

To: City of Westminster

Subject: Trees and the Public Realm (Draft)
Draft Supplementary Planning Document
December 2009

Response from Westminster Tree Trust
Registered Charity Number 285191
www.westmtreetrust.org.uk

February 2010

Westminster Tree Trust (*hereinafter referred to as WTT*) appreciates being given the opportunity by the City of Westminster to comment upon 'Trees and the Public Realm' (Draft) (*hereinafter referred to as the consultation document*), as part of the consultation process.

Established more than 25 years ago, WTT is a registered charity run entirely by volunteers with strong local connections. It seeks to improve the built environment by the planting of trees, in particular street trees, for the benefit of those who either live or work in or visit Westminster. WTT works in close cooperation with Westminster City Council Tree Section, to augment the City Council's own street tree planting programmes.

WTT raises its funds from residents, residents' associations, businesses/other commercial organisations and grant making trusts. Recently WTT has been offered a community grant by Groundwork London – which works closely with the Mayor of London and the Forestry Commission - towards the planting of 50 trees in Weymouth Street, London W1.

There seems little point in going into the crucial importance of planting trees in cities, as this is covered extensively within the consultation document.

WTT has worked always on the fundamental principle that all tree planting must be appropriate to any particular location/area, and neither detract from existing amenity, townscape character, et cetera, nor have negative community safety implications. In essence, WTT aims to commission through Westminster City Council the right trees in the right places - i.e., where there is perceived to be a need, usually flagged up by local communities – and with the benefit of advice/expertise from the City Council Tree Section, WTT considers that this has been achieved consistently.

In recent years there has been considerably more demand for street trees from residents, residents' associations and businesses in Westminster, who are willing increasingly to match fund tree planting projects, sometimes in partnership with the City Council and WTT, and invariably supported by ward councillors.

With regard to the consultation document, WTT would like to comment as follows:

I) The Mayor of London has pledged to plant 10,000 street trees by 2012. It is the view of WTT that the City of Westminster should support enthusiastically this initiative, both by itself planting where appropriate as many street trees as possible and allowing accredited sponsors to do likewise, by commissioning trees through the City Council Tree Section.

II) The consultation document states that there are in Westminster '.....few remaining suitable opportunities for new planting.' (4. page 8).

WTT disagrees wholly with this – it is regularly being approached by local communities from many parts of Westminster, with suitable tree planting proposals.

III) The consultation document states the following:

- 'Part of that character (*i.e. of conversation areas*) may well be derived from the areas original masterplan intention, which in some areas means the provision of garden squares to complement the surrounding hard urban landscape. Trees planted on these streets (rather than within the squares) may therefore detract from the character of the conversation area. (26. page 15)
- '.....there is, for example, a strong presumption against planting trees on formal streets of Georgian and Victorian houses if they were never intended to have street trees. They were consistently omitted to give effect to the landscaped garden square.' (28. page 17)
- 'Tree planting should reflect the history, architecture and tradition of places, and is not appropriate in every Westminster Street. They can introduce a discordant note into streets where the character is derived from the repetition of architectural features, for example the regular symmetrical Georgian and Victorian terraces of the Portman Estate and Pimlico or where trees were never intended to be part of the street scene such as in the narrow 17th Century street patterns of Soho and Covent Garden. The integrity of these places can be easily and incrementally eroded by the introduction of alien features.' (41. page 22)

- 'Some areas of Westminster have received tree planting initiatives in the past that did not take account of their location. The formal squares and private gardens of areas such as Pimlico and Belgravia were conceived as green oases, within the surrounding streets that are flanked by buildings conceived as grand neo-classical 'palazzi' designed to be seen as one architectural composition. It is important to recognise that breaking these vistas with individual or avenues of trees harms this concept and erodes the special character of the place. Without the ability to appreciate these buildings, and therefore these periods of architectural development, London loses some of what makes it unique. As trees require maintenance or replacement, the appropriateness of some earlier planting will need to be reconsidered on a site by site basis.' (42. page 23)

Comments by WTT on the above extracts from the consultation document:

- a) The extracts are highly subjective.
- b) Many formal squares and private gardens can be accessed only by subscribers.
- c) No account is taken of the fact that there has been a great deal of change generally in the street scene since Georgian and Victorian times.

In so far as trees are concerned, prior to the Clean Air Act 1956, because of air pollution, the only species that could be used in central London was the London plane tree, a hybrid of the American and oriental plane trees, which is especially well adapted to urban conditions. London plane trees drop bark (and seed balls) – they are more resistant, therefore, both to air particulates and disease. London plane trees grow to considerable heights and are consequently unsuitable other than for squares and major spaces/thoroughfares (such as Whitehall). Hence, until air in London became cleaner, allowing more tree species to survive, very few could be planted in smaller streets. This may well explain why city centre street tree planting was so restricted in Georgian and Victorian times (i.e. mainly to garden squares), rather than for the reasons stated in the consultation document.

Today a number of 'tailor made' tree species are available, for example, chancicleer pear trees and upright maples, ideal in size, shape, impact, growing features, et cetera, for street planting, and which have been used very successfully throughout many parts of Westminster, even in the tightest of street patterns.

Changes to the streets of Westminster since Georgian and Victorian times include modern lighting, signage, street furniture, etc, and not least indeed the advent of motor vehicles, residents parking, bus stops, traffic lights/islands/bollards and kerb build outs (often with specific provision for trees), as well as the loss of much residential land use to commercial. Trees can help to mask these more recent, often less visually attractive features.

d) As so many of the original properties in those areas have been lost, converted, added to, commercialised, interspersed with new buildings, vistas destroyed, etc., the concept of "....grand neo-classical 'palazzi'...." certainly seems pretentious in the context of today, other than, possibly, as regards a few of the major building establishments which still remain in, for instance, some parts of the Grosvenor Estate.

IV) The consultation document states that

'Existing street trees that are inappropriate to their townscape context will not be succeeded, and consideration will be given to their removal.' (29. page 19)

WTT asks who might decide that trees are inappropriate to their townscape context and either not replace or even remove them? Shall councillors, as elected representatives, be involved in the decision making process and will the public be allowed to comment? What would happen if sponsors had financed the planting of such trees? Recently, four trees commissioned by WTT were removed from Argyll Street, W1 without any notification from the City Council.

V) The consultation document refers to

Areas where caution should be exercised in tree planting

(31. page 19)

Areas where moderation should be exercised in tree planting.

The terms 'caution' and 'moderation' in this context are both arbitrary and unspecific. Will the decision making process in such matters be democratic, in that members of the public could make representations to councillors who are empowered appropriately?

WTT considers such an approach to street tree planting as far too generalised, and out of touch with community aspirations in the 21st century. The above areas, as denoted on the tree planting designation map (page 18) are extremely extensive and, largely, of very diversified townscape, incorporating both traditional and modern properties, residential and commercial, ranging from Georgian houses to high rise buildings. It is the view of WTT that all tree planting proposals in Westminster should be considered on their own particular merits, and in every case the street 'walked' by at least one of those responsible for a decision, to be made, if contentious, in consultation with ward councillors, who will be able to gauge local community opinion.

West Marylebone is designated as an area where 'Caution' should be exercised, although the streetscape there is hard and largely treeless.

WTT agrees that some of the broader streets in West Marylebone have potential for greater flexibility.

However, with regard to West Marylebone, the consultation document states:

'The limited amount of planting concentrated in the north of Harley Street Conservation Area should not be extended throughout the rest of this conservation area.' (15. Appendix B – 29)

'The narrower domestic streets should not be obscured with planting.' (15. Appendix B – 30)

'The intricate and interesting architectural details used on Victorian development throughout the area should not be obscured by trees (15. Appendix B – 30)

WTT considers the above statements unduly restrictive to street tree planting in West Marylebone, where there are various suitable opportunities.

East Marylebone is designated also as an area where 'Caution' should be exercised. There are neither squares nor green open spaces in this area. It has few trees, and is of hard urban character.

Yet, with regard to East Marylebone, the consultation document states:

The predominantly narrow streets, detailing of the architecture and distinct sense of place should be respected, and its streets, generally, left unobscured by trees.' (16. Appendix B – 31)

'Avenues of new planting are not appropriate for the existing historic streets in this Townscape Area. However, it may be possible to successfully locate individual trees at spacious junctions.' (16. Appendix B- 32)

WTT does not agree that streets in East Marylebone should be left generally without trees. Again, it is the view of WTT that every street tree planting proposal in Westminster should be considered on its own particular merits. East Marylebone has much uninspiring architecture, over which in many cases suitable trees would provide a welcome cloak.

During 2009, a partnership between the W1W Tree Planting Initiative – residents, residents' associations and businesses - Westminster City Council and WTT completed the planting of 40 chancleer pear trees in Hallam Street, W1, which has brought balance and uniformity to a street of high buildings with very mixed architectural styles. There is potential for a similar project in Weymouth Street, W1, towards which, as stated previously, a community grant has been offered by Groundwork London.

As regards Weymouth Street, photographs taken in 2010, when compared with archive photographs *circa* 1905, show that very few buildings still remain today from those existing in 1905 (in fact, period buildings there in 1905 appear to be minimal anyway !). Obviously, major architectural changes took place to the Weymouth Street townscape before and during the 20th century. Also, the buildings of Weymouth Street vary considerably in age, style and height. The vista when looking east from Weymouth Street is dominated by the Post Office Tower.

In November 2009, tree planting in Marylebone was endorsed by the Secretary of State for the Environment, Food and Rural Affairs at a ceremonial tree planting in Great Portland Street – the launch of National Tree Week - also attended by the Director General of the Forestry Commission, a Trustee of The Tree Council, the Member of Parliament, city councillors, many well wishers from the local community as well as representatives of the W1W Tree Planting Initiative and WTT.

Marylebone offers huge potential for regeneration, towards which trees can play a major part.

The W1W Tree Planting Initiative has raised considerable funds from the local community – residents, residents' associations and businesses – and is supported by ward councillors.

Soho, designated similarly in the consultation document for 'Caution', has few trees, although approximately 50 were commissioned there by WTT in recent years, with cooperation from the Soho Society, sponsors including the Esmee Fairbairn Foundation and Shaftesbury Plc (freeholders of the Carnaby Estate).

The consultation document states:

'Trees have been planted along Broadwick, Marshall, Carnaby and Lexington Streets in recent times. These are four of the only such streets in the West End, but nevertheless, are not entirely appropriate and should not be seen as justifying further planting of this kind.' (18. Appendix B – 35)

WTT disagrees entirely that these 'tailor made' trees, carefully positioned, are not appropriate, and they have been extremely well received by the local community.

The consultation document states also with regard to Soho:

'Avenues of trees, including in front of refurbished or redeveloped buildings, is an inappropriate form of planting and there will be a presumption against it.' (18.2 Appendix B – 36)

Again, WTT regards this approach as unduly restrictive, and, as previously stated, is of the view that every street tree planting proposal in Westminster should be considered on its own particular merits.

CONCLUSION:

WTT recognises fully that Westminster tree planting must be sensitive to the townscape/architecture, etc., of any particular street/area. However, as stated above, several times, it considers that all tree planting proposals in Westminster should be looked at on their own particular merits, rather than any being rejected out of hand on the basis of general tree planting policy for a specific area. In other words, policy needs to be flexible, street by street.

Also, policy should be responsive to local community opinion.

WTT finds 'Trees and the Public Realm' (Draft) to be far too generalised and well behind the times.

There seems to be an assumption in the consultation document that the streetscape of Westminster should remain unchanged from what it was in previous centuries, and WTT regards this approach as highly questionable.

WTT sees no reason why the quality of townscape architecture in Westminster cannot be preserved in conjunction with suitable tree plantings in appropriate locations, even where original developments were designed without trees, for whatever reason(s).

As already stated, 'tailor made' trees, unavailable in Georgian and Victorian times, can now be used to complement the architecture of streetscapes.

WTT suggests that the City of Westminster should opt for policy which places less emphasis on historic tree planting concepts and moves on towards well configured schemes that would enhance the streetscape and help to soften the impact of some contemporary buildings and modern street furniture.

The Street Improvements Review Group (SIRG)

SIRG is a council officer body with no councillor representation, that carries out an important role in overseeing street improvements in Westminster, especially where historic buildings are concerned, and which works closely with English Heritage.

SIRG is extremely influential to street tree planting.

On occasions, community street tree planting projects appear to be held up for many months – waiting specifically for approval by SIRG. Some schemes, however popular locally, and often supported by ward councillors, have been turned down by SIRG.

SIRG has no public profile, and therefore WTT would recommend that a channel of communication should be established between SIRG and local communities, possibly through councillors, who are in a prime position to convey the aspirations of both residents and commercial organisations. Hopefully also, this would enable the public to understand better SIRG'S point of view.

WESTMINSTER TREE TRUST

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This response from Westminster Tree Trust to the City of Westminster 'Trees and the Public Realm' Draft Supplementary Planning Document December 2009, will be posted on the WTT website.

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