>None</p> <p>Action Plan to have enhanced reference to promotion, linked to Climate Emergency</p> <p>None</p> <p>None</p>
		<p>The Wildlife Trust support the vision, its aim for trees and woodland to be at the heart of Wolverhampton's green infrastructure, and the acknowledgment of their contribution to the provision of a range of ecosystem services. We would, however, recommend that a strong and standalone point on biodiversity be made rather than this being combined with amenity.</p>	<p>Points noted and accepted.</p>	<p>Separate, strengthened points on biodiversity and amenity included in Vision.</p>

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		<p>We would also recommend that the vision includes a clear commitment to increase the tree stock within Wolverhampton. Adding a commitment to the vision statement will support Wolverhampton Council to mitigate climate change, in line with its commitment to ‘make the authority zero carbon by 2028’.</p>	Point noted and accepted.	<p>Vision amended to include reference to increasing tree stock and to Climate Emergency declaration</p>
		<p>In addition, we would seek that the Tree and Woodland strategy make reference to the Birmingham & Black Country Nature Improvement Area (NIA) ecological network mapping 2017 -2022 and the emerging Nature Recovery Network map which enables targeting of tree planting and management for the benefit of ecological connectivity and biodiversity. Maps can be provided by the Trust which could be used in conjunction with the Woodland in Wolverhampton plan on page 5, produced by EcoRecord. The NIA strategy map depicts the ecological network of Birmingham and the Black Country identifying core, linking and ecological opportunity areas within Wolverhampton, and is being used as the basis for the creation of a Nature Recovery Network map.</p>	Point noted and accepted. Further information obtained from Wildlife Trust	<p>Reference added in new paragraph in The Importance of Trees and Woodlands to Wolverhampton section of Strategy. Map added to Strategy (Figures 2).</p>
	<p>Importance of Trees & Woodland to Wolverhampton</p>	<p>2.1: The reference to designated sites is unclear as to what national and local designation this refers to. Both SINCS and SLINCS are a local designation jointly referred to by the nationally recognised</p>	Point noted and accepted. Incorrect reference in text.	Text corrected.

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Part of Strategy	term Local Wildlife Sites, and reference to this and national designations could be clearer.		
	2.3: Ashen Coppice South is not a name that EcoRecord (The Environmental Records Centre for Birmingham and the Black Country) recognises for this site. The woodland adjacent to Park Coppice is recorded as Park Coppice Dingle.	Point checked with Wildlife Trust	Reference amended in Strategy
	2.4: It could be noted that The Wildlife Trust have enhanced a number of these plantations through thinning, underplanting and field-layer introductions through the Nature Improvement Area initiative.	Point noted and accepted.	Text added to include reference suggested.
	2.7: The loss of trees at Bilston Urban Village is potentially higher than the number being planted and therefore the Wildlife Trust do not consider this a good example of tree planting in a new development.	Point noted and accepted.	Reference deleted.
The Benefits of Trees	3.3: It should be noted that some tree species 'are important sources of biogenic volatile organic compounds (BVOCs), notably isoprene. BVOCs can enhance the formation of pollutants including PM and ozone. However, BVOC emissions could be avoided by selecting low emitting species'. Impacts of Vegetation on Urban Air Pollution, Air Quality Expert Group (2018).	Point noted and accepted.	Reference added to paragraph 3.3

From: name	Comment/ proposed change	Response	Changes made
Part of Strategy	Selecting the 'right' species should therefore be mentioned.		
	The Air Pollution Abatement Performances of Green Infrastructure in Open Road and Built-up Street Canyon Environments – A Review (2017) concluded that in many urban situations hedgerows are more effective at improving air quality than street trees. Reference to the benefits of this type of green infrastructure may therefore promote their use in appropriate situations (school boundaries, for example).	Point noted and accepted. Value of hedges recognised elsewhere in revised Strategy.	Reference added to paragraph 3.3. Other references to hedgerows elsewhere in Strategy.
	3.6: Reference could be made here to the difference in the numbers of species associated with different tree species, and that native tree species in the main provide feeding and nesting opportunities for a significantly higher number of species than non-native trees. Countrysideinfo.co.uk have compiled a table of numbers of insects and lichens associated with native tree species.	Point noted and accepted. Listing of individual tree species too detailed but reference included.	Reference added to paragraph 3.3.
	3.7: Birmingham and the Black Country is a single designated Nature Improvement Area and therefore the reference to this should be singular. Reference could also be made here to the emerging Nature Recovery Network commitment in the UK Government's 25-Year Environment Plan.	Points noted and accepted.	Reference to Nature Improvement Area amended and to 25 Year Environment Plan added here and elsewhere.

From: name	Comment/ proposed change	Response	Changes made
Part of Strategy	4.3: As 2.4 it could be noted that The Wildlife Trust have enhanced a number of woodlands on Council land through thinning, underplanting and field-layer introductions through the Nature Improvement Area initiative.	Points noted and accepted.	Reference added.
Management on Council Land	6.3: States that the 'NPPF also advises that planning policies and decisions should contribute to and enhance the natural and local environment (paragraph 170) by protecting values landscapes and sites of biodiversity and recognising the economic and other benefits of trees and woodland'. This statement can be further strengthened with reference to paragraph 174 which states 'that planning applications should identify and pursue opportunities for securing measurable net gains for biodiversity'.	Noted. This Strategy is, however, about trees and woodland rather than broader biodiversity.	None
Trees in new development	In addition, the Environment Bill Summer Policy statement: July 2019 states that the future Environment Bill 'will require developers to ensure habitats for wildlife are enhanced, with a 10% increase in habitat value for wildlife compared with the pre-development baseline'. This will increase opportunities for Wolverhampton Council to providing further tree and woodland planting across the area and ensure that new developments support the Tree and Woodland Strategy by the provision of further planting on new	Point noted and accepted. Linked to commitment on environmental net gain in 25 Year Environment Plan	Reference added in new paragraph 6.1

From: name	Comment/ proposed change	Response	Changes made
Part of Strategy	developments, in accordance with national legislation.		
City of W Council developments	7.5: As 2.7, the Bilston Urban Village development has resulted in significant losses of woodland and trees which are not compensated for through new planting.	Point noted and accepted.	Paragraph deleted.
Objectives	An objective should be included which states the that the strategy will contribute to the Nature Improvement Area ecological strategy and the delivery of the emerging Nature Recovery Network plan.	Principle accepted but this is very specific and no Nature Recovery Network currently under development. Propose added objective about supporting broader initiative listing NIA as an example.	Added objective about supporting initiatives, listing some under way including Nature Improvement Area.
Action Plan	We would seek for the production and review of guidance documentation, such as guidance note for trees in new developments and provision for trees in public realm design guide and connected places strategy, to include consultation with relevant organisations and public bodies.	Point noted and accepted. Some documents listed would automatically require consultation, for example where replace Supplementary Planning Documents. References added where consultation required.	Reference added re guidance note on trees & hedges in new development
	We would seek further reference to the selection of native trees where possible, for example in 1.20.	Point noted & accepted	Reference to native species added in 1.20 & elsewhere
	A policy should be included for the biodiversity enhancement of existing woodland through management and,	Point noted. Can be included in existing action with simplified wording	Reference to biodiversity & management as well as

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		where appropriate, the planting of new trees and field-layer species.		planting included in revised Action 4.3
	Additional Points	<p>In July 2019, Wolverhampton Council declared a climate emergency and announced plans to make the city greener by 2028. This includes a commitment to reducing carbon emissions by pledging to reduce CO₂ levels to 0 by 2028. The Wildlife Trust see the Tree and Woodland Strategy 2019 – 2029 playing a significant role in achieving this commitment and recommend that this be included with details provided on how the strategy would work in conjunction with other policies in reaching this commitment.</p>	Reference included. Detailed Action Plan for Climate Emergency under development	Reference to Climate Emergency declaration & role of Tree & Woodland Strategy in delivering mitigation & adaption included in Strategy & Action Plan.
		<p>In addition to promoting the selection of native species for planting, the Wildlife Trust recommend planting a range of species which flower and fruit at different times of the year, therefore providing pollen/nectar and fruit throughout the season (approximately March-October). This should be planned and undertaken on an individual site/street or local level as well as city-wide.</p>	Point noted. Added to paragraph 3.6	Reference added to paragraph 3.6.
Natural England		<p>NE would first like to address comments made to this consultation by the Wildlife Trust for Birmingham and the Black Country dated 15 September 2019. Please take this letter as confirmation that Natural England</p>	Noted	See B&BCWT comments & response

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Part of Strategy	wholly supports the comments made by the Trust in relation to this document ...		
1. Vision	<p>We support the clear purpose of the document as provided in Section 1 as well as the recognition, at the outset, of the aging stock of trees and climate change challenges to which we all must take action. This text here also makes it clear that the overall purpose of the strategy is to provide options for ‘change’ – ‘to make Wolverhampton a greener, healthier and more prosperous City’. NE supports this vision.</p>	Noted	None
12. Objectives/ 14. Action Plan	<p>It is clear that much of the document is focused upon the presentation of the existing situation (or baseline) evidence around trees and woodland in the City. Notably, it is evident that Sections 12 (Objectives) and 14 (Action plan) provide the key deliverables in terms of ‘strategy’. NE is unclear as regards how the actions provided in the Action Plan have been developed as part of an improved approach (i.e. this Strategy) to trees and woodland or where this is simply capturing what has always been done. i.e. is there a way of demonstrating how the Strategy is actively seeking to deliver over and above what actions were already being carried out?</p>	<p>The Strategy presents the existing situation, the Vision and Objectives the proposed approach & the Action Plan the delivery of the Vision & Objectives. The Action Plan contains predominantly new or strengthened actions, including some additional or clearer ones than contained in the Consultation Draft</p>	<p>Some additional or clarified Actions included to make clearer the link between Vision/ Objectives & Action Plan</p>

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Part of Strategy	NE considers it worth mentioning here that the government has an urban tree planting target of 1 million by 2022, as referenced in the 25 year environment plan. The Urban Tree Challenge Fund is a delivery mechanism for this and exploration of this as an optional funding stream should be referenced in the Action Plan.	Noted	Reference to 1 million tree target added to Foreword (formerly Introduction). Reference to Urban Tree Challenge Fund added in Action 3.2 in revised Action Plan.
Vision/ Action Plan	NE supports the Vision as provided but would recommend reference here to the value of trees for ecosystems services provision, particularly in tightly knit urban areas where other green infrastructure interventions can prove impossible to retrofit.	Ecosystems are mentioned in 3.6 & 3.7 but the term is considered too technical for the Vision; some changes made however to Vision	Enhanced reference to biodiversity in Vision including specific point on the subject & reference to green infrastructure
Vision	Notably, Natural England is aware that the Black Country Consortium and Local Enterprise Partnership are currently exploring with the Black Country Plan Leads the concept of a comprehensive urban tree programme, underpinned by ecosystems services evidence and itree analysis covering the entirety of the Black Country. This, to further inform as regards new tree planting programme for the area. Whilst this would negate the need for an individual City approach in this Strategy, it does not negate the need for the importance of new tree planting / woodland creation to also be clearly provided in the Vision, Objectives and Action Plan of this Strategy. Therefore, in line with the governments aspirations the	Noted. Current exploratory work is too uncertain and current for specific mention but point taken about enhanced references to planting & maintenance programmes. Replacement covered by reference to well-managed stock in Vision & management in Objectives.	Enhanced reference to partnership working, delivery of wider initiatives, tree planting & increasing tree/ woodland cover & maintenance included in Vision, Objectives & Action Plan (e.g. 1.2, 1.3, 3.1, 3.2, 4.3)

From: name	Comment/ proposed change	Response	Changes made
Part of Strategy	<p>Vision should highlight the need for improved tree / woodland provision / creation as well as the need for improved maintenance and timely replacement programme.</p>		
	<p>Natural England welcomes this section which draws out the wider benefits of trees in terms of ecosystems services provision as well as economic.</p>	Noted	None
The Benefits of Trees	<p>It would be useful to have a further paragraph that draws all of this together explaining that for their ecosystems services value their protection, and further establishment, is paramount. Many of the services they can provide do depend upon placement, type and canopy cover. This is why it is crucial for our urban environments that we ensure a commitment to effective management, maintenance, succession / replacement and creation programmes that secure the health of our cities in to the future.</p>	Noted. It is considered this is best covered by enhanced reference in section on Biodiversity	Covered by enhanced section on Biodiversity.
	<p>Wolverhampton Council has declared a climate emergency (July 2019) and should be referenced here if not before.</p>	Noted & agreed.	Reference to Climate Emergency added in Foreword, Vision, Objectives & Action Plan.

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Trees in new development	<p>We would also draw your attention to the Black Country GI-DEBT (Green Infrastructure – Digital Evidence Based Tool) which provides ecosystems services ‘areas of deficit’ and ‘pinch points’ for the area helping to identify areas of priority intervention / creation of new planting for this purpose. This evidence, combined with the itree data currently being investigated by the Black County Consortium, is intended to positively assist in identify priority areas for new planting placement. Reiterate comments of Wildlife Trust response.</p>	<p>Noted, but not considered appropriate to reference this particular tool. Instead more general refence added to wider initiatives & working in partnership.</p> <p>Noted. See response to B&BCWT's comments.</p>	<p>Reference to working in partnership, including with Natural England, added in 8.2, to wider initiatives in Objectives, to surveying tree cover (2.1) & working in partnership (3.1) in Action Plan.</p> <p>See above.</p>