



BLACKBURN WITH DARWEN BOROUGH COUNCIL

ENVIRONMENT PORTFOLIO



# TREE AND WOODLAND STRATEGY (TAWS)

2023





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## 2. Foreword

Trees are vital to our environment for a wide range of reasons. This Tree and Woodland Strategy (TAWS) has been developed to formally acknowledge the long-term benefits that trees and woodland can bring to our local communities in Blackburn with Darwen and the commitment we have made to foster and protect it.

Our plan sets out a vision for how we will manage our trees and woodland areas as well as provide future growth and planting opportunities. It has been produced in collaboration with various Council services, including the Environment team and the Growth team. This is to ensure it responds to the variety of needs of all its users, whether providing tree maintenance, tackling pests and disease, delivering tree planting projects, mitigating carbon emissions, conserving biodiversity, or deciding planning applications.

The approach laid out in the plan is designed to ensure all decisions and activities will be made in a consistent and structured way, establishing an action plan to deliver the strategy and a plan for how those actions will be monitored. This will keep the document relevant, purposeful, and useful across Council services.

Ultimately, the strategy is tied together by the underlying recognition of the value of trees and woodlands and how green spaces and access to nature heavily impacts our quality of life.

We owe it to our residents to deliver them the best conditions and a plan for how we can all best work together to protect, maintain, improve and expand the borough's trees, hedgerows and woodlands.

**SIGNATURE/PHOTO**

**Councillor Jim Smith**

Executive Member for Environment  
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### 3. Council Missions

Which of the Council's missions does this strategy meet?

- Deliver our climate emergency action plan.
- Build healthier, happier and safer communities.

### 4. Scope of the Strategy

This Strategy begins by setting out the social, environmental and economic importance of trees and future threats; provides an illustrative baseline of current tree and woodland stock within the borough; and outlines relevant national and local policy, guidance and strategies relevant to the need for, and development of, the strategy.

It then presents a vision of where we want the borough to be by 2030 and introduces a series of objectives to achieve that vision, with those objectives then supported by a series of identified actions, set out in an Action Plan. The actions within that plan can then be monitored to regularly review performance against the aims of the strategy. At this stage of the strategy, actions are intentionally high-level to outline the broad actions required to support our trees and woodland. It is intended that further work will then be undertaken, with relevant partners, to identify the necessary detailed interventions that can be made – for example, the identification and prioritisation of specific tree planting sites. A more-detailed Action Plan, for implementation and management, will then be developed to ensure that performance against the strategy can be maintained and tracked.

The TAWS provides the strategic framework for the management of our current and future tree stock. It provides a Management Plan to set out our approach to managing our existing stock and minimising the avoidable loss of trees, and then establishes how the Council will identify new planting opportunities and manage woodland to provide a tree-legacy for future generations.

The Strategy will be used across the Council to provide information to guide tree, woodland and hedgerow management and maintenance, and new tree and woodland planting.

The TAWS is a key delivery strand of Blackburn with Darwen's Climate Emergency Action Plan (CEAP), which set out the actions that the Council and others will take to work towards becoming a carbon neutral borough by 2030, including planting more trees to capture carbon. The Climate Emergency Action Plan was drawn up in response to the Council's Declaration of a Climate Emergency in 2019. Delivery of the Plan is one of the four core missions of the Council's new Corporate Plan for 2023/27.

## 5. Importance of Trees and Woodlands

### 5.1. Benefits of Trees and the Woodlands

Trees and woodlands provide a range of environmental, social and economic benefits. The Council recognise their importance and have developed this strategy to enable us to appropriately maintain and manage our existing stock and plan for the future of our treescape to ensure the value of trees is upheld and improved upon. The Council has a role in ensuring that trees and woodlands are maintained to provide benefits long into the future.

#### 5.1.1. Environmental Benefits

The environmental benefits of trees and woodlands include:

- Improving air quality by absorbing gaseous pollutants and producing oxygen.
- Maintaining healthy soil composition.
- Providing shelter from wind.
- Providing shading that help to reduce urban temperatures.
- Providing habitats for a range of wildlife.
- Supporting pollinators.
- A source of biodiversity in their own right; and
- Maximising flood protection in a number of ways:
  - If there is more canopy cover, rain hits the ground slower as it must travel down the leaves, branches and tree trunks first. This is known as interception and can spread the effect of heavy rainfall over a longer period of time, allowing water to evaporate into the atmosphere before even reaching the ground (some studies suggest up to 30%<sup>1</sup>).
  - Tree roots also help water penetrate deeper into the soil, so there is reduced surface run off and more water storage in the soil. This is especially important in built-up areas with little penetrable surfaces like pavements and roads.
  - Trees, shrubs and deadwood along riverbanks and on floodplains also act as a drag on floodwater, slowing the flow at times of flooding, and can even be used to direct floodwater into preferential areas for temporary storage.

#### 5.1.2. Social, Health and Wellbeing Benefits

Trees provide a host of physical health and mental wellbeing benefits by making our environment and lives more enjoyable, including:

- Providing character and a sense of place.
- Providing 'green spaces' to support recreation and leisure opportunities.
- Supporting access to nature - this was a proven benefit during the Covid-19 pandemic to reduce stress, isolation and loneliness.
- Providing historic character, as mature trees provide a link to actions from the past that have prevailed till today.
- Providing views for homeowners and visitors.
- Enhancing privacy and screening undesirable features.
- Absorbing urban noise and improving air quality.

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<sup>1</sup> [Can trees and woods help reduce flooding? - Woodland Trust](#)

- Opportunities to improve health and diet through food-producing trees and hedges.
- Supporting community and reducing social isolation – for example, through group walks, tree planting volunteering programmes and litter picking in nature.

### 5.1.3. Economic Benefits

Natural capital refers to the aspects of nature that provide value to society by way of goods and services to support human life and wellbeing. It focuses on the economic benefits of natural assets - like woodlands and soil - and how we rely on them to function, including clean air and water, medicine and food, temperature and weather regulation. Trees and woodlands, as natural assets, provide economic value for a range of reasons and wide-reaching benefits, including:

- Direct value from the goods and services produced by or in woodlands (e.g., timber).
- Recreational benefits that can generate income.
- Reducing incidences of flooding and, with it, adding value by reducing insurance premiums and saving money from potential flood damage.
- Reducing NHS health-care costs from mental or physical health issues that can be reduced by spending time around nature etc.
- Increasing the appeal of areas to live – the aesthetic value of trees and areas with more green spaces are deemed to be worth more and typically command higher house prices.
- Being valuable in themselves without a ‘use’ especially when considering biodiversity for future generations.

The Woodland Trust has estimated that based on the range of values of trees and woodlands, the total economic value of UK woodlands is around £270 billion<sup>2</sup>.

## 5.2. Addressing the Climate and Biodiversity Emergencies

### 5.2.1. Climate Mitigation

Climate change is one of the biggest challenges facing the world now and in the future. It refers to a shift in global weather conditions, caused by the burning of fossil fuels (oil, gas, coal etc.) for things like fuel and power which, when burned, produce carbon dioxide and other greenhouse gases which then trap heat in the earth’s atmosphere and cause temperatures to rise. Without urgent action, we will see catastrophic warming – with droughts, rising sea levels and flooding, and mass extinction of nature. Climate change is, more accurately, a climate emergency.

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<sup>2</sup> [economic-benefits-of-woodland.pdf \(woodlandtrust.org.uk\)](https://www.woodlandtrust.org.uk/economic-benefits-of-woodland.pdf)

It is imperative that countries reduce their carbon footprint by limiting activities that produce greenhouse gases. Trees, along with other natural capital, such as peatlands and hedges, capture and store carbon dioxide (CO<sub>2</sub>), a greenhouse gas, through photosynthesis. This is why planting and maintaining tree stock is crucial to fighting the climate crisis, and it is one of the most cost-effective actions to reduce an area's carbon footprint.

Trees that are planted now do not store, or 'sequester', as much carbon as they will when they are fully matured. Hence, the full benefits in this sense are not achieved until many years after planting. This is important because it links future generations to those alive now. Future generations are likely to experience more extreme impacts from climate change due to the actions of generations before them. By planting trees, we can help secure better prospects for those generations by giving them more trees and woodlands that can mitigate and adapt to climate change.

Several factors also determine CO<sub>2</sub> sequestering rates, including species, maturity, location, conditions of the tree, and external water/air pollution levels. Therefore, in the fight against climate change, trees should be used as one of the tools, but not the only tool. A reduction in greenhouse gases must also occur as trees have been unable to absorb CO<sub>2</sub> at the rate at which humans are producing it. Further, trees can become a source of CO<sub>2</sub> if they die and decay or are burnt so correct management is imperative.

### 5.2.2. Climate Adaptation

Science proves the Earth is heating up due to human activities. Whilst we can take steps to reduce our greenhouse gases (mitigation), we also need to improve our resilience to a changing climate (adaptation).

Carbon storage is not the only positive asset of trees in combatting climate change. Trees and woodlands can help to absorb the impact of other climatic factors influenced by climate change and thus are essential tools for climate adaptation and resilience building.

For example, climate change will create increased precipitation which can lead to flooding, and trees and woodlands can help to reduce the impacts of flooding by absorbing water. They are therefore a crucial defence against future flooding from climate change. Further, their leaves and branches can provide shaded conditions, which will help reduce the temperatures of the microclimate at the local level. This will be important as temperatures increase, both domestically and across the globe.

The UK government has set a target to become carbon net-zero by 2050, with a commitment to improve the tree cover of the UK from 13% to 19%. In total, 1.5 million hectares of additional



woodland is needed across the UK (the same land area as Yorkshire!), and so our borough wants to do its bit to help reach this target.

### 5.2.3. The Biodiversity Emergency

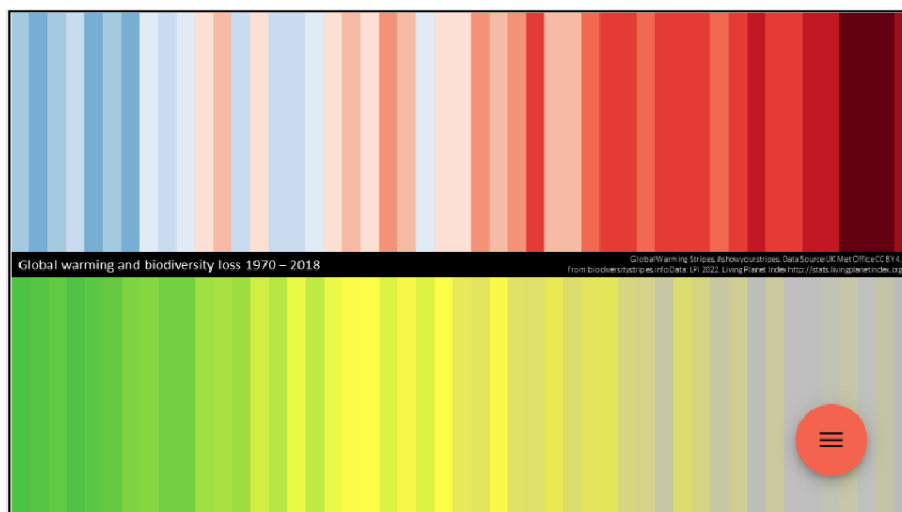
2.14 Biodiversity is the variety of all living things on Earth and how they fit together in a web of life, bringing oxygen, water, food and countless other benefits. Nature is at the base of our supply chain. However, wildlife is declining faster now than at any other time in human history. The UK has lost 13% of our native species abundance since 1970<sup>3</sup> and this will continue without change.

2.15 One of the biggest drivers of its decline is the loss of natural habitat, aside from climate change, pollution and invasive species and disease. By restoring our habitats and planting new native woodland with UK-grown trees, we can extend and create habitats for wildlife and re-strengthen nature. The Council’s Climate Change and Natural Capital Study (2021) identifies the Borough’s woodland habitats as of significant importance for supporting habitat provision and identifies a series of opportunities for their enhancement.

The climate and biodiversity emergencies are inextricably linked, and we cannot solve one without the other. In addition to addressing the climate and biodiversity emergencies, there are lots of other benefits that trees and woodlands can deliver.

Figure 1: Figure 1: Global warming and biodiversity loss 1970-2018

The top row shows the increase in global temperatures over time, with the bottom row showing the loss in global biodiversity over the same time period. Biodiversity is declining as temperatures increase, showing the two crises are closely linked.



Source: Miles Richardson / University of Derby: [Biodiversitystripes.info](http://Biodiversitystripes.info)

<sup>3</sup> State of Nature Report 2019, nbn.org.uk - [State of Nature 2019 - National Biodiversity Network \(nbn.org.uk\)](https://www.nbn.org.uk/state-of-nature-2019)

## 5.3. Threats to Trees and Woodlands

### 5.3.1. Climate Change and the Biodiversity Crisis

Climate change is increasing the risks of pests and diseases to our current and future tree stock, and as climate change gets more intense, so does this risk.



It also adding stress to trees and surrounding areas, through the increased frequency of floods, storms and drought conditions that will impact the ability of some trees to grow and survive, worsening the death rate before maturity. Birch

and beech trees are particularly sensitive to drought and the loss of these trees would lead to changes to the composition and structure of woodlands. Furthermore, as temperatures get warmer, this could impact the growing season of the tree, which may have a knock-on effect for the surrounding flora and fauna that may be reliant on trees, impacting the wider ecosystem.

Therefore, it is essential to mitigate climate change and reduce its impacts, and trees are a fundamental part of this. As outlined above, they can absorb carbon emissions to offset the greenhouse gas effect from burning fossil fuels, can absorb water in their soils to help mitigate effects from flooding (and their roots help to reduce soil erosion and landslides from increased water in the soil), and their branches and leaves can lower the temperature of the microclimate by providing shade.

By planting more trees and woodlands, we will be assisting in boosting our local biodiversity by creating new, resilient habitats, and helping to mitigate and adapt to climate change.

### 5.3.2. New Development

Trees and woodlands are sometimes under threat by plans to remove them to make way for development and/or the construction of infrastructure. Development can impact trees and woodlands through:

- Pollution (causing wildlife poisoning, reduced tree health, changes to flora/fauna and soil composition).
- Habitat disturbance (increased predation, reduced breeding successes, altered soil composition and water functioning).
- Fragmentation (interrupting natural flows and increased distance between habitats, subdividing populations).

- Introduction of non-native plants (increased soil movement, changing soil conditions, increased risk of pest and diseases); and
- Other cumulative effects.

National and local policies and regulations are used to ensure where felling is necessary or unavoidable, it is done in a considered way. Further information on planning priorities and policy are explained in the Planning Section of this strategy.

### 5.3.3. Pests and Diseases

Pests and diseases are a major threat to trees. Currently, there are a considerable number of pests and diseases in the UK posing a challenge to the longevity and survival of our trees, which are listed below:

#### Diseases:

- Acute oak decline
- Anthracnose of plane trees (*Apiognomonia veneta*)
- Ash dieback / Chalara ash dieback (*Hymenoscyphus fraxineus*)
- Bleeding canker of horse chestnut (*Pseudomonas syringae* pv. *aesculi*)
- Canker stain of plane (*Ceratocystis platani*)
- Conifer root and butt rot (*Heterobasidion annosum*)
- Chronic oak dieback
- Dothistroma / red-band needle blight of pine (*Dothistroma septosporum*)
- Dutch elm disease (*Ophiostoma novo-ulmi*)
- Elbow-patch crust disease of plane (*Fomitiporia punctata*)
- Elm yellows (*Candidatus Phytoplasma ulmi*)
- Massaria disease of plane (*Splanchnonema platani*)
- Neonectria canker of fir (*Neonectria neomacrospora*)
- Oak wilt (*Ceratocystis fagacearum*/*Bretziella fagacearum*)
- *Phytophthora alni* disease of alder
- *Phytophthora austrocedri* disease of juniper
- *Phytophthora kernoviae*
- *Phytophthora lateralis*
- *Phytophthora pluvialis*
- *Phytophthora ramorum*
- Pitch canker of pine (*Fusarium circinatum*)

- Sirococcus blight of cedar and hemlock (*Sirococcus tsugae*)
- Sweet chestnut blight (*Cryphonectria parasitica*)
- Thousand cankers disease of walnut (*Geosmithia morbida*)
- Xylella (*Xylella fastidiosa*)

**Insects:**

- Asian longhorn beetle (*Anoplophora glabripennis*)
- Bronze birch borer (*Agrilus anxius*)
- Budworm pests of conifer trees – multiple species
- Citrus longhorn beetle (*Anoplophora chinensis*)
- Elm zigzag sawfly (*Aproceros leucopoda*)
- Emerald ash borer (*Agrilus planipennis*)
- Great spruce bark beetle (*Dendroctonus micans*)
- Green spruce aphid (*Elatobium abietinum*)
- Gypsy moth (*Lymantria dispar*)
- Horse chestnut leaf miner (*Cameraria ohridella*)
- Large larch bark beetle (*Ips cembrae*)
- Large pine weevil (*Hylobius abietis*)
- Larger eight-toothed European spruce bark beetle (*Ips typographus*)
- Oak lace bug (*Corythucha arcuata*)
- Oak pinhole borer (*Platypus cylindrus*)
- Oak processionary moth (*Thaumetopoea processionea*)
- Oriental chestnut gall wasp (*Dryocosmus kuriphilus*)
- Pine-tree lappet moth (*Dendrolimus pini*)
- Pine processionary moth (*Thaumetopoea pityocampa*)
- Pine wood nematode (*Bursaphelenchus xylophilus*)
- Red-necked longhorn beetle (*Aromia bungii*)
- Siberian silk moth (*Dendrolimus sibiricus*)
- Two-lined chestnut borer (*Agrilus bilineatus*)
- Two-spotted oak buprestid beetle (*Agrilus biguttatus*)

**Mammals:**

- Grey squirrels
- Livestock overgrazing in upland woodlands
- Preventing mammal damage to trees and woodland

- Recognising types of mammal damage to trees and woodland
- Reducing the impact of non-native or invasive vertebrates to forestry

#### 5.3.4. Ash Dieback

One of the bigger challenges that the borough is currently working hard to defend against is Ash dieback (*Hymenoscyphus fraxineus*) which is estimated to cost British society £15 billion, with £7 billion of that being over the next 10 years. We have ownership of thousands of Ash trees in the borough and could possibly face losing 80% of these stocks if action is not methodical. This disease is UK-wide, and we are still in the beginning of this epidemic, and its slow onset means we are unlikely to know the full impact for a while. This is why careful tracking of subtle changes is crucial and relies on careful management. There is currently no cure or clear method to stop its spread, and the aim of management will be to slow the spread, minimise the impact of disease, and preserve as many tolerant ash trees as possible.

Further information is available from the [Woodland Trust](#) (Key tree pests and diseases). If you spot signs of tree disease, or if something looks strange, visit [TreeAlert - Forest Research](#) to track these observations.

#### 5.3.5. Vandalism

In the borough, there have been cases of vandalism on newly planted trees. To combat this, we aim to increase awareness of the benefits of trees and the reasons for planting in specific areas, to hopefully reduce the vandalism that is caused by ignorance. The importance of trees should act as a deterrent to destruction, especially to younger members of the community who stand to gain the most from the trees in the future.

#### 5.3.6. Neglect

Many of the Borough's woods have been managed in some way during their lifetime. Their structure and make-up today result from years of interaction with people and sometimes livestock.

The cost of management, and the low value of many woodland products, means that it is often not economically viable to continue to manage woods. This does not always lead to a decline in their value for wildlife, but it may do.

Woodlands that aren't managed may:

- become more vulnerable to overgrazing or invasive species.

- suffer the loss of ground flora species or decline of mature trees due to shading out or competition from the uncontrolled growth of young trees.

## 6. Relevant Legislation, Strategy and Policy

The strategies, policies and guidance documents below highlight the importance of increasing tree provision and canopy coverage to address a wide variety of matters, including climate mitigation and adaptation, capturing carbon, reducing flood risk, biodiversity and habitat improvements and restoration, reducing inequalities, improving health and wellbeing and the creation of well-designed and healthy places. This Tree and Woodland Strategy is designed to provide the necessary framework to guide the protection, maintenance and provision of trees and woodland in the borough to meet all of the Council’s national obligations and local ambitions.

### 6.1. Legislation

<b>Natural Environment and Rural Communities (NERC) Act 2006:</b>	Placed a legal duty on all public authorities in England (including Councils) to have regard to conserving biodiversity as part of policy and decision making. This can include restoring or enhancing a habitat species population. Councils should be able to demonstrate they meet their duty through policies and strategies, the planning system and the management of land, buildings, woodlands, nature reserves, parks and open spaces, sports grounds etc.
<b>Climate Change Act 2008 (as amended):</b>	Establishes a legally binding target on the UK Government to reduce the UK’s greenhouse gas emissions by 100% by 2050 from 1990 levels.
<b>Planning and Compulsory Purchase Act 2004</b>	Places a duty on plan-making to mitigate and adapt to climate change.
<b>Environment Act 2021 (including BNG, LNRS)</b>	Sets clear statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste; and reversing the decline in species abundance by 2030.  It also introduces a series of measures to reverse the decline in biodiversity; including a requirement for all new development to deliver a minimum 10% biodiversity net gain from November 2023. In addition, it sets a requirement for the creation of nature recovery networks, led by Responsible Bodies, through local nature recovery networks and strategies.
<b>Town and Country Planning Act 1990, as amended by Town and Country Planning (Tree Preservation) (England) Regulations 2012</b>	Tree Preservation Orders (TPOs) are administered by local Planning Authorities and are made to protect trees that bring significant amenity benefit to the local area – particularly important where trees are under threat.

<b>The Hedgerow Regulations 1997</b>	These Regulations make provision for the protection of important hedgerows in England and Wales.
<b>Anti-social Behaviour Act 2003 (Part 8 - High Hedges)</b>	Part 8 of the Act allows local councils to deal with complaints about high hedges whose area contains the land on which the hedge is situated.

## 6.2. National Policy

<b>Net Zero Strategy 2021</b>	Sets out how the UK will deliver on its commitment to reach net zero emissions by 2050, including the allocation of £124m to boost the 'Nature for Climate Fund' to restore peatland and treble woodland creation in England to meet government commitments to create at least 30,000 hectares of woodland per year across the UK.
<b>25 Year Environment Plan 2018</b>	Sets out the Government's goals for improving the environment.
<b>Environmental Action Plan 2023</b>	The first revision of the 25 Year Environment Plan, setting out how the government will deliver each of their goals. This includes targets to increase tree canopy and woodland cover to 16% of total land area by 2050, as a key part of achieving the net zero strategy.
<b>England Trees Action Plan 2021-2024</b>	Sets out the government's long-term vision for the treescapes it wants to see in England by 2050 and beyond. It provides the strategic framework for implementing the Nature for Climate Fund.
<b>National Planning Policy Framework (2021)</b>	This provides the national planning policies for England and is accompanied by planning practice guidance. It underlines the planning system should support the transition to a low-carbon future, achieve well-designed places and enhance biodiversity. It highlights the importance of new tree planting (para 131) to the character and quality of urban environments and calls for tree-lined streets in new developments.

## 6.3. National Guidance

<b>National Design Guidance</b>	Sets out the characteristics to well-designed places, which include the incorporation of trees.
<b>Natural England Green Infrastructure Framework 2023</b>	Provides a structure to analyse where greenspace in urban environments is needed most, to support equitable access. It includes increased tree cover, increasing connectivity and extent of habitats and building resilience for climate change.
<b>British Standards</b>	Provide best practice advice to developers and LPAs. British Standards are a minimum requirement, and one should always aim to exceed advice.
<b>Committee for Climate Change recommendations 2023</b>	The latest assessment (2023) concluded the UK is not adequately prepared for climate change and more needs to be done to adapt.
<b>Tree and Woodland Strategy Toolkit (The Tree Council) 2023</b>	Provides guidance for how local authorities can develop Tree and Woodland Strategies.

## 6.4. Local Strategy / Policy / Guidance

<b>BwD Corporate Plan 2023-2027</b>	Seeks to enable each resident to achieve a good quality life, and in doing so, sets 4 missions – to improve prosperity, to provide the opportunities for young persons to fulfil their potential, to deliver the climate emergency action plan and to build happier, healthier and safer communities.
<b>BwD Climate Emergency Declaration &amp; Action Plan</b>	The Council declared a Climate Emergency in 2019 and committed to a target of being carbon neutral by 2030 to help tackle climate change. The Climate Emergency Action Plan sets out what needs to be done in the borough to help mitigate climate change and adapt to its impacts. The action plan includes measures to capture more carbon by planting more trees.
<b>Local Plan Part 1 &amp; Part 2</b>	Local Plans set out the strategy for future development in an area, addressing housing, employment, infrastructure as well as the natural environment and climate change.

## 7. Trees and Woodlands in Blackburn with Darwen

### Trees and Woodland in the Borough

The Borough covers 13,700 hectares of land, and contains thousands of trees located within woodlands, greenspaces, residential areas, schools, highways and parks. This provides an extensive network of trees and woodlands, located across both public (Council owned) and private land, which contribute to the character and heritage of the area, provide distinctive landscape features, capture carbon, improve air quality and provide habitats to support wildlife.



Some of the most prominent areas of trees and woodland are found within prestigious areas of green space. This includes Corporation Park, Witton Park, and Whitehall Park. It also includes areas of local importance, including Blackburn Cathedral, Turton Tower, Sunnyhurst Woods and Darwen Tower (which also contains blanket bog/moorland). Many trees are rooted in the borough's heritage. For instance, Coronation Park contains an oak tree planted for the coronation of Queen Elizabeth II.

Historically, many areas will likely have formed part of larger wooded areas providing food and fuel and have changed their roles and features over the years. More recently, new woodlands have also been created within the borough – for example, the publicly accessible '[Polyphemus - Woodland Trust](#)'



(Woodland Trust) was planted in 2005 with 15,000 trees to provide a new broadleaf woodland. In early 2022, some 6700 native trees were planted to create [15 micro-woodlands](#) as part of the Pennine Lancashire Treescapes project.

The Council are aware that the condition of woodland areas varies across the many different sites, and management works are required to improve woodland condition. It is intended that detailed management plans for each site will be developed in the future to support this strategy (detailed later in this strategy).

## Trees Outside Woodland

Whilst there is a great deal of historical information about woodland development, there is very little evidence that we can use to create a narrative for the evolution of those trees we find in and around towns and cities, and those scattered as single trees or small groups across the landscape.

The importance of hedgerow trees in the Blackburn with Darwen landscape is critical for the development and maintenance of biodiversity within the borough.

Many hedgerow trees have been removed since the 1950s, as the drive to increase agricultural production increased the grubbing out of hedgerow. The management of hedgerows with machinery often now prevents trees from emerging from within the hedge, and we are left with a declining hedgerow tree population. One of the reasons for the lack of information is that these trees were often 'left over' after cultivation in historic times, or more recently added as part of 'landscaping' provided for new developments within the borough.

We have identified a number of broad categories for these trees outside of woodland:

- **Trees in the rural landscape** – these are often hedgerow trees that are a characteristic feature of the Blackburn with Darwen landscape.
- **Trees along main roads** – these are often part of the hedgerow tree category, but often trees have been planted as part of the landscape improvements along new roads. Trees within falling distance of the road qualify in this category.
- **Street trees** – (not main roads) often are planted as part of the landscaping of new development. It is interesting to note the difference in tree cover between some areas of the borough, with extremely low tree cover, and some of the suburban developments, with much higher levels, perhaps historically inspired.

Street trees historically have been large trees. More recently, there has been a trend to plant smaller trees. These are trees that will not have the same long-term visual impact, nor provide the range of

benefits that larger trees do.

- **Parkland trees** – these may be remnants of historic landscape schemes or planted as part of the development of parks as the green lungs for towns and cities from the 1840s.
- **Garden trees** – planted or self-seeded, these also provide a large population of trees outside woodland.
- **Trees on institutional/corporate land** – schools and hospitals and the wider Local Authority estate often have trees within their grounds.
- **Trees in and around playgrounds/areas** – in some areas, trees may form part of the play infrastructure and provide support for rope swings and zip wires. These facilities are an important asset. These trees are identified as a specific category because they need to have both playground and tree safety inspections.
- **Commemorative trees** – whilst these may fall into other categories, it is worth highlighting that trees are often planted to commemorate people and events and have a special place in the culture of local communities and for individuals.
- **Ancient and veteran trees** – In a similar way, ancient and veteran trees could be found in any of the categories described above. Britain has a high proportion of Europe’s ancient and veteran trees. They are essential elements of many landscapes, provide a rich habitat for many species and are of cultural significance for Blackburn with Darwen.

There are many overlaps in these categories, but they provide a framework for the strategy and helpfully shape the assessment and management regimes for the council.

### Canopy Cover by Ward

In 2018, Trees for Cities, Brillanto, Woodland Trust and Forest Research set up a project to assess tree canopy cover in the urban realm for each ward of England, Scotland and Wales, with the hope of helping inform Local Authorities on how to improve the management of urban trees and where to target future planting. They used the ‘i-tree canopy tool’ to estimate the canopy cover for each ward and, at a national level, estimated an average canopy cover of 15.8%<sup>4</sup>.

Their published data for BwD shows an average of 14.2% across urban wards, below that of the UK average. The highest levels of canopy cover are within Billinge and Beardwood (28%) and Shear Brow and Corporation Park (21%), which both have large areas of parkland and open space including trees (Witton Park and Corporation Park respectively). The lowest levels are

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<sup>4</sup> [UK Urban Canopy Cover - Forest Research](#)

found within Darwen East (9%) and the inner urban areas where space for trees is often more limited. On the whole, canopy cover across most of the BwD wards is lower than the national average.

Much of the rural, southern areas of the Borough are peatland/moorland which, by their nature, support fewer trees.

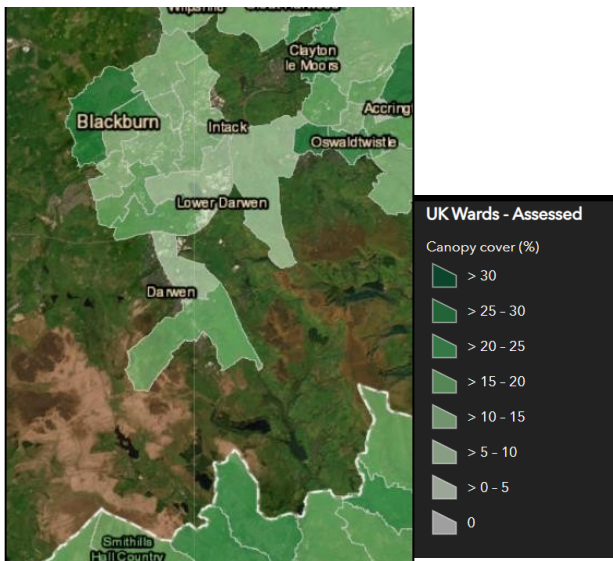
The latest Council estimates (2023) suggest the total canopy cover for the Borough is 17.5% of the Borough's area, slightly higher than the 2018 urban area estimates of 14.2%.

*Table 1: Canopy Cover by BwD Wards*

<b>Ward</b>	<b>Canopy Cover (2019)</b>
Audley & Queens Park	10.3%
Bastwell & Daisyfield	10.3%
Billinge & Beardwood	27.6%
Blackburn Central	10.1%
Blackburn South & Lower Darwen	18.3%
Blackburn South-East	10%
Darwen East	9.%
Darwen South	16%
Ewood	16%
Little Harwood & Whitebirk	12.0%
Mill Hill & Moorgate	11.2%
Roe Lee	15%
Shear Brow and Corporation Park	21.4%
Wensley Fold	12%

Source: [GB Ward Canopy Cover WebMap \(arcgis.com\)](#)

Figure 2: Percentage of canopy cover by ward

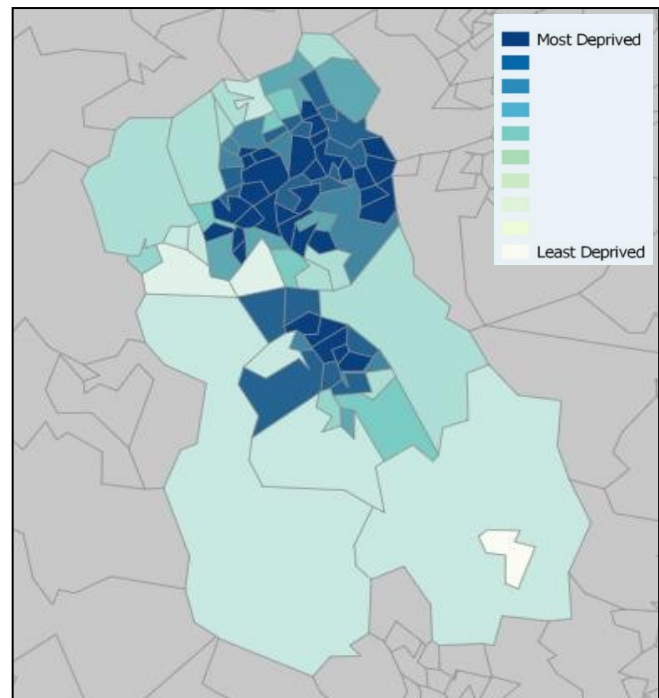


Source: [GB Ward Canopy Cover WebMap \(arcgis.com\)](http://GB Ward Canopy Cover WebMap (arcgis.com))

### Deprivation

Blackburn is amongst the most deprived areas in the country. There is often a strong correlation between low canopy cover (a measure of environmental deprivation) and social deprivation. This means that people in deprived areas have less opportunity to benefit from urban trees and are more vulnerable to climate and environmental injustice – for example, less able to benefit from shading and cooling provided by trees as the temperatures increase. Broadly, the areas of highest deprivation (shown by the darkest colours on the Figure 3 map) correlate with the lower levels of canopy cover (Table 1/ Figure 2).

Figure 3: Levels of deprivation

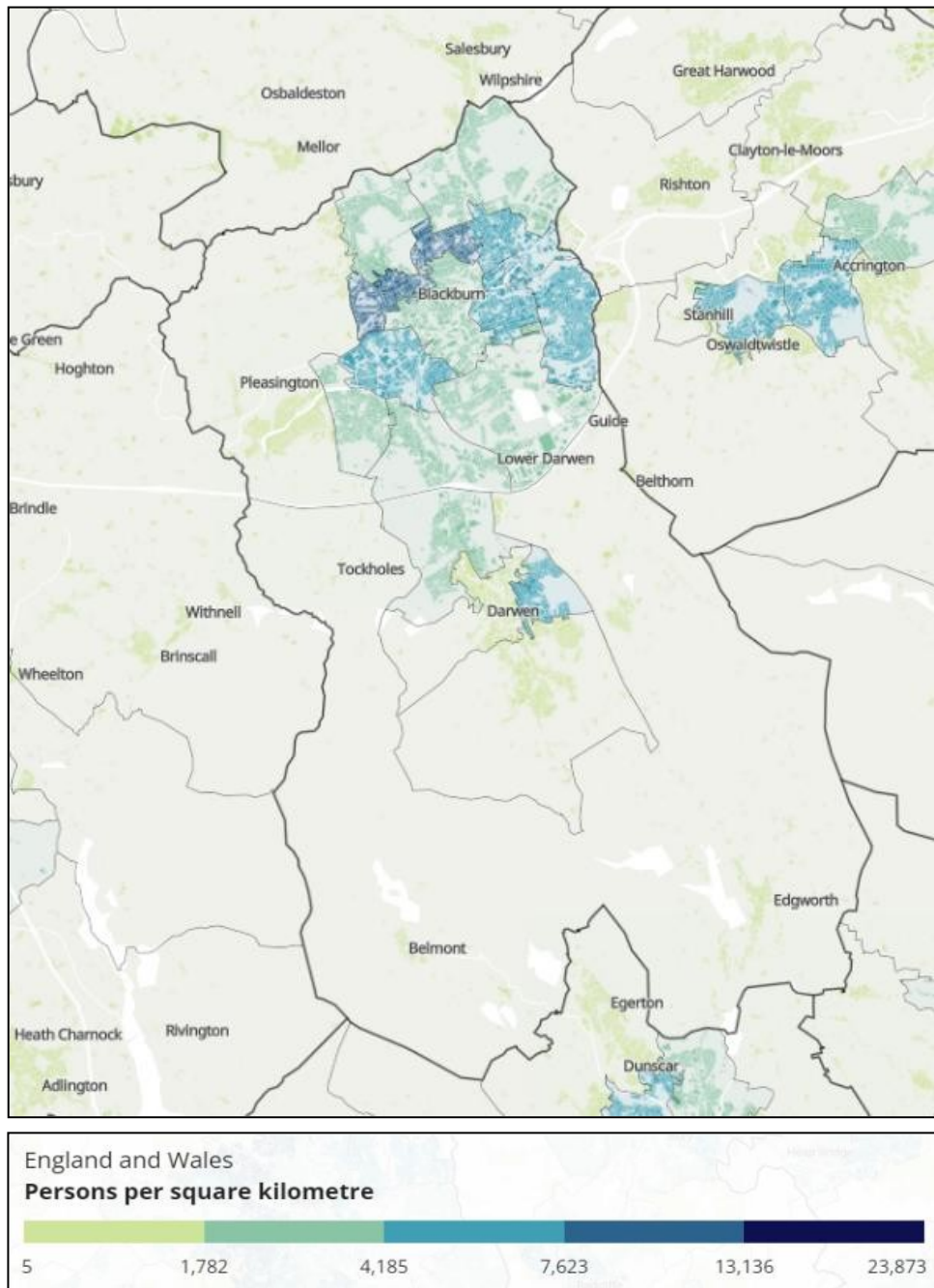


Source: MHCLG 2023 (IMD 2019) ([map](#))

### Population Density

The most densely populated areas of the borough are located within the urban areas. Together with the other data (above), this broadly shows that the most populated (highest density) areas correlate with those areas with higher levels of deprivation and the lowest levels of existing canopy cover.

Figure 4: Population density (at MSOA level)

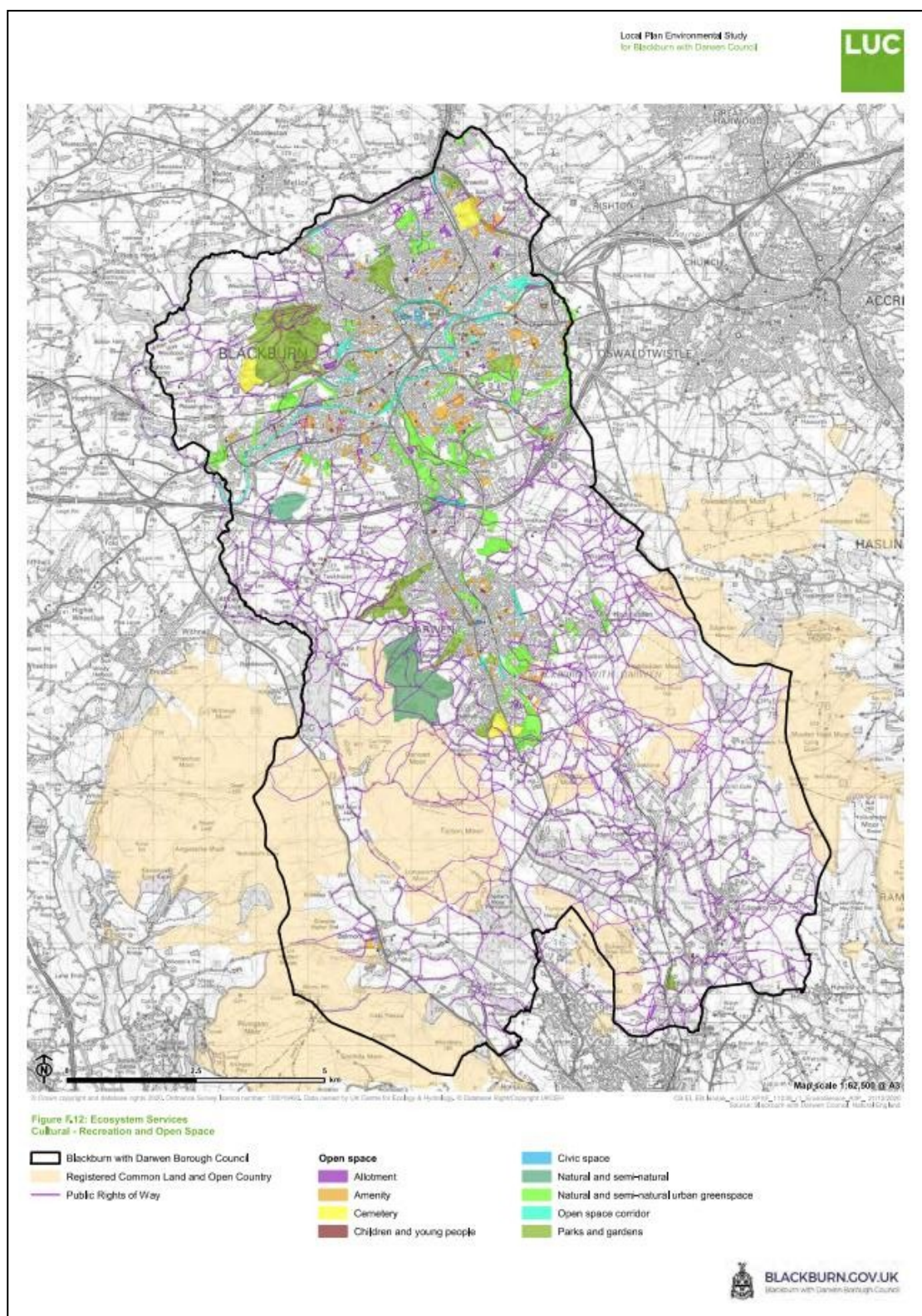


Source: [ONS Census 2021](https://www.ons.gov.uk/census/2021-census)

## Recreation and Open Spaces

The Borough has a wide variety of recreation and open spaces, with the Council owning and managing over 250 sites. This includes green spaces, natural and semi-natural open spaces, parks, gardens (some of which are historic) cemeteries, allotments, open spaces and amenity spaces. Trees form an intrinsic part of many of these sites, and the Council, as landowner, has a major role in their management (Figure 5).

Figure 5: Recreation and Open Spaces

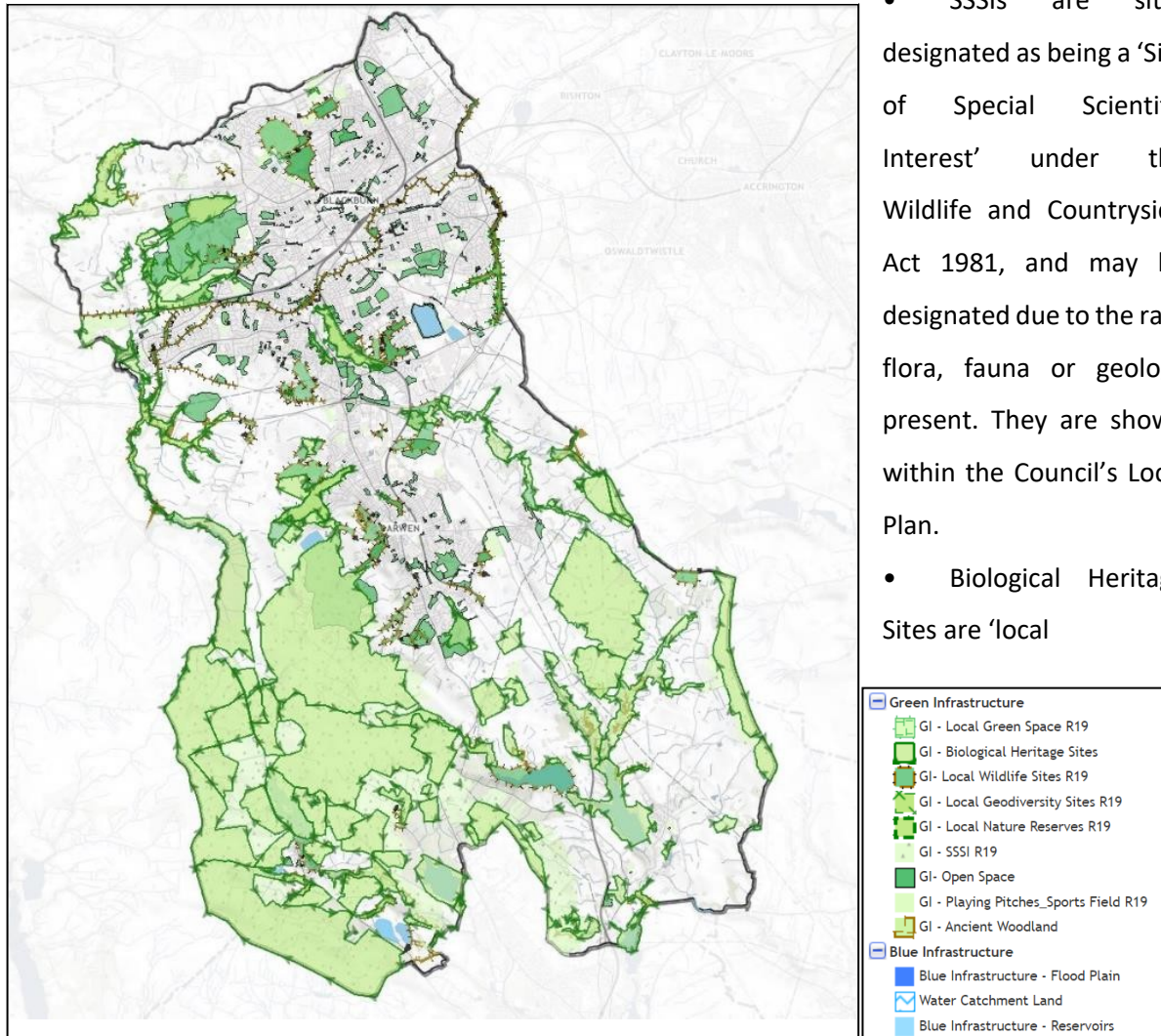


Source: Climate Change and Natural Capital Study (CCNCS) (BwDBC/LUC) 2021

## Green and Blue Infrastructure

The borough has a wide variety of environmental sites, including District Wildlife Sites (DWSs), Biological Heritage Sites (BHSs), Sites of Special Scientific Interest (SSSI), local geodiversity sites, nature reserves, open spaces, playing pitches and ancient woodlands which together make up our Green Infrastructure.

Figure 6: Green and Blue Infrastructure



- SSSIs are sites designated as being a ‘Site of Special Scientific Interest’ under the Wildlife and Countryside Act 1981, and may be designated due to the rare flora, fauna or geology present. They are shown within the Council’s Local Plan.
- Biological Heritage Sites are ‘local

Source: BwDBC 2023 [Local Plan \(Aurora\)](#)

wildlife sites in Lancashire and are identified using a set of published guidelines that enable the identification of sites which, together with statutory wildlife sites, make the most significant contribution to the biodiversity of Lancashire. BHSs are managed by the Lancashire Biodiversity Partnership C and are mapped as [nature recovery sites](#). They are also designated within the Council’s Local Plan.

- District Wildlife Sites (DWSs) are areas of land which have been identified as being of local importance in providing habitats for wildlife, and, again, are identified using a set of

published guidelines. DWSs are the responsibility of Blackburn with Darwen Borough Council and are designated within the Council's Local Plan.

There is also Blue Infrastructure which encompasses the reservoirs, canals, rivers and other wetlands in the Borough. Green and Blue Infrastructure may be in public or private ownership. Those sites with high ecological value, such as DWS, BHS and SSSIs, need to be considered in identifying new planting opportunities to ensure that habitats are not negatively impacted by new planting. Similarly, it is important to consider those habitats that could be improved by enhanced woodland management.

## Woodlands

Figure 7 shows the existing woodland in the borough, for both broadleaved (shown in pink) and coniferous (green). Much of the coniferous woodland is located in the south of the borough. The connectivity of different woodlands is imperative to allow species to move between sites. As the UK heats up, as a consequence of climate change, many species are expected to migrate north. Wildlife and woodland corridors help provide some of these ecological networks. The Government want a national network of connecting habitats and corridors as part of ambitions for 'Local Nature Recovery Strategies' (LNRS). LNRSs will be developed in line with environmental designated sites/opportunities and will iteratively inform the strategies of the TAWS.



Figure 7: Existing Woodland

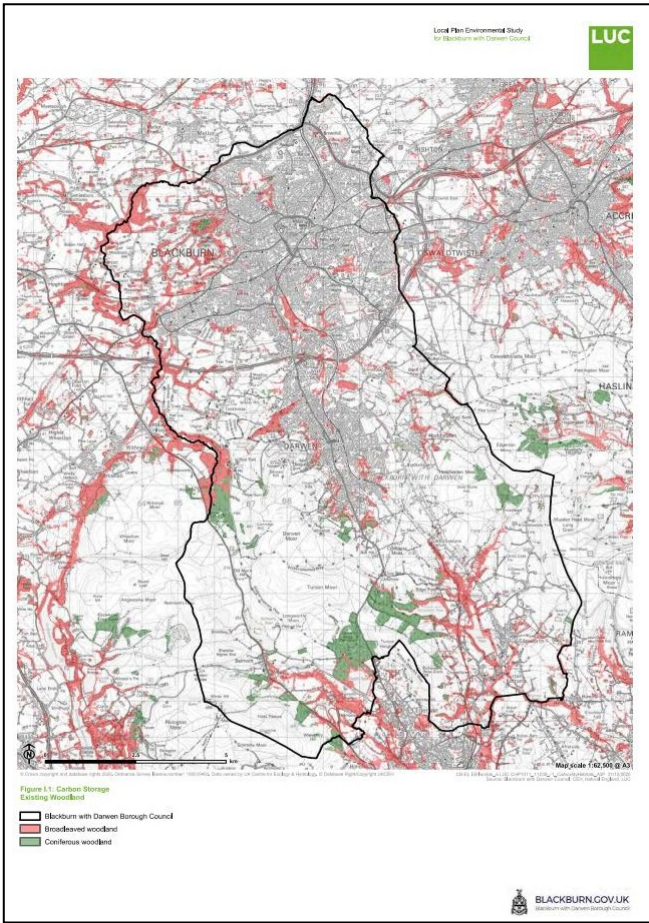
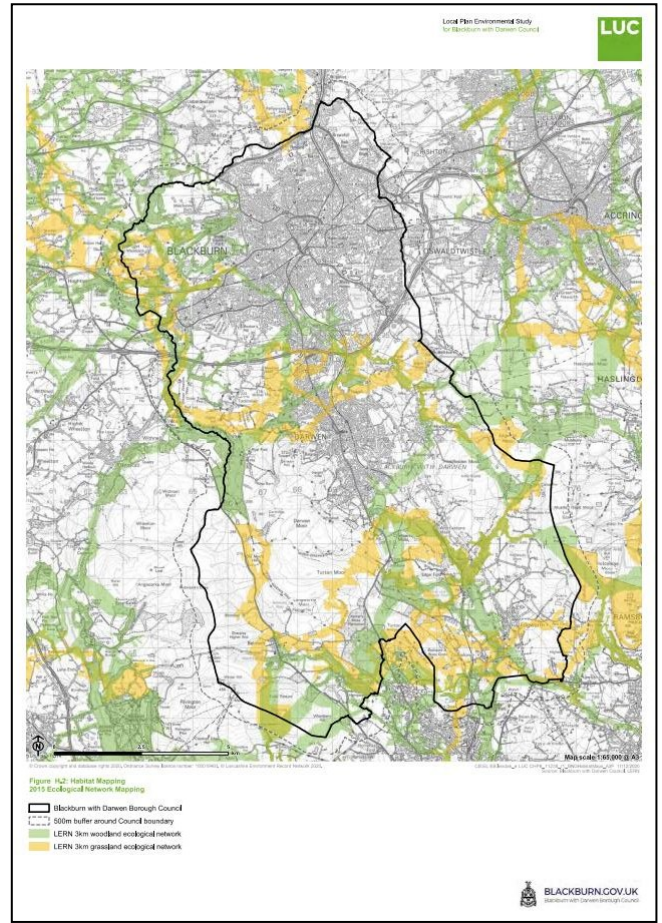


Figure 8: 2015 Ecological Networks (woodland)



Source: [Climate Change and Natural Capital Study \(CCNCS\) \(BwDBC/LUC\) 2021](#)

Of course, there is also lots of tree cover outside our woodlands. [Forest Research](#) have undertaken inventory reports estimating woodlands and tree cover outside of woodlands. They have published regional maps (including the North West) showing patterns of tree cover. 3.6% of land area is classed as tree cover outside of woodlands in North West England<sup>5</sup>.

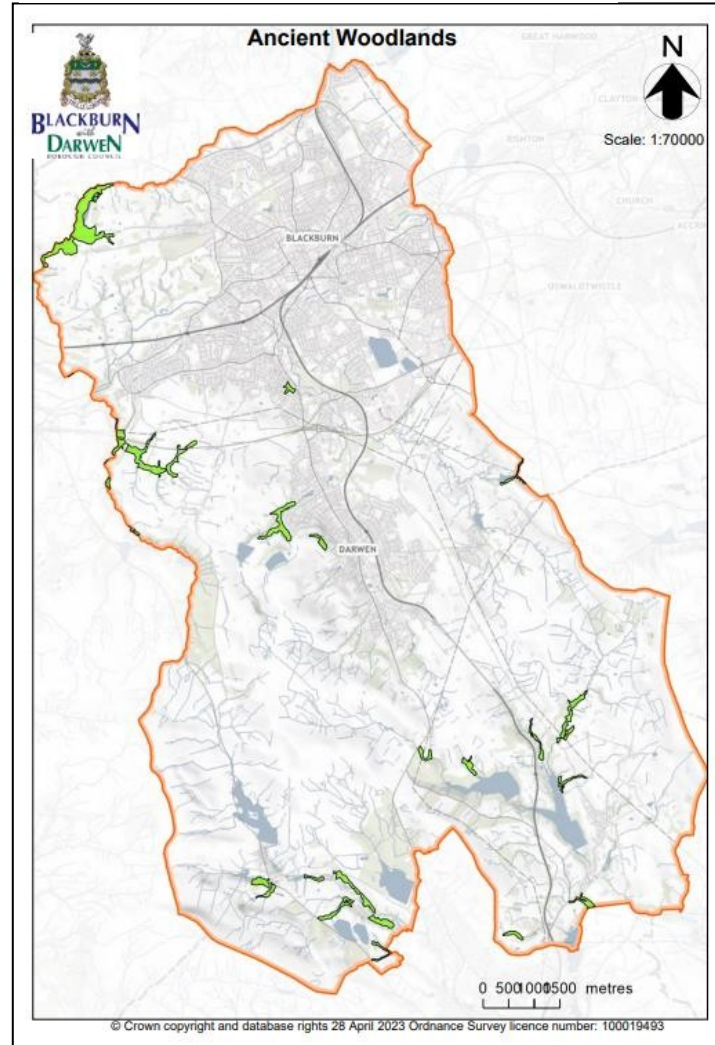
### Ancient Woodlands

Blackburn with Darwen has 34 ancient and semi-natural woodlands over 2ha. Ancient woodland covers only 2.5% of the UK<sup>6</sup> and describes woodland that has been in existence since (at least) 1600 when records started to be collected. They are irreplaceable and an important habitat in need of protection. Nationally, many ancient woodlands are at risk from overgrazing, invasive species and incorrect planting. Restoration helps remove these threats, regenerate trees and plants and help woodland thrive.

<sup>5</sup> [What our woodlands, and tree cover outside woodlands, are like today; NFI inventory reports and woodland](#)

<sup>6</sup> [Ancient Woodland - British Habitats - Woodland Trust](#)

Figure 9: Ancient Woodlands



Source: BwD Local Plan 2023; DM17 – Trees and Woodland

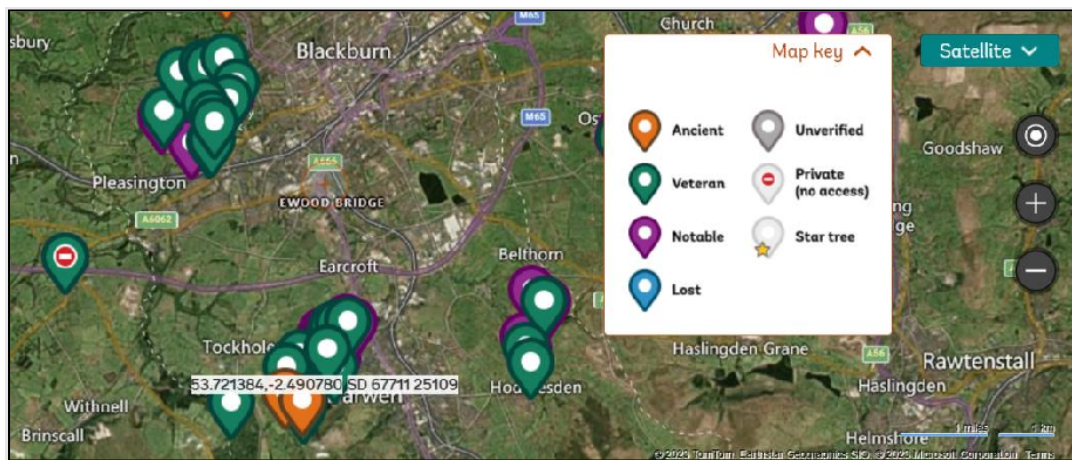
### **Veteran Trees**

Ancient and veteran trees can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands and are irreplaceable habitats. Ancient trees are exceptionally valuable, and can be included for their great age, size, condition, biodiversity value or cultural/heritage value. Very few trees of any species become ancient.


Veteran trees may not be that old, but have significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value. All ancient trees are veteran trees, but not all veteran trees are ancient. Notable trees are usually mature trees which may stand out in the local environment because they are large in comparison with other trees around them.

The Woodland Trust publish an [Ancient Tree Inventory](#) (ATI) which has an interactive map showing ancient, veteran and notable trees. It uses ‘citizen science’ - anyone who spots an old tree can submit its details, online, to the Trust to have it verified and added as a record. The ATI shows a number of ancient, veteran and notable trees within the borough, with the majority clustered around Witton Park and Sunnyhurst Woods. Clicking each mapped point from the ATI website, shows the details of each tree. However, only a small proportion of ancient or veteran trees are recorded on this inventory. Other inventories are maintained by [Natural England](#) (Ancient Woodland Inventory, Wood Pasture and Parkland Inventory (including ancient sites)).

Figure 10: Screenshots of the Woodland Trust Inventory



**Common ash**  
Lancashire  
Recorded by: Not specified, Lancashire Heritage Trees Survey



View photos

**About the tree** Show more

Species:	<b>Common ash</b> <small>Fraxinus excelsior</small>
Form:	<b>Multi stem</b>
Standing or fallen:	<b>Standing</b>
Living status:	<b>Alive</b>
Girth:	<b>3.10m at a height of 1.00m</b>
Veteran status:	<b>Veteran tree</b>

Manage

Source: [Ancient Tree Inventory](#) (ATI), Woodland Trust 2023

### Priority Habitats

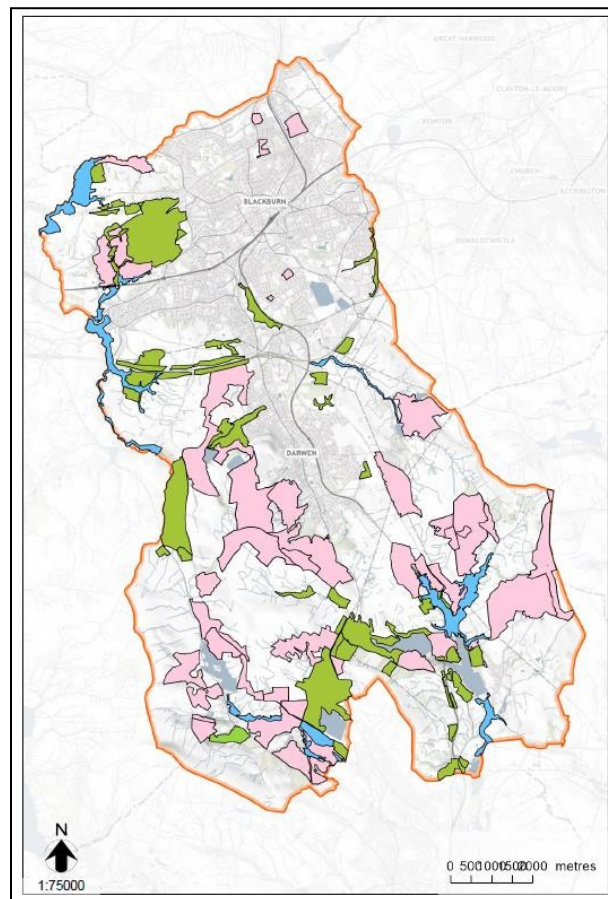
Priority Habitats are those which have been deemed to be of principal importance for the purpose of conserving biodiversity, being listed in the UK Biodiversity Action Plan, (a requirement of the Natural Environment and Rural Communities Act (2006), Section 41) and where maintenance and restoration should be promoted. Data is mapped by Natural England and available on their [Priority Habitats](#)

[Inventory](#). It includes areas of wood pasture, woodlands and orchards. Many of the areas are identified by the Council under other designations, for example, District Wildlife Sites, parks and open spaces.

### Environmental Opportunity Areas (EOAs)

The Council commissioned a Climate Change and Natural Capital Study (2021) to inform the preparation of their Local Plan. Its purpose was to assess climate change, biodiversity and green infrastructure in the Borough and identify how the Local Plan can contribute towards achieving carbon neutrality by 2030, and to address the requirements of the Environment Act. It identified natural assets and informed the development of a series of ‘environmental opportunity sites’, which have been identified to have the potential to support multi-functional benefits covering habitat and improved biodiversity, minimising flood risk and reducing carbon emissions / improving carbon storage.

Figure 11: Environmental Opportunity Areas



Source: BwD Local Plan 2023; DM 14 – Environmental Opportunity Areas

Those areas identified specifically for tree and woodland planting are shown in green. Other opportunities for tree planting may be available on the other EOA sites (including biodiversity/habitat improvements (pink) and minimising flood risk (blue)).

It is anticipated that the EOAs will feed into the national network of nature recovery networks – these are to be developed locally through a Lancashire-wide Local Nature Recovery Strategy (LNRS), from 2023.

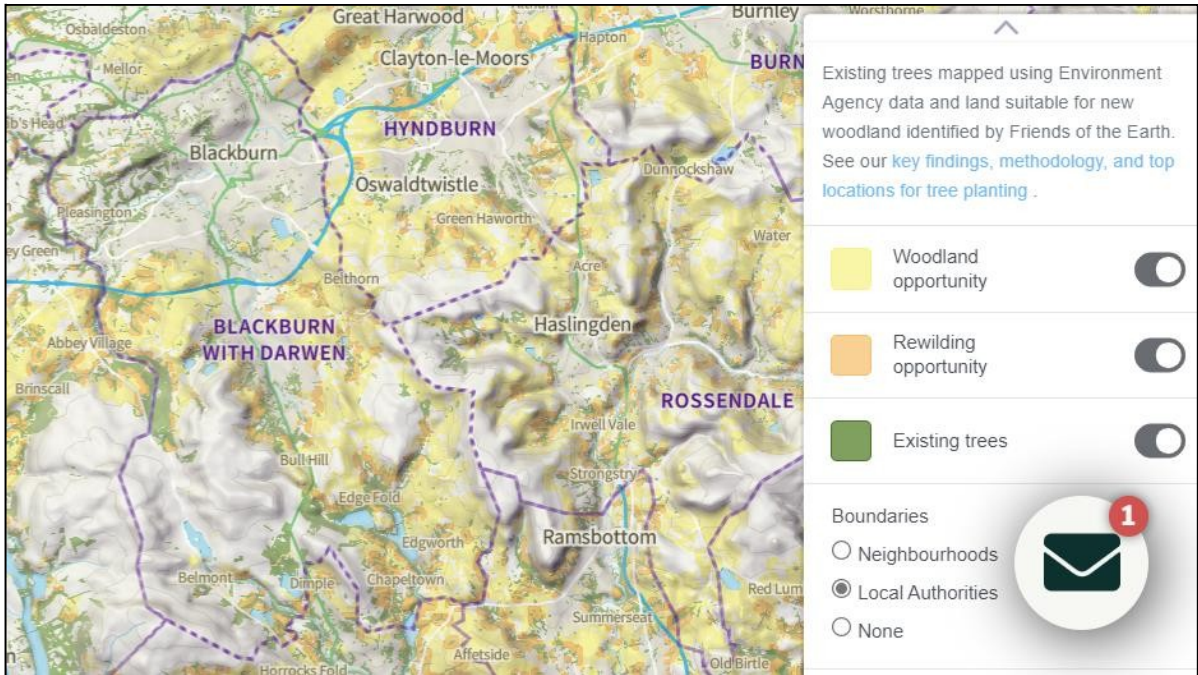
### **Additional Opportunity Mapping**

Friends of the Earth (FoE) and Terra Sulis have used mapping to identify existing tree cover and draw up an ‘opportunity map’ of areas in England that may be suitable for creating woodlands. Figure 12 is taken from their online mapping, and shows existing tree cover in green, opportunity areas for new woodland in yellow, and opportunity areas for re-wilding in orange. Data is also available by LSOA. Further information can be found direct on the [FoE website](#).

The FoE data indicates the existing tree canopy cover across the Borough is 11.4% (lower than other data on Canopy Cover and the Council’s own estimates, see above). It marks the tree cover for the borough in the bottom third of predominately urban local authorities, and states 33% of neighbourhoods are in the most 10% deprived areas nationally. However, it also identifies woodland planting opportunities for 3,051 hectares (22.6%) of which 877 hectares could be re-wilding. Moorlands have largely been excluded from the area of potential, which is mainly the agricultural parts of the borough. Inevitably some housing allocations have been picked up within the opportunity sites which would need to be removed through any project development mapping. The mapping doesn’t identify the potential for new trees in urban areas - which would highlight significantly more opportunities to grow trees.

FoE emphasise that to assess the suitability of sites for woodland creation, it is vital to undertake an ecological survey at a local level, and the mapping data should be supplemented with local datasets, including local (district) wildlife sites (DWSs), county wildlife sites (BHSs) and LERN data.

Figure 12: Woodland Opportunity Areas

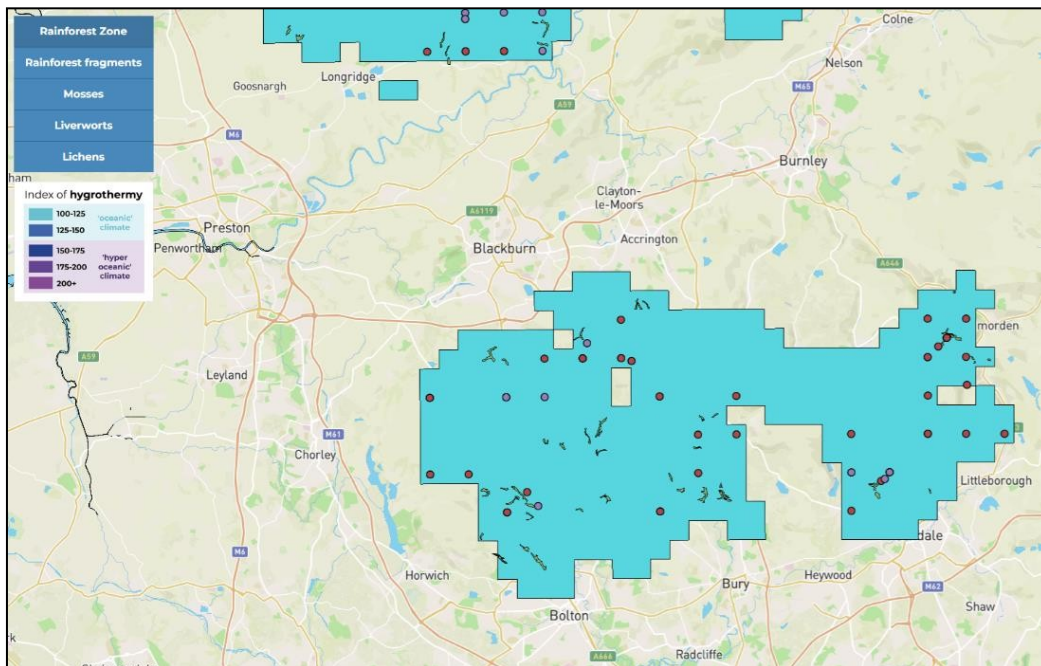


Source: [Friends of the Earth / Terra Sulis](#)

### Temperate Woodlands

FoE and Terra Sulis Research CCI have also mapped areas of Britain that may be climatically suitable for temperate rainforests, and the distinction of species of mosses, lichens and liverworts that are indicative of rainforest. [Temperate rainforests](#) are, put simply, very damp woodlands – so damp that plants grow on other plants. Mapping has identified those areas that could be suitable for temperate rainforests – and this includes the peatlands to the south of the borough.

Figure 13: Temperate Rainforest Opportunities



Source: [FoE / Terra Sulis](#)

## Recent Tree Planting

In 2021/22 the Council, with the help of residents, community groups, schools and local businesses, planted over 7,000 trees in local green spaces and school grounds. Micro- woodlands of native trees and mini apple orchards were created using grants from the Local Authority Treescapes Fund and Trees for Cities. The Council's planting was part of a wider programme of tree planting across Pennine Lancashire that involved 5 local authorities and the Ribble Rivers Trust. The scheme was written up as a case study by the Forestry Commission, which you can read [here](#).

Another 10,000 native trees, including oak, rowan, birch and Scots pine, were planted the following season to create micro-woodlands across another 18 sites in and around Blackburn with Darwen.

Sites were selected following assessment against existing use, biodiversity value, planning policy, and proximity to potential users of the new woodland.

These trees have been planted to increase the tree canopy across the Borough, to enhance biodiversity, improve local amenity and, in the longer term, capture carbon to help the Borough meet its objective of being carbon neutral by 2030.

## Summary of Data

Through this evidence, we can determine:

- Planting opportunities should look to increase the canopy cover of all wards and the borough overall.
- When considering where new trees should be planted, there should be opportunities to target planting to deprived areas to help address these environmental inequalities. This should, however, acknowledge the constraints of planting trees in pre-existing built-up areas.
- As access to 'greenery' is proven to enhance health and wellbeing, there should be opportunities to expand tree coverage and/or access to green infrastructure so that more of the borough's population can benefit from trees.
- New planting should take account of opportunities to create and enhance ecological networks, supporting the movement of species.
- New tree planting sites should be identified with reference to the EOAs, to help deliver multi-functional benefits, and link to wider environmental strategies. Planting sites should also be identified in conjunction with the LNRS.

- New tree planting also needs to be considered in conjunction with ecological data, including the commissioning of any new surveys, so that the most appropriate sites are selected, that can both protect and enhance habitats.
- A multiple interlay of data, and expertise, will be needed to help inform our new planting sites.

## 8. Our Vision & Objectives

This TAWS plays a key role in setting out the vision for a greener borough and to support the objectives of the Council's Corporate Plan, Climate Emergency Action Plan, and Local Plan. It sets the overall approach for tree management and new planting in the borough. The strategy is led by our Vision of how we want the treescape of our borough to be in the future. The Vision is informed by the evidence, challenges, threats and opportunities presented in this document.

### Our Vision

By 2030, we will have planted 30,000 new trees and created new woodlands to help increase the future canopy cover of the Borough, to replace diseased trees and to improve the storage of carbon, using the principle of 'right tree, right place, right pit'. Proactive surveying and tree management will have established a clear picture of our tree stock, and we will be working to minimise the number of trees lost to disease and to anticipate future threats to our stock. We will be responding to the climate emergency by using the multi-functional benefits of trees to mitigate climate risks and provide improved resilience, whilst also conserving and strengthening our biodiversity. We will have taken advantage of available funding and seized opportunities to improve awareness, education and engagement with trees and woodland within our communities. This will move us closer to our ambition of a greener place for all our residents to live, with enhanced opportunities to improve health and wellbeing.

### 8.1. Objectives

To work towards our vision, we have identified a series of objectives (statements to achieve the goals). How well we achieve our objectives can then be measured using a series of actions.

A high-level action plan accompanies this strategy, which we intend to develop through more detailed actions in the future. At present, significant areas of work are subject to ongoing work, including the development of a Local Nature Recovery Strategy, the establishment of a Woodland Creation Acceleration Team with partners at Lancashire County Council, and the need to secure additional resources and funding to support our ambitions. Collaborative working, with partners and local communities, will form an essential part of our tree and woodland delivery.



The TAWS also recognises that the strategy needs to be supported by enhanced data collection to provide an up-to-date record of information about our trees and woodlands. Improved data will need to be collected to build up a baseline picture of the stock, age and condition of our current trees and woodlands, and to identify those trees that are threatened and most vulnerable to climate change, pests and diseases. We can then use the information to identify locations where replacement planting is needed, and new planting can best be located.

The action plan will be used to understand what actions are needed, and to measure our performance against the objectives. This will be reported at regular intervals.

### **Our Objectives:**

- Increase the coverage of trees, woodland and hedgerows across the borough, to address the Climate and Biodiversity Emergencies, strengthen green networks and corridors, protect areas of high landscape value and maximise multi-functional benefits.
- Ensure new urban planting covers a variety of locations including highways, residential areas, town centres and open spaces, with greatest focus on areas with existing low canopy coverage, air pollution, high levels of deprivation and ill health and limited access to green infrastructure.
- Protect and manage the existing stock of trees, woodland and hedgerows to ensure no unnecessary loss of trees, provide resilience to climate change and reduce air pollution.
- Preserve ancient woodlands, ancient and veteran trees and trees and woodland of significant cultural, historical or amenity value.
- Improve the resilience of the borough's tree stock to climate change and increase carbon capture by trees and woodland.
- Conserve and enhance biodiversity through new planting and improved management, and support natural regeneration where practicable.
- Contribute to the development and delivery of the Nature Recovery Network, Green Infrastructure and Natural Capital, optimising and targeting opportunities from Biodiversity Net Gain.
- To manage and reduce pests and diseases, including Ash dieback and future threats (particularly that arising from climate change).
- To continue to secure funding for tree planting through government and other funding streams.
- To continue to engage and work with partners, public and landowners, and volunteer groups.

- To engage with, encourage and support community involvement and reduce vandalism.
- To improve education and awareness of the importance of trees.
- To review and update the strategy and action plan.
- To ensure new development provides new trees and protects existing trees.

## 9. Stakeholders and Partnerships

Partnership working is crucial to meeting our objectives and vision, and there are a wide range of partners that we can work with in relation to our trees and woodlands.

### 9.1. Internal

We work closely with colleagues across the Council, including those in Highways, Growth and Development (Planning) and Environment.

### 9.2. Partner Councils

BwD Borough Council often work closely with Lancashire County Council (LCC) and Blackpool Borough Council, particularly in relation to the environment.

In 2022, the three Councils jointly received £300,000 from the Government's Woodland Creation Accelerator Fund (WCAF) to increase the capacity of specialist skills within local authorities enabling them in turn to accelerate the delivery of tree planting and woodland creation commitments. The Councils will work together, alongside other partners, to identify the most appropriate sites for planting, in both urban and rural areas.

Under the Environment Act 2021, the Council are also working with LCC and Blackpool Council to develop a Local Nature Recovery Strategy (LNRS) which will identify a network of sites across the county to support the restoration of nature.

Both the WCAF and LNRS work will be developed over the next (approximately) two years and will help inform planting sites, particularly in winter seasons 2023/24 and 2024/25. This TAWS will help guide direct interventions to the most appropriate areas.

The chosen sites will be reflected in future updates to this strategy and accompanying action plan.

### 9.3. Environmental Groups

We are also committed to working alongside environmental and ecological groups, such as Lancashire Wildlife Trust, Ribble Rivers Trust and Woodland Trust. This enables us to improve our woodlands and habitats by giving us opportunities to learn and explore partnership projects.

We will do this by engaging with groups at the earliest opportunities, sharing information and maintaining communications as projects or proposals progress. By sharing the results of study work, we will also be able to best identify the most appropriate opportunities and interventions and find solutions for their implementation.

For example, Lancashire Wildlife Trust has developed the [Witton Greenhouse Project](#). Based in Witton Park, the project has worked to transform unused Council-owned greenhouses to a hub for growing, learning and wellbeing for the community to enjoy. It been very successful and has also helped improve the surrounding woodlands and habitats. The Ribble Rivers Trust is undertaking, on behalf of the Council, a Natural Flood Management Study to advise on works to reduce flooding along the river Darwen. Solutions may include expanding and improving on natural capital, including tree planting to reduce flood risk.

#### 9.4. Private Landowners

The Council would encourage landowners to manage their trees responsibly, and to plant new trees on their land. Appendix B of this document provides some links to guidance on tree planting and maintenance that can be used as a starting point for private landowners.

In some cases, where significant areas of land are owned by large landowners, such as United Utilities, we will actively engage with landowners to understand their own aspirations for tree planting and maintenance and to identify any opportunities for connectivity. For example, where Council-owned land adjoins private owned land, there may be opportunities to provide new woodland across both ownerships by working together, where respective strategies align. Private landowners may also have land available to support the delivery of off-site net gain, although this will be subject to their own land brokering.

#### 9.5. Communities

Communities also have a key role to play in helping to support our trees and woodlands, whether by suggesting new planting sites, identifying veteran/ancient trees, spotting signs of disease or pests, getting involved in tree planting, reporting vandalism and respecting and using our green spaces.

We will improve our communication with communities to ensure they understand where tree planting will occur, addressing the why's, how's and when's, as well as providing clear management plans for the future. Improved signage and information boards at planting sites can also support community awareness and better understanding. Where possible, consultation with communities about where trees should be planted will be an important part of enabling the most appropriate sites to be identified, both on public and private land, as well as better ensuring the success of planting efforts.

We will encourage community members to volunteer for future tree planting, increasing their involvement, investment and ownership of their local areas, which should help to increase the protection and aid in the management of these trees. This may also extend to businesses in the borough that may wish to be involved in funding and/or planting programmes as part of commitments to environmental and social value.

The Blackburn with Darwen People's Jury on the Climate Change Crisis, held in late 2022, made 15 recommendations for climate action. Recommendation 3 concerned green spaces and tree planting. Projects developed from this recommendation will be guided by and, in turn inform, the TAWS as an iterative process.

## 10. Trees of Council Land (Management Plan)

The Council looks after approximately 54 square miles of land within the borough and is responsible for a considerable number of trees and woodlands growing in a wide range of locations including parks and woodlands, schools, care homes, housing areas and along our highways. Current work is reactive, focusing on residential/highway trees, and a contracted team are responsible for the implementation of a management plan that focuses on the safe removal of dead/dying Ash trees. The Council aspires to develop a Management Plan which is wider in scope, establishing how we will manage our different assets in relation to trees in a methodical way.

### **Council Database (Alloy)**

The Council have recently procured a Tree Management software called 'Alloy', which will be used to survey, map and record all the trees on Council owned land, providing detailed information including species, age and condition. Each tree will then have an inspection regime allocated to it depending on age and condition, with the system producing inspection schedules. At each inspection, any faults and diseases can be recorded and then monitored.

Alloy can also support Council decisions on strategic tree management, for example, through the identification of mature trees and planning succession planting, or the identification of genus and species diversity to identify which are overrepresented within the Borough. The former is vital in ensuring appropriate allocation of resources for planting to provide future replacements prior to felling. The latter is necessary to ensure that our tree stock is resilient to future pest and disease outbreaks and to mitigate the impacts of climate change.

Alloy can also be used to map and record areas of new planting.

## Tree Management Plan

Trees will be monitored and managed with a view to retaining them for as long as possible without compromising public safety. Management for retention includes canopy reduction and pollarding/re-pollarding. In some cases, valuable trees, e.g., ancient and veteran trees, are fenced in order to prevent public access where this may be dangerous, and/or ensure the continued health of the tree.

Council trees are surveyed, using Alloy, typically on a 3–5-year cycle, depending on their location. In some cases, trees will be inspected annually. Urgent and priority works noted during inspection are carried out as soon as practical.

## Tree Removal

Sometimes the risk becomes too great to retain a tree, and the decision is taken to fell it. Felling is a last resort after exploring other ways of addressing the risk. Where trees are felled, the locations are recorded for consideration of replacement tree planting in the following season.

## Tree Replacement

To offset the loss of trees in the boroughs open spaces and highways, the Council have been pro-active in replenishing trees. We work on a 3 to 1 replacement ratio when a tree is removed.



## Residential Areas and Property

The Council undertakes tree work principally to maintain the health and safety of the trees on land that it owns. We prune trees for health and safety reasons, to remove actionable nuisances, in order to clear the public highway, or where trees are causing foreseeable damage to property.

We do not cut back branches that block light, mobile or TV signals, drop leaves, flowers or fruit, or drip honeydew on cars.

Trees do present a potential liability and we understand that we have a duty of care to ensure all of our trees are kept in an acceptable condition and do not place property or the general public at a level of risk that would be deemed unreasonable.

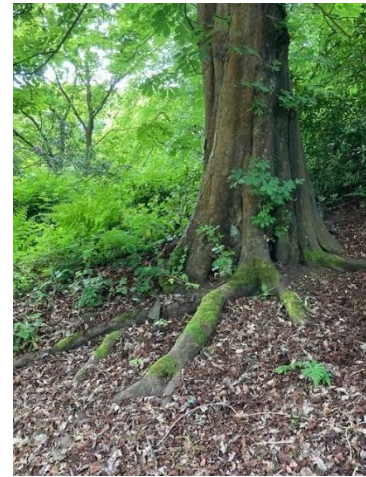
The Council will take a reasonable approach in situations when one of its trees is confirmed to be contributing to damage of property as part of its duty of care to neighbours. Insurance claims against Council-owned trees are investigated, and trees are neither pruned nor felled where there is insufficient evidence to warrant this.

## Tree Maintenance

The Council carries out all tree work to the current British Standards Institute's BS 3998: 2010 'Tree works and all tree planting and procurement to BS 8545: 2014 'Trees: from nursery to independence in the landscape'.

The Council will observe the law in respect of bird nesting and protected species and will not undertake work that risks disturbing breeding birds or other protected species.

Procedures relating to work on trees in Conservation Areas and trees subject to Tree Protection Orders are also observed. This relates both to internal Council trees and to work carried out for private and public sector clients on a commercial basis. Whilst works to Council owned and managed trees are exempt from requiring a Section 211 Notice (Notice of works to trees in a conservation area) to be submitted, we notify the Council's Planning Team for their information.



## Types of Work

Common work carried out includes:

- **Tree Risk Assessments** – assessing the risk of harm from trees, for example from poorly maintained trees and falling branches.
- **Coppicing** – trees are regularly cut close to the ground so that they regrow from the base of the stump to create dense multi-stemmed trees.
- **Crown Lifting** – the removal of the lower branches of the tree to increase the space between the ground and the other branches; allows light to reach the ground.
- **Crown Reduction** – the removal of branches in the tree crown to reduce the crown size or height of the tree; can improve the amount of light filtering to the ground.
- **Crown Thinning** – the removal of a number of secondary branches to produce a balanced (thinner) crown.
- **Pollarding** - the regular cutting of upper branches to encourage regrowth at the top of the tree; this opens up the canopy to increase light levels and benefit ground flora.
- **Thinning** – the removal of some trees or parts of trees within woodland, allowing a more diverse woodland structure.
- **Felling/Removal** - cutting down a tree.

## Damage, Vandalism and Anti-social Behaviour

Woodland design can be used to reduce perceptions of risk and reduce actual levels of anti-social behaviour and crime. Well-used and well-managed woodlands near to where people live can provide inclusive access and tend to attract less anti-social behaviour than unmanaged woodlands. Planting trees in areas with natural surveillance can also help to minimise vandalism. Other solutions include landscaping (accompanying planting with thorny plants), encouraging the mixed use of an area, supporting appropriate community ownership and use, and surfacing (gravel surfaces can provide acoustic signals of someone approaching).

## Highways

Trees form significant parts of the landscape along various arterial roads running into and out of the centres of Blackburn and Darwen. The Highways tree stock is an important asset and the Council's Highways Department also recognise them as key assets as part of their highway's maintenance strategies. The highway offers significant tree planting opportunities both for replacements and new planting, subject to underground and aboveground services and visibility constraints.

When trees are felled on the public highway, under the instruction of the Council's Highways team, the tree pit is made safe but may be kept open, so that a new tree can be planted in the pit during the following planting season.

The Council expect third parties to observe the law in respect of interventions involving trees within the Borough. Highways inspectors have been advised to inform the Tree Officer of infringements. Violations are inspected, and penalties imposed, although the Council prefers a cooperative approach, and will work with utilities contractors to find a solution to works near trees.

Under Section 154 of the Highways Act 1980, where private trees are considered a threat to users of the public highway or public footpaths, the Council can require the owner to make the tree(s) safe. If trees and hedges are causing an obstruction to the highway the Council will issue a letter requesting works to be carried out to remove the obstruction within 14 days. If the works are not carried out in this time a formal notice will be issued giving a further 14 days to have the works carried out. If the works are still not carried out after this time legal proceedings may be instigated, which can result in the Council carrying out the work if it is not undertaken within the required period and recovering costs.

Blackburn with Darwen Borough Council has set the statutory heights of 5.5m for the carriageway (road) and 2.75m for the footways / footpath (pavements), i.e., tree branches must be maintained above these heights. If a tree is protected by a TPO or is situated in a Conservation Area, formal

approval is not required for pruning to achieve these heights. The Planning department, however, should be given prior notice of the intended works.

### **Street Trees**

Street trees have an important role in helping to define the character of many areas, enhancing the street scene and softening the hard urban environment as well as providing a barrier to noise and pollution.

National planning policy states that policies and decisions should ensure that new streets are tree-lined, opportunities are taken to incorporate trees elsewhere in the development, and that existing trees are retained wherever possible. This will be addressed through the planning system.

The Environment Act (2021) introduces a duty to consult for local highway authorities to give public opportunity to understand why a street tree is being felled and express any concerns.

### **Schools**

Whilst the Council may own education land, individual schools are responsible for the management of trees on their land and must allocate resources within their budget for this. Regular inspection and maintenance of trees by schools is of utmost importance given both the high target zones and that under an occupier's 'common duty of care', as defined by The Occupiers Liability Act 1957.

Within the Council Health & Safety Department's 'Property Management and Compliance Guide', schools are required to have their trees inspected by a competent person on a monthly basis to industry best practice. In addition, they are required to have a statutory inspection every 3-5 years (dependent on individual tree risk) by an approved contractor.

The Council's Education Department will encourage schools to carry out regular inspections to meet their duty of care to pupils and to comply with Health & Safety requirements.

Education officers will also encourage schools to carry out tree planting, for example to create or enhance shading and pollution filtration. As part of this, they will provide advice on available grant funding for tree planting, and how to encourage pupils to be involved in tree planting so that future generations appreciate the benefits tree provide. The advice will also make schools aware of other non-tree planting options available, e.g., hedges.

### **Staff Skills and Training**

Almost all tree maintenance on Council land is carried out by the Council's in-house teams of arborists, who are fully trained in all aspects of tree work, as well as first aid and working safely on the public



highway. Training is regularly refreshed with the relevant qualifications as appropriate – including updating arborists with legal requirements or good practice.

## 10.1. Management of Pests and Diseases

At present, we face a significant challenge from Ash Dieback disease (*Hymenoscyphus fraxineus*). We have ownership of thousands of Ash trees in the borough and could potentially face losing 80% of these stocks to the disease. Over fifteen types of [additional pests and disease](#) are also attacking our trees.

In the future, climate change will continue to threaten our trees and woodlands, increasing the risks from pests, diseases, drought, flooding, wildfire and long-term changes to growing conditions. We have a dedicated team in place to deal with these problems and put in place plans to offset these health and safety issues and losses, responding swiftly to these issues and outbreaks of pest and disease.

We will try to help our woodlands and trees adapt and enhance their resilience to stresses by reducing risks and encourage greater diversity. This includes ensuring new planting uses a diverse stock of native trees, that are resilient to a changing climate.

To tackle pests and diseases we will ensure working practices and management follow Government guidance and consider biosecurity when agreeing details of landscaping and maintenance on development sites. We will also continually review BwDBC purchasing and working practices to ensure the Council are working to good arboricultural practice to minimise the chance of introducing and/or spreading pests, diseases or invasive species within the Borough.

In specific relation to Ash dieback, we will monitor and work closely with the Tree Council to ensure that we use best practice throughout the process of making safe or removing any Ash trees suffering from Ash dieback using their [toolkit](#). We will remove infected trees before they become a health and safety issue and adopt a pro-active tree replacement strategy. The aim is to retain as many Ash trees as possible, where safe to do so.

Some further information can be found on the Councils [Tree Advice webpages](#), including details of how to make enquiries. The '[Consent](#)' page gives general advice about what do about obtaining, and the likelihood of receiving, various consents to work on trees.

## 11. Trees of Private Land

On private land, the management, maintenance and safety of trees is the responsibility of the landowner.

The Council would encourage landowners to manage their trees responsibly, and, where appropriate, to plant new trees on their land. Appendix B of this document provides a list of appropriate guidance on tree planting and maintenance that can be used as a starting point for private landowners.

As general advice:

- Contact the Council to check trees are not covered by a Tree Preservation Order (see below), planning constraints or are within a conservation area.
- Employ professional tree surgeons who are covered by public liability insurance (always ask for proof). Be cautious about unsolicited house callers or leaflet droppers.

### 11.1. Felling Licenses

There is an overarching policy for the sustainable management of forests and woodlands in England which provides a presumption against the permanent loss of woodland. The felling of growing trees is therefore a regulated activity and, although some exceptions do apply, will usually require permission from the Forestry Commission through a felling licence. Where trees have been felled illegally, a Restocking Notice or subsequent Enforcement Notice may be issued by the Forestry Commission, which compels the landowner to replant the trees. The Environment Act (2021) has introduced stronger penalties, clearer rules and better visibility of charges on the land. More information can be found from the [Forestry Commission](#).

### 11.2. Tree Preservation Orders / Conservation Areas

In some areas, trees (on public or private land) may be legally protected by either a Tree Preservation Order (TPO) or due to their location within a Conservation Area. TPOs can be made by the Council to protect a specific tree or woodland from deliberate damage and destruction, which can include felling, lopping, topping, uprooting or otherwise wilful damage. If a tree or woodland is protected by a TPO or is in a conservation area (an area designated to protect the special historic and architectural interest of a place), anyone wishing to carry out management work or remove the tree will need to get permission from the Council. If permission is not sought and given, the Council can prosecute within fines of between £2,500 and £20,000.

There are over 260 Tree Preservation Orders across the Borough and 15 designated Conservation Areas. The protection of significant trees within Conservation Areas will be expected in accordance with local planning policies. The Council has and will continue to retain, protect and seek replanting of trees through its powers under The Town and Country Planning Act 1990 and The Town and Country Planning (Tree Preservation) (England) Regulations 2012.

The Council has a number of designated historic parks (including Corporation Park, Queens Park, Sunnyhurst wood and Whitehall Park), all of which have particularly important trees and/or woodlands present. Other parks and open spaces also hold historic or cultural importance, characterised by important trees, and the Council will continue to protect and manage these trees.

The Council will continue to use its powers under The Town and Country Planning Act 1990 and The Town and Country Planning (Tree Preservation) (England) Regulations 2012 to secure replanting in Conservation Areas and where protected trees are felled, wherever possible and appropriate. Where replanting within a Conservation Area cannot be enforced by law, owners will be encouraged to replant in order to meet the objective of the Tree Strategy and will be offered advice if required.

The Council will investigate all reports of unauthorised works to protected trees and seek to bring prosecutions where they are in the public interest.

Further information on TPOs can be found on the [Council's TPO webpages](#). This also includes the ability to check the planning map for TPOs and conservation areas, to apply for a TPO and to apply for permission to work on protected trees.

## 12. Trees in New Development (The Planning System)

Planning ensures that the right development happens in the right place at the right time; identifying what development is needed and where, and what areas need to be protected or enhanced, with the aim to achieve 'sustainable' development. In doing so, planning must also take a pro-active approach to mitigating and adapting to climate change, and to conserving and enhancing the natural environment.

### National Legislation

Against a range of other social and economic challenges, the Government requires all Councils to plan strategically for the environment. The Government's '[25 Year Environment Plan](#)' (2018), and '[Environmental Improvement Plan](#)' (2023), set out their delivery intents to reverse environmental decline and address climate change. The Environment Act (2021) establishes mandatory requirements to improve biodiversity alongside opportunities to increase tree, woodland and hedgerow planting. Of particular relevance to this strategy are:

- Local Nature Recovery Strategies (LNRSs) - a new England-wide network of strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits; and
- Biodiversity Net Gain (BNG) - ensures developers contribute to the recovery of nature while developing land. It seeks to make sure that habitat for wildlife is in a better state

than before (the development) and will apply from November 2023 to most developments. BNG should be delivered on-site, but where this is not possible, may be delivered on-site. BNG should seize opportunities to tie in to LNRs (once those networks are established).

### **National Planning Policy Framework**

The [National Planning Policy Framework \(NPPF\)](#) sets out the government’s planning policies for England with one of its three overarching objectives to contribute to protecting and enhancing our natural environment and addressing climate change. In particular, trees should be used to mitigate climate change and contribute to the quality and character of urban environments by being integrated in developments (paragraph 131). It also guides that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient/veteran trees) should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists (para 180).

### **Blackburn with Darwen Local Plan Part 1 and Part 2**

The Blackburn with Darwen Local Plan sets out the Council’s planning policies for the borough. Relevant policies (to the TAWS) within the current [Local Plan Part 2](#) include:

- Policy 9: Development and the Environment
- Policy 40: Integrating Green Infrastructure and Ecological Networks within New Development

### **Blackburn with Darwen Local Plan 2021-2037**

A new Local Plan is in preparation, which the Council hope to adopt in 2024, at which point it will replace Part 1 and Part 2. Until its adoption, it carries limited weight as a material consideration.

Relevant policies (to the TAWS) within the emerging [Local Plan 2021-2037](#) include:

- CP5: Climate Change
- CP6: The Natural Environment
- DM14: Environmental Opportunity Areas
- DM15: Protection and Enhancement of Wildlife Habitats
- DM16: Green and Blue Infrastructure
- DM17: Trees and Woodland
- DM18: Public Open Space in New Developments
- DM19: Development of Open Spaces
- DM22: The Borough’s Landscapes
- DM27: Design in New Developments

Through local policy, the Council have identified some areas of land which may be able to support environmental strategies, including that relating to new tree, woodland and hedgerow planting. They include:

- **Environmental Opportunity Areas (EOAs) (DM14)** - have been identified as having the potential to enhance or create habitat, sequester (store) carbon, manage flood risk, recreation, heritage, accessibility and wellbeing. Interventions should be focused to these areas to maximise the 'multi-functional' benefits that can be provided.
- **District Wildlife Sites (DWSs) (DM15)** – are areas of local wildlife importance. The Council undertook a study in 2022 to update habitat data on these sites. The results of the survey will be used to inform areas suitable for interventions, for example, enhancing woodland or tree coverage. The data will also be used to protect other habitats from tree planting.
- **Green and Blue Infrastructure (GBI) (DM16)** - describes the network of multi- functional green and blue spaces (like parks, canals, wildlife sites, rivers, woodlands, grassland, sports fields, moorland, churchyards), which provide benefits to people and wildlife.
- **Public open space (DM18)** – green space in new development is vitally important, and the policy requires all new residential development to contribute to the provision of high-quality open and green space. Open space is also afforded protection through the plan - policy (DM19) resists development proposals that would result in the loss of designated open space unless certain conditions are met.

EOAs, DWSs and GBI may be used to provide compensatory habitat improvements through BNG and form key parts of the LNRS. Tree and Woodland planting therefore has a key role to play within environmental strategy and planning.

### Supplementary Planning Guidance

The Local Plan policies are also supported by additional Supplementary Planning Guidance / Documents (SPGs/SPDs) and this Tree and Woodland Strategy. Supplementary documents include the [Green Infrastructure and Ecological Networks SPD](#), and the forthcoming Natural Environment SPD and Climate Impact Framework SPD.

### Determination of Planning Applications

All new development in the borough must have due regard to national and local planning policies and they are material considerations in the determination of planning applications. Through the use of both national and local tree-related/environmental planning policies, the Council will continue to ensure that new developments:

- Provide street trees through new development.
- Retain and protect existing trees within development proposals.
- Promote tree cover.
- Avoid encroachment into root protection areas of trees.
- Replace any trees that are lost to development on a 3:1 basis.
- Provide developer contributions where replacement tree planting cannot be achieved on-site.
- Secure landscaping within new sites.
- Meet, and exceed, British Standards for maintenance and landscaping (BS4428:1989; code of practice for general landscape operations (excluding hard services).
- Protect new woodlands, and support proposals for new woodlands.
- Avoid impact on irreplaceable habitats (e.g., ancient woodland or veteran trees); and
- Provide 10% biodiversity net gain (mandatory from November 2023).

It is a validation requirement of a planning application that applicants/developers must submit an Arboricultural Impact Assessment (in accordance with BS5837) where there are existing trees within the application site boundary and must act upon its findings with regard to design layout. This can ensure valuable trees are retained and incorporated into the development accordingly.

The Council will actively use planning conditions to enforce requirements, monitor developments and take the necessary enforcement action against those who breach planning conditions.

### **Developer Contributions**

Financial contributions will sometimes be required from developers to make a development acceptable in planning terms. This may include where the expected levels of replacement tree planting cannot be made on site and so a financial contribution is requested to deliver the necessary tree planting off-site.

Contributions may also be received through off-site BNG compensation (in accordance with BNG guidance) or required for carbon off-setting.

### **Biodiversity Net Gain (BNG)**

BNG introduces a requirement for new development to create or enhance habitats as part of proposals. This may include tree or woodland planting. How much habitat exists, and how much needs to be provided, is calculated using a biodiversity metric, which also identifies the number of biodiversity units needed to achieve an uplift. The urban tree canopy is considered separately in the calculation metrics to the habitat it stands on – for example, if there are 5 trees within grassland, the

area of grassland and the 5 trees are recorded separately. The metric also distinguishes between habitats of higher and lower distinctiveness. Fewer biodiversity units will be generated where higher distinctiveness woodland is being proposed, due to the difficulty of creating new woodland from scratch and the inbuilt risk multipliers within the metric.

### **British Standards**

In accordance with local planning policies, all developers will be expected to meet, and are encouraged to exceed, British Standards for Trees:

- BS5837 Trees in relation to design, demolition and construction (2012); and
- BS3998 Tree work recommendations (2010)
- BS827:2012- Root Protection Zones- new development aims to exceed the protection zones recommended in the standard for ancient and veteran trees, and distance from ancient woodland (whether mapped or unmapped on AWI)

BS5837 details the steps that should be taken to ensure trees are appropriately and successfully retained when a development takes place.

## **13. New Tree and Woodland Planting Opportunities**

### **A Tree Legacy**

The Borough's current treescape is a legacy – planted by previous generations and left to us to enjoy. We want to make sure that we continue this legacy – planting trees now so that future generations can reap their benefits.

Since 2021, over 17,000 native trees have been planted to create micro-woodlands in schools and green spaces in and around Blackburn and Darwen. The total includes 200 standard trees and 50 apple trees. Community apple orchards have also been created in a number of locations.

Our current aim, to maintain this legacy, is to significantly increase tree planting on Council land to plant 30,000 trees by 2030, subject to achieving the necessary funding. Over time, as trees mature, this will increase the canopy cover of the borough.

It is important to ensure that the right trees are planted in the right places, and so we must take into account a variety of different considerations, including habitats, soils, tree types, tree size, aesthetic/environmental concerns, competing land use demands, ongoing care and maintenance requirements and susceptibility to pests and disease (etc.) Some of this involves working closely with our partners to establish tree planting numbers and locations.

## Types of Trees

Annual tree planting over the long-term (to 2050) will focus on the families, genera and species which are underrepresented in order to create a more diverse tree stock. The reasons for this are not only aesthetic; diversity provides protection against pests and diseases spreading through particular varieties of tree, as well as supporting a greater range of fauna. We will also select our stock to be resilient to climate change, including drought.



These are a relatively long-term investment, and there is no intention to fell trees to help achieve a greater mix. Replacement will therefore occur over time as trees deteriorate with age, as well as taking opportunities for mixed planting in new locations. The aim to improve diversity should not compromise the integrity of heritage assets such as historic parks and gardens or conservation areas.

The need to increase certain tree species and avoid planting of others to achieve diversity will also be considered when landscaping schemes for development sites are assessed. There will be an expectation that developers and their landscapers will have due regard to our diversity aim and that landscaping will be designed accordingly.

Native species should be planted in preference to non-native species where appropriate. Native trees generally support a greater number and diversity of wildlife than non-native trees; their association with wildlife having built up over a longer period. However, the inclusion of non-native species will also be appropriate to make the Borough more resistant to climate change and the impact of pests and diseases. When selecting non-native trees, the Council will focus on those that are beneficial to wildlife in its planting schemes and will expect developers to do the same. There will be instances where exotic, ornamental planting will be justified, for example in public parks, particularly historic parks and gardens, and in and around conservation areas to maintain their original character.



Tree stock should either be UK grown or sourced from the UK, from domestic nurseries. Schemes like the UKISG (UK and Ireland Sourced and Grown Assurance



Scheme) or Plant Healthy can help demonstrate the quality of stock to buyers and that trees have been raised from seed sourced and grown solely in the UK

and Ireland. Nurseries should retain their trees for a minimum of one year (a full growing season) within the UK before sale to ensure plant health and non-infection by foreign pests or disease.

When determining the right species to plant in any location, the Council will have due regard to the 'Right tree, Right Place' principle and will add 'the right tree pit' to that.

### **The Right Tree Pit**

The potential negative aspects of trees are acknowledged, such as shading solar panels and interrupting television signals, 'nuisance' from natural trees debris (e.g., leaves, branches, twigs, honeydew), roots blocking drains, direct and indirect damage to buildings and structures (walls, hard surfacing) and even temporary traffic disruptions for tree works adjacent to the highway. Tree debris is a natural consequence of having trees and cannot be eliminated, only managed appropriately to minimise hazards. New tree planting under the 'right tree, right place, right pit' principle aims to address the other issues to avoid future conflict thereby ensuring trees can achieve their optimum size and lifespan without the need for detrimental pruning. Developers will be expected to approach planting with these same principles in mind and private landowners will be encouraged to consider these potential conflicts over the lifespan of any tree prior to planting.

The Council recognises the importance of good quality tree pits in order for trees to not only survive, but to thrive and achieve their optimum size and life span for maximum environmental benefits. Tree pits will continue to be designed to meet the requirements of the location and species in order to provide a sufficient rooting environment and prevent damage to adjacent structures. As more creative locations for planting are identified, this will mean a greater cost per tree, hence, within the limitations of the annual budget, the number of trees in such locations will not be as great.

### **Urban and Semi-Urban Planting**

To help address inequalities across the borough, including that from climate injustice, we will make sure that a proportion of new planting is directed to the more deprived areas of the borough.

As levels of deprivation tend to be higher in the more densely populated and built-up, urban areas it can, by their nature, mean it is often harder to find available land for planting. However, the Council recognise that it is important to provide and improve accessibility to green infrastructure in these areas and so will strive to do so.

Tackling deprivation, and addressing wider inequalities, should also provide an important justification for funding bids for new planting programmes. The planting of food-producing trees, for example,

provides opportunities to improve the health and diet of our residents by addressing inequalities in access to healthy foods, supporting sustainable diets and contributing to mitigating climate change.

## Highways

New tree planting locations within the highway will take into account the location of highway furniture, e.g., signs, lampposts, bus stops, and to avoid future obstructions. In addition, it will be ensured that planting on Council land and on development sites will not obstruct sight line safety. Where trees are planted on private land close to the public highway, advice will be given to landowners / developers to install suitable root barriers to prevent future root damage to pavement and road surfaces in order to avoid trip hazards occurring. Please see the section on Tree Planting.

Similarly, when new highway furniture is installed, it will be ensured that the locations minimise the likely need to significantly prune or fell existing highway trees during their expected lifespan.

## Where We Won't Plant

We recognise the importance of supporting and enhancing a range of habitats across the borough. Habitat establishment should not be at the expense of an existing habitat of ecological importance. We won't plant trees or woodland that detrimentally affect other habitats, for example grassland. Nor will we plant on protected habitats such as peatland, unless there is justified evidence to do so, noting, in particular, that peatland is a major store of carbon (a 'carbon sink').

We also won't plant trees on sites that are allocated for development in the Local Plan, of which are affected by planning constraints. This is to ensure our housing/employment supply can be delivered and only the most appropriate sites are identified for planting. All potential planting sites must be checked by the Council's Strategic Planning Team.

### 13.1. Identifying Planting Sites

The Council will proactively identify locations for tree planting in order to have a bank of locations ready for each tree planting season. New planting sites will be identified through a variety of ways:

- **Databases / desk-top assessments etc:** The Council will initially undertake desk-top assessments to identify sites in their land ownership, which may be available for planting, and check them against planning and infrastructure constraints (for example, to make sure the site is not designated for development, or there are no physical constraints, like pylons or easement corridors that need to be safeguarded).
- **Alloy & Council Tree Surveys:** The Council will also undertake surveys of existing trees, to better understand stock, cover, distribution and identify gaps etc. As part of its wider

management strategy, suitable tree planting locations are also noted during surveys in order to build up a 'bank' of tree planting locations for consideration each planting season.

- **Local Nature Recovery Strategies:** A national approach to drive nature recovery, led by responsible authorities (LCC). It aims to take a strategic approach to create better connected habitats, and deliver multi-functional benefits, including work to increase woodland cover. It is expected that the LNRS covering the borough's area will be informed by existing site designations, like biological heritage sites, district wildlife sites and environmental opportunity areas.
- **Environmental Opportunity Areas:** Areas identified in the Local Plan as priority areas for well-designed mitigation schemes that can provide multi-functional benefits to improve habitats, carbon sequestration and water management. This may include benefits delivered through new tree planting.
- **District Wildlife Sites:** Areas identified, and designated in the Local Plan, as areas locally important for wildlife habitats. A recent survey of all the sites identified as opportunities to enhance existing habitats, which may include tree and woodland management or planting.
- **New development / Biodiversity Net Gain:** BNG provides opportunities for the Council to deliver tree/woodland planting on Council-owned land as part of off-site compensation measures. This is subject to the development of council strategies to support BNG delivery.
- **Partnership working (UU/LWT etc):** We will also work with external partners to try and identify planting sites within the borough, including sharing data from commissioned studies to identify priority areas.
- **Woodland Creation Acceleration Fund:** see below for further details.
- **Carbon Offsetting:** Compensating for carbon dioxide emissions by investing in schemes that make equivalent reductions of carbon dioxide in the atmosphere. Planting more trees can be an example of this as trees absorb carbon dioxide through photosynthesis therefore investment into planting in another place can be a way to offset emissions (payments to counteract emissions once they occur).
- **Carbon Insetting:** The same as offsetting, but in the local area rather than a scheme in another country, so keeping investment and carbon reduction local. Insetting may be part of a company's value chain, e.g., investing in energy efficiency measures in a supplier's premises, or delivery of Corporate Social Responsibility, e.g., planting trees to 'give back' to the area in which the company is located.

- **Other ‘opportunity’ mapping:** including that from groups such as Friends of the Earth/Terra Sulis (opportunity woodland, re-wilding woodland and temperate woodlands)
- **Social landlords:** The Council will engage with registered social landlords, such as Together Housing, to understand any capacity for tree planting on their privately owned sites, particularly to support increased planting in our urban areas.
- **Public suggestions:** Members of the public are welcome to suggest sites, whether communicated directly, via councillors or via the Tree officers, for the Council to consider. The Council will then assess their suitability against relevant constraints and land ownerships.

At present, we are still working to develop the LNRS, gathering evidence to inform interventions on DWS sites, liaising with partners, and still to undertake surveys of our current tree stock. Work on woodland creation (below) is also still to fully commence. For this reason, the strategy sets out the broad tools/routes that will be used to identify sites but does not yet specify exact sites. This will be set out in future updates.

### **Woodland Creation (Accelerator Fund)**

We are currently working with Lancashire County Council, Blackpool Council and other stakeholders, including Lancashire Wildlife Trust and the Ribble Rivers Trust, on a Woodland Creation Accelerator Fund programme to identify potential planting sites for new woodland across Lancashire and to raise the finance to plant no less than 170 hectares by March 2025.

To identify potential sites within Blackburn with Darwen the Council will work with the WCAF Woodland and Outreach Officers to:

- Identify potential sites.
- Assist with identifying and unblocking obstacles, such as absence of ecological data.
- Prepare high quality scheme designs and maintenance prescriptions.
- Prepare and submit grant applications.
- Liaise with stakeholders, including residents and businesses adjacent to planting sites.

This TAWS will help develop the emerging woodland creation strategy as it can be used to advise the WCAF team on the goals, expectations and standards of BwD Borough Council, as well as tying together relevant data from across the Council to recognise our past planting endeavours and tree stock and vision for the future. In return, the expertise of the WC team will help to identify tree planting targets/numbers and the most appropriate locations.

## Prioritising Planting Sites

Prioritisation will be given to sites that can deliver multi-functional benefits – for example, improving health opportunities, improving air quality, minimising flood risk, improving habitat and biodiversity, and storing carbon.

The Council will also seek to prioritise planting that can strengthen ecological networks and improve accessibility to green infrastructure. As above, we will prioritise some of our planting to the most deprived areas of the borough to help address enviro-social inequalities in those areas.

Priority will also be given to areas with low levels of existing canopy cover and to replace trees that need to be removed for Health & Safety reasons.

## Mapping

The Council will develop computer-based mapping to record i) priority and shortlisted areas for new tree and woodland planting; and ii), following planting, the number, species and location of planted trees.

The Council will explore making information public, on the Council website, to increase awareness of tree planting areas.

## Accessibility

The Woodland Access Standard, created by the Woodland Trust in 2004 and supported by the Forestry Commission, focuses on towns and cities and encourages that no person should live more than 500 metres away from at least one area of accessible woodland (no more than 2ha in size) and that there should also be at least one area of accessible woodland of no less than 20ha within 4 kilometres of people's homes<sup>7</sup>. The Government's Environmental Improvement Plan (2023) introduces a target for everyone in England to live within a 15-minute walk of woodland, wetland, parks and rivers.

In most cases, the Council will support public access to green spaces, trees and woodland areas to encourage everyone to enjoy and value them. However, in some cases the need to protect ecological value, for example sensitive ancient woodland, may take priority so to restrict public access.

Where public access is enabled, the Council will seek to ensure that accessibility is supported. This may include improving accessibility to areas of greenspace (encouraging walking and cycling), creating and maintaining accessible footpaths, providing signposting, managing vegetation and rubbish,

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<sup>7</sup> [Access and accessibility - Forest Research](#)

promoting safety/reducing the fear of threat and providing information. The use of informative boards, for example, can help explain tree species and the wildlife that depends on it.

### Ongoing Management

To safeguard our tree legacy, we need to make sure that new tree planting, particularly for woodlands, is appropriately managed and maintained; minimising tree loss and maximising the benefits the woodland can provide. Funding is often also conditional on suitable management plans being in effect and so it is vital that management plans are in place.



Currently, our woodland is in varying condition. For current, and new, woodland to be maintained we need individual management plans for each woodland site. These should detail the current condition of the woodland, identify the management issues, and then identify the management actions needed to address the issues so that those improvements can be implemented. This can include natural regeneration, removal of invasive species (e.g., Rhododendron, Himalayan balsam) and improved management of deadwood.

However, management plans take time and expertise to prepare, and Council resources are often tightly restricted due to funding constraints. If the Council are to deliver on the Climate Emergency Action Plan, with regard new tree planting, then consideration needs to be given to the allocation of additional resources to support their ongoing management to ensure they survive and thrive. The requirements will be developed as part of the Action Plan and means of resourcing them explored.

Further, under the NERC Act (2006) and Environment Act (2021), the Council have a strengthened duty to report on the actions they are taking to conserve and enhance biodiversity in their area. New tree and woodland, as a key habitat, will form part of these Biodiversity (Action) Reports and the Council must provide for, and report on, their ongoing management and/or enhancement as part of that legal duty.

Improved recording and mapping of the locations of planting will also help ensure their long-term success.

There are opportunities to develop community volunteer groups, for example 'Friends of' groups, who can help to take responsible ownership of new woodlands and planting, helping maintain and care for the sites and promoting further awareness within the local community. They can also promote community action on crime and anti-social behaviour, and act as opportunities to reduce cases of

social isolation by providing social networks. Volunteer groups are invaluable and may also open up additional streams of funding (specifically for communities).

## 14. Hedgerow Management

Hedgerows, particularly those planted with native species (e.g., hawthorn) are an important part of the cultural and historic landscape. They also provide habitat for wildlife, a source of pollination, aid pest control, provide shade, flood control, soil protection and reduce pollution. Hedgerows create 'corridors' for species to move within and around. Poor management or neglect can result in loss or substantially alter the condition of hedges and their value as wildlife habitats. The protection and enhancement of hedgerows is important.

### Hedgerow Protection

The protection of hedges falls under the Hedgerow Regulations 1997, which is administrated by the Council's Planning department. If hedges meeting set criteria are proposed for removal, a Hedgerow Removal Notice must be served to the Council. The Council then has 42 days to determine whether the hedge is an 'important' hedge, as defined by the Regulations and if so, whether they want to serve a Hedgerow Retention Notice, taking into account the exemptions that apply. A Hedgerow Retention Notice is permanent but can be withdrawn by the Council at any point. The Council cannot refuse permission to allow the hedgerow to be removed other than by serving a Notice. If a hedge is removed in contravention of the regulations the owner can face a fine of up to £1000 in a Magistrates' Court, an unlimited fine in the Crown Court and a requirement to replace the hedge. 'Important hedges' do not include any within or bordering a domestic garden, hence those fitting the criteria are limited within the borough.

### New Developments

From the point that BNG is introduced in January 2024, the value of existing hedgerows will be assessed as part of biodiversity net gain calculations. Where existing on a development site, developers will be required to deliver a 10% improvement on the biodiversity of linear hedgerows. This means any hedges removed will need to have compensation provided, above that which is lost. Developers are encouraged to provide hedgerows on site, and the benefits they bring (for example, hedges have greater wind resistance than fences).

### High Hedges / Enforcement

Under Part 8 of the Anti-Social Behaviour Act 2003 (which came into effect in 2005), people whose light is affected by neighbouring evergreen trees / hedges are able to make a formal complaint to the

Council if they are unable to resolve the matter themselves and if the trees/ hedges meet set criteria. Further information can be found on the [Council's High Hedges webpage](#).

### **Council-owned Hedges**

The Council will aim to maintain its evergreen hedges to ensure that they do not affect the reasonable enjoyment of neighbouring gardens and/or houses in relation to light.

## **15. Education & Engagement**

### **Local Communities/Volunteers**

The Council has a responsibility to ensure that we have an active community engagement process when delivering this strategy. This will mainly be through the encouragement of residents to get involved in tree planting where possible.

Engagement with the local community is crucial to keeping new trees safe and avoid vandalism. If communities understand why trees are being planted, they are more likely to respect them and allow them to grow. Further, by engaging communities, they can have the opportunity to get involved, whether it be by planting some trees or by assisting with maintenance. This can be addressed in the implementation plan/specific area management plans to ensure the community are involved at appropriate times.

Important groups to consider include the various 'Friends of...' park groups across the borough. These groups already manage the park areas that they are associated with to varying degrees, and so tree maintenance could be easily slotted into their roles. Their local knowledge of the area will be useful in finding the right tree, right place, right pit approach. Similar groups, including ad-hoc conservation volunteers and local residents, should also have the opportunity to discuss potential new tree planting projects.

Utilising these interested parties can also open up the avenue of Citizen Science (the involvement of public volunteers in research, usually to collect big data sets). By doing this, it would help support the management of trees after planting/during off season periods by training volunteers to survey land and look for signs of tree death, growth, disease and identify species. This may be less accurate, but could be a faster, more useful way of involving the community and filling in any data gaps. It therefore would maintain the public's involvement throughout the process and reduced demand for Council Officer resources to do these activities as regularly.



## Businesses

Engaging with businesses could also help open up new avenues for funding opportunities through investment, supporting the equipment and resources needed for planting or through supplying manual labour (volunteers) to help get the trees into the ground. This could again extend into Citizen Science work, adding another beneficial element to this engagement.

## Schools

Schools are an important stakeholder in tree and woodland engagement for numerous reasons. Primarily, many schools have suitable land to plant trees and can implement tree management actions as part of the curriculum. Schools are also often able to get funding for tree planting and woodland creation. They can also promote tree planting, volunteer opportunities and help to improve awareness of the value of trees through their own communication channels.

This has multifaceted benefits because with adequate education, planting and subsequent management done by schools/pupils they can help support more successful tree planting and reduce those resources needed from the Council. Planting and management works involving young people can also help to deter them from vandalising newly planted trees in the borough. Furthermore, trees planted now are going to benefit the younger generations as they get older, and so it is a logical action to try and include these younger people at the start of this process, to instil the value of trees at a young age. But the planting of the trees can also positively impact the young people now, as planting gets them outdoors and using their bodies, which has mental and physical wellbeing benefits.

There are many resources for schools to utilise when beginning their tree planting journey, and this is important as educating the children about the activity means it can be included into the wider curriculum, for example, for physical activity and educational purposes. One resource is the Council's ['Beginners Guide to Tree Planting'](#) which lays out the basic foundations for tree planting and maintenance. Programmes such as [Eco-Schools](#) may also be able to provide guidance and support for schools wishing to encourage young people to make positive environmental choices and impacts.

## Communication

The Council will use various methods to communicate and engage, including:

- Social media posts including updates, volunteer opportunities, educational posts (e.g., what trees should be planted where, things to look out for if you want to become a Citizen Scientist, types of tree diseases to look out for and report).
- Updates to the Council's website.
- 'The Shuttle' website (and magazine) posts/articles.

- Educational signage boards near larger areas of planting; and
- Utilising additional external channels that may be relevant (including utilising communication channels of schools, community groups, workplaces that take part in planting or are near to planting sites).

## 16. Funding & Finance

Whilst many aspects of tree management are part of the Council's responsibilities, additional work, such as new planting on Council-owned land, and increasing canopy cover, are often wholly reliant on external funding.

### Grants

Tree planting supports government objectives and so there is £675m being invested to support tree planting and woodland creation through the Nature for Climate Fund programme. This includes:

- The Local Authority Treescapes Fund – funding to restore tree cover in non-woodland areas which may have been impacted by issues such as disease, habitat degradation or ageing tree stock.
- Urban Tree Challenge Fund – provides 80% of published standard costs for the planting and establishment of trees in urban and peri-urban areas.
- Woodland Creation Accelerator Fund – provides financial support to increase the capacity of specialist skills within local authorities to accelerate the delivery of tree planting and woodland creation commitments, with the goal of enabling the planting of more trees in 2023/24 and 2024/25.

In 2021 the Council received a £15,000 share of a Local Authority Treescapes Fund allocation for East Lancashire with which it planted 6,700 trees with the help of volunteers. The Ribble Rivers Trust planted another 1,500 trees in the grounds of 12 schools in the Borough.

In 2022, £300,000 was secured from the Woodland Creation Accelerator Fund jointly between Lancashire County Council, Blackpool Borough Council and BwD Borough Council, supported by partners. This is for staff time and expert advice only. Funds to implement planting schemes will have to be raised separately.

The Council will continue to proactively seek funding from grants and other funding streams, working with partners as necessary. Bids will seek to enhance the co-benefits that tree planting can bring to the borough, such as enhancing habitats, helping to achieve a carbon neutral borough, providing recreational opportunities and improving health.

## **Creative Opportunities (Commemorative Planting, Business Funding)**

The Council are also considering alternative ways of generating funding for new tree planting. This may include:

- Commemorative planting (births, deaths, anniversaries etc) of trees as a long-lasting tribute that can be visited. In return for a small donation (charge), a tree is planted, helping fund and build up woodlands.
- Encouraging businesses to donate money to planting schemes, or 'sponsoring' woodlands as part of their commitments to greening and mitigating climate change.
- Exploring the use of crowdfunding to help communities with local tree planting, with the Council potentially providing some match funding where communities can raise a proportion of funds themselves.

Further suggestions are always invited.

## **Biodiversity Net Gain**

The Environment Act requires all new developments to deliver a 10% net gain in biodiversity, with a preference for on-site delivery. Where on-site cannot be delivered, developers can provide off-site net gains, most likely by purchasing 'biodiversity units', and registering the gains on a national register. Net gains can then be provided (and monitored) on an agreed site through this funding. Through the planning application process, the Council will ensure that new developments provide the necessary uplift. There may be opportunities for BNG to be delivered on council owned sites, such as District Wildlife Sites, which may include tree planting or improvement works.

## **Developer Contributions**

Developers can be required to make financial contributions to provide infrastructure to support development and mitigate the impact of development. This can include biodiversity until the Environment Act takes effect in November 2023, at which point BNG will remain the method of funding biodiversity improvements. Where developer contributions are secured, the Council will ensure trees are delivered as appropriate in conjunction with planning and environment teams.

## **Neighbourhood Areas**

Some funding sources are specifically for community groups and so beyond the reach of the Council. The Council therefore encourages neighbourhood associations and neighbours to work together to raise funding for tree planting in residential streets.

## Schools

Similarly, schools are encouraged to apply for school funding.

## 17. Implementation & Monitoring

This strategy guides tree and woodland provision until 2030.

The Action Plan (Appendix D) provides a series of actions that we will take to meet the objectives of this strategy. These actions may be deliverable in the short-term, for example commencing surveys of our tree stock; medium term, e.g., producing management plans; or long-term such as increasing the diversity of species over time. As the strategy is updated, actions may be refined, and their detail expanded - this may include the quantification of planting targets.

The Council will prepare annual updates to report on how the objectives are being achieved.

## 18. Appendices

### Appendix A: Glossary

Ash dieback: A disease caused by the fungus *Hymenoscyphus fraxineus* that affects ash trees, causing leaf loss, crown dieback, and ultimately tree death.

Biodiversity: The variety of living organisms in an ecosystem, including plants, animals, and microorganisms.

Biological heritage sites: Sites that make the most significant contribution to the biological diversity of Lancashire.

Biosecurity: Measures designed to prevent the spread of pests and diseases that can harm trees and ecosystems, such as quarantine and sanitation practices.

BwDBC: Blackburn with Darwen Borough Council.

Canopy cover: percentage of ground covered by the leaves and branches of trees in a particular area.

Climate adaptation: Strategies and practices designed to help our environment adapt to the changing climate already occurring. Trees and ecosystems can adapt to the changing climate in some capacity and can help reduce the impacts of these changes by slowing down the flow of water to the surface and providing shade which reduces local temperatures.

Climate change: The long-term alteration of global weather patterns due to human activities, including the burning of fossil fuels and deforestation.

Climate mitigation: Actions aimed at reducing the causes of climate change by reducing the amount of greenhouse gases in the atmosphere. Trees assist in this by absorbing carbon dioxide through photosynthesis.

Education on trees: Programs and initiatives designed to educate the public on the importance of trees and promote sustainable tree management practices.

Environmental: Relating to the natural world and the impact of human activities on ecosystems, including the impact of climate change and habitat destruction.

External funding: Financial support provided by organizations outside of the local government to support tree management and planting initiatives.

Meeting objectives: Achieving the goals and outcomes set out in the tree strategy plan through effective planning, management, and implementation of tree-related initiatives.

Objectives: Specific goals or outcomes that the tree strategy plan aims to achieve, such as increasing canopy cover or promoting biodiversity.

Pest and disease: Insects, fungi, and other organisms that can harm trees by causing disease or damaging the tree's structure and function.

SSSI sites: Sites of Special Scientific Interest, designated by the Natural England to protect those areas of land and water considered to best represent our natural heritage in terms of flora, fauna and geology.

Sustainability: The concept of meeting the needs of the present without compromising the ability of future generations to meet their own needs, including the need to maintain healthy ecosystems and biodiversity.

Wildlife habitats: Areas of land that provide shelter, food, and breeding sites for a variety of wildlife species.

## Appendix B: Additional Resources

Further information can be found at:

### Legislation

- [Natural Environment and Rural Communities Act 2006](#) (legislation.gov.uk)
- [Climate Change Act 2008](#) (as amended) (legislation.gov.uk)
- [Planning and Compulsory Purchase Act 2004](#) (legislation.gov.uk)
- [Environment Act 2021](#) (legislation.gov.uk)
- [The Hedgerow Regulations 1997](#) (legislation.gov.uk)

### National Strategies

- [Net Zero Strategy 2021](#) (gov.uk)
- [25 Year Environment Plan](#) (gov.uk)
- [Environmental Improvement Plan](#) (gov.uk 2023)

### National Guidance

- [England Trees Action Plan 2021 to 2024](#) (gov.uk)
- [A Trees and Woodland Strategy Toolkit for Local Authorities](#) (treecouncil.org.uk)
- [British Standards](#) (bsigroup.com)

## National Planning Policy & Guidance

- [National Planning Policy Framework](#) (gov.uk 2021)
- [Planning Practice Guidance](#) (gov.uk)
- [National Design Guidance](#) ([www.gov.uk](#))
- [Tree Preservation Orders Guidance](#) (gov.uk)
- [Green Infrastructure Framework](#) (Natural England, 2023)

## Council Strategy and Local Planning Policy

- [Council Corporate Plan \(2023-2027\)](#) (blackburn.gov.uk)
- [Climate Emergency Action Plan](#) (blackburn.gov.uk)
- Local Plan [Core Strategy \(Part 1\)](#) and [Part 2](#) (blackburn.gov.uk)
- [Local Plan 2021-2037](#) (blackburn.gov.uk)
- [Supplementary Planning Documents](#) (blackburn.gov.uk)
- [Health and Wellbeing Strategy \(2023-2038\)](#) (blackburn.gov.uk)
- [Eat Well, Move More Strategy](#) (blackburn.gov.uk)
- Influencing healthier and more sustainable dietary behaviours through food producing trees and hedges in the UK (*forthcoming*, blackburn.gov.uk)

## Pests and Diseases

- [Managing ash dieback in England](#) - GOV.UK
- [Ash Dieback \(\*Hymenoscyphus fraxineus\*\)](#) - Woodland Trust
- [Ash dieback \(\*Hymenoscyphus fraxineus\*\)](#) - Forest Research
- [Key tree pests and diseases](#) - Woodland Trust
- [Tree pests and diseases](#) - GOV.UK
- [Identify a tree pest or disease: overview](#) - GOV.UK
- [Cost of Ash dieback](#) (fera.co.uk)
- [Pests and Diseases](#) (trees.org.uk) [Pests and diseases](#) - Forest Research
- [How biosecurity can prevent the introduction and spread of tree pests and diseases](#) - GOV.UK
- [Why is biosecurity important to the health of our trees?](#) - Forestry Commission

- [New quarantine proposals to protect England's trees](#) - GOV.UK
- [Plant Health legislation for forestry](#) - GOV.UK (www.gov.uk)
- [BS3998:2010 Tree work - Recommendations](#) (westberks.gov.uk)
- [A brief guide to tree work terminology and definitions](#) (trees.org.uk)

### Advice for private landowners

- [Trees for landowners and farmers](#) (woodlandtrust.org.uk)
- [Trees and the law](#) (RHS.org.uk)
- [Felling licences](#) (gov.uk)

### Communities / Other

- [Report pests and diseases](#) (Forestresearch.gov.uk)
- [Help us to create more river woodland](#) (Woodland Trust)

### Additional data

- [Tree cover outside woodland in Great Britain](#) Forestry Commission, (2017)
- [Tree cover outside woodland in Great Britain](#) (Forest Research)
- [Priority Habitats Inventory](#) (Natural England)
- [Historic Parks and Gardens](#) (Historic England)
- [Vegetation Object Model](#) (Environment Agency)
- [Biological and Geological Heritage Sites](#) (Lancashire County Council, ArcGIS)



## Appendix C: Consultation Feedback

Consultee	Consultee Feedback	Council comments/changes to document
Ribble Rivers Trust	Planting target – increase canopy area in 3 years (by 2026 – if Dec 2026 then that is 2.5 planting seasons from now) by 1.5% if aiming for 19% from the estimated starting point of 17.5% (which seems high) which is 205.5ha -. In area targets – increase in canopy cover – differentiate figures between ‘Trees outside woodland’	We currently don’t have access to all this data. One aim of this strategy is to collate this sort of evidence to support more detailed targets.  Will be updated as the plan progresses.
	Differentiate between types of canopy cover in the figures/numbers i.e., all cover including woods outside of trees and woodland cover. Woodland cover, as opposed to canopy cover, in Lancashire est. 5.7% with national target 13% - no targets for general canopy cover.	We currently don’t have access to all this data. One aim of this strategy is to collate this sort of evidence to support more detailed targets.  Will be updated as the plan progresses.
	New development - BS 5827:2012 – referring specifically to Root Protection Zones – aim to exceed root protection zones recommended in the standard for ancient and veteran trees, and distance from ancient woodland (whether mapped or unmapped on the AWI)	This has been updated in the document.
	Assessing all trees on council land with safety surveys undertaken every 3 years – doesn’t specify what assessing means but generally trees are zoned into risk zones. Trees next to highways and property are more likely to cause injury or damage than those in the middle of an inaccessible woodland. There is a scale from most to least likely to cause risk, assessments should perhaps determine this and then set out surveys based on this. The tree officers at the council may already do this, but it doesn’t say this in the report – that I saw anyway.	This has been updated in the document. The survey process will include risk assessments.
	British Standards are a minimum requirement – should always aim to exceed.	This has been updated in the document.
	Ash Dieback – 2.25 retain ash. 7.35 says remove dead ash – make clear that the aim is to retain ash where possible	This has been updated in the document.



	<p>Ancient woodland – current AWI only accounts for Woodland of a certain size (2ha) – should be an aim, working with WT and NE to identify smaller ancient woodlands.</p>	<p>This has been updated to include smaller ancient woodlands in the action plan.</p>
	<p>Ancient trees – create/update an inventory of ancient and veteran trees – already the ATI (this is noted in the draft but not in relation to the council’s inventory – council to use this? This also documents notable, as well as ancient and veteran. Could also include succession planning for ancient and veteran trees. Succession is mentioned in the draft for mature trees but not specifically for ancient and veteran trees.</p>	<p>Work in progress. Included in action plan for consideration as the plan progresses.</p>
	<p>Types of woodland and rivers – not gone into any detail in the draft. What woodland types are present across the authority – no mention of commercial forestry vs amenity or for its intrinsic value. No mention of broadleaf woodland types e.g., NVC classifications or which types of woodland are more common across the authority and so which woodland types may be of national or local importance – and most important for management. Wet woodland is of particular importance to us this would be a target area for RRT and the connection between woodland and river corridors might be something to expand on in the strategy.</p>	<p>The strategy is currently a high-level collation of current data and will be added to as more nuanced data is collected. Will be updated as the plan progresses.</p>
	<p>Designations – brief mention of designations but no detail on designated sites (BHS, SSSIs etc.) or priority habitat (NE dataset) where trees are important and so where a focus on management should be.</p>	<p>This has been updated in the document.</p>
	<p>INNS (invasive non-native species) – is there a broader INNS plan? INNS are mentioned in the draft in terms of 10.34 ongoing management but is there a broader plan with assessment made of INNS across the authority?</p>	<p>There are no plans in terms of invasive trees as it is not an issue to a large extent. There are wider management plans for other invasive species e.g., Japanese knotweed which includes planned removals of the species and volunteer schemes with members of the community.</p>
	<p>Types of trees 10.5 onwards – differentiate types of trees between woodland creation and trees outside of woods etc. So, woodland should be predominantly native broadleaf – trees outside of woods (not wood pasture really) could be non-native. Mention of improving resilience of tree stock is made, however</p>	<p>Wider implications of the environment will be taken into consideration when future planting is planned.</p>



	<p>this should take into consideration how this may impact functionality of the woodland ecosystem with tree species that support our native invertebrates, fungus, birds, etc. species.</p>	Planting a range of trees, not just native trees.
	<p>Sourcing trees – trees should be from Plant Healthy or UKISG Nursery where possible, otherwise as stated in 10.9</p>	This has been updated in the document.
<b>David Thornber</b>	<p>Meet British Standards for maintenance and landscaping (BS5837)</p>	Multiple British Standards apply.
	<p>Is this the correct BS reference? Or should it be – BS 4428:1989, Code of practice for general landscape operations (excluding hard surfaces)</p>	BS5837 is correct reference.
	<p>Sec 9.10 Applicants/developers are encouraged – should be encouraged, read required. – Validation of a planning application where there are existing trees requires an AIA in most situations. You may wish to check with Gavin or Katie on validation requirements.</p>	Confirmed that an AIA is required.
	<p>Create/update an inventory of ancient and veteran trees and map their location, estimated age and condition. Submit findings to the Ancient Tree Inventory? Ancient Tree Inventory - Woodland Trust Add a record - Ancient Tree Inventory (woodlandtrust.org.uk)</p>	Already in action plan. Aim is to build up more data over time and capacity to add records to Tree Inventory. Will be updated as the plan progresses.
<b>Drainage engineer (BwD Council)</b>	<p>We are currently working with Ribble Rivers Trust, modelling potential opportunities for Natural Flood Management within the Borough. Within this, we are considering the potential for planting new trees, and the benefits this could have with respect to flood risk. Maybe you could include this in your Action Column for whichever section is most relevant. The project is due to be complete by the end of 2024.</p>	Added to action plan.
<b>Lancs Wildlife Trust</b>	<p>2.24 'Feral wild boar'. A natural component of our native woodland ecosystems, Wild Boar was hunted to extinction around 1600 CE. Its unqualified inclusion in this list is therefore a curious one.</p>	Species removed from list.



	<p>2.25 'One of the bigger challenges that the borough is currently working hard to defend against is Ash dieback(<i>Hymenoscyphus fraxineus</i>) which is estimated to cost British society £15 billion'. Is that per year?</p>	<p>Clarified in the document- £15 billion is total Ash dieback could cost the UK.  Source: <a href="#">The outbreak of Ash dieback is predicted to cost £15 billion in Britain (fera.co.uk)</a></p>
	<p>4.2 Is Darwen Tower not located in open blanket bog/moorland?</p>	<p>Clarified in document that Darwen Tower is part of a character open space that also has some trees.</p>
	<p>Action Plan: Increase overall canopy cover to 19% by 2026 and aim to ensure that all wards have at least 8% canopy cover by 2026.  Is this achievable or desirable in upland wards without compromising nationally important blanket bog habitat and its specialist wildlife?</p>	<p>It is an ambitious target and one which, as progress is made, will be monitored and reviewed to reflect the surrounding environment and protect natural habitats</p>
	<p>Action Plan: Undertake regular surveys of the borough's trees (every 3 years) and their condition.  Has additional capacity been identified to do this - or does this just refer to trees in the council's tenure? Will there be liaison with the Lancashire Biological Heritage Site Team at the county council, members of which will be undertaking survey work on BHS?</p>	<p>Has been included in the action plan. Surveys will be carried out by the Council's team, but liaison where appropriate will be carried out.</p>
	<p>Action plan: number of new TPOs made annually. This target, as written, may risk encouraging the indefinite making of TPOs for the sake of doing so, rather than for specific purpose.</p>	<p>TPOs, if necessary, will be encouraged, but not where they are not needed.</p>
	<p>Action plan: Plant species that are native and/or of high biodiversity value, particularly in semi-natural areas and consider enabling natural regeneration.</p>	<p>Included in the action plan. Tree species will be chosen to offer the best chance of survival.</p>
	<p>Action plan: X (nos or %) of totals to be planted and % of successful natural regeneration</p>	<p>Added to action plan. Will be explored as more data become available and the plan progresses.</p>

**Appendix D: Action Plan**

See separate document.

