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Submission	The Forest of Fingal, A Tree Strategy for Fingal
Body	Fingal PPN Climate Change, Environment and Water Linkage Group
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Introduction

We are writing to you on behalf of the Climate Change Water & Environment Linkage Groups which is part of the Fingal Public Participation Network (FPPN). This linkage group represents over 24 environmental groups affiliated to the FPPN. The FPPN was set up following The Local Government Reform Act 2014. The main role of PPNs is to facilitate participation and representation of communities in a fair, equitable and transparent manner. The primary purpose of the PPN is to enable its member groups to input into and have their voices heard within the formal decision, making structures of the local authorities and to this end we wish to make the following submissions on the Fingal Tree Strategy

Setting the Scene

We are very pleased to see the Fingal Tree Strategy has been reviewed and that strategy acknowledges the importance and benefit of trees from multiple perspectives. It acknowledges the environmental, human, ecological and economic value of our trees and we believe they are an important aspect in making Fingal a great place to live, work, visit and do business.

We acknowledge the importance of a Tree Strategy and Fingal's effort to increase the tree canopy and maintain and improve the quality of the trees which currently exist.

The strategy promotes best practice. One of the most cost effective way to increase tree cover in Fingal is likely to be planting very young saplings (whips). We appreciate this involves the need for secure locations which pose fewer risks to fragile plants, in specified urban settings, where public space has many stakeholders. We also recognise that afforestation projects require investment to provide necessary protective measures (fencing, signage personnel etc.) but investing part of the tree budget in this initiative, in line with community based management systems, will promote and ensure "*a tree population that not merely survives but thrives*" (p.12). We suggest a budget allocation and plans be included for sapling planting

The Tree Strategy Structure diagram presented in Section 1.14 is an excellent summary of how the different elements of the Strategy interlink and we support the 'quality over quantity' and 'right tree, right place' approach to tree planting schemes.

However we need further education to ensure that "the right tree in the right place" is more than tree size. There are many aspects to be considered when choosing which tree to plant. We suggest an additional policy be added regarding the education of citizens on trees and hedgerows. This should be included on the webpage (outlined in Action 4.1) and we suggest it includes the following information regarding tree planting:

Temperature

Hardiness zone is an indication of your average annual minimum temperature and will help you in determining what species of trees, and plants will survive in your area. Hardiness zone maps are available on line and the Tree Council of Ireland give a user-friendly guide of the 'right tree in the right place (https://www.treecouncil.ie/the-right-tree-in-the-right-place).

Species selection

Just because a tree will grow in your hardiness zone, doesn't mean that you should plant it there. It would be a good idea to plant a species of tree that is native to your area. These are trees that have successfully survived where you live for thousands of years.

For advice on Native Trees visit the tree council of Ireland (https://www.treecouncil.ie). There is also a Tree design Guide for Towns and Villages which offers guidance on the most suitable tree for specific locations (clarecoco.ie/services/planning/publications/tree-design-guide-for-towns-and-villages-in-co-clare-2017-28115.pdf).

Other environmental factors to consider

Soil Structure and moisture requirements

The soil that a tree is planted in is very important and often overlooked. You can contact your local county extension office to have an analysis completed. This will help identify any issues that you may want to be aware of prior to planting a tree.

The moisture requirements of tree are also an important consideration. Are you in an area that is experiencing drought? Is the planting site you are considering often wet for extended periods? These are important questions to ask yourself to make sure that you are selecting a tree that will be compatible with these environmental factors.

Pests/Disease

Some trees are more prone than others to diseases and pests. Native trees have better disease and pest resistance, but how a tree is planted and the site that it is planted in can affect its overall health. Trees that become diseased are often attacked by insects (pests). This is because the disease weakens the tree's defences, making it vulnerable to infestation by pests. Sometimes trees are cultivated to exploit specific traits. Sometimes you can find trees at your local nursery that are bred because they show a natural resistance to diseases or pests.

Tips to avoid utility lines

One of the most tragic things that can be done to your new tree is planting it too close to utility lines. If the wrong tree is placed too close to a power line, that tree will endure a lifetime of corrective pruning and will end up looking disfigured and become more prone to disease and structural issues.

Overhead lines

Here are some guidelines that are recommended for safe distances from overhead powerlines. Your utility company should have guidelines that they will share with you, but most seem to adhere to low, medium or tall classification for trees based on their mature height

Low zone (trees that will reach a mature height of 20ft or less) — plant 15 to 25 feet away from powerlines and 8 to 10 feet away from your home.

Medium zone (trees that will reach a mature height of 35 feet) — plant 25 to 50 feet away from powerlines and 12 to 15 feet away from your home.

Tall zone (trees that have a mature height of more than 35 feet) — plant at least 50 feet away from lines and 15-20 feet from your home.

What about underground lines?

The biggest risk to interfering with underground lines exists at the time of planting. Never assume that your underground utilities are buried deep enough that you will not disturb them by digging. Please make sure to contact your utility or call 811 prior to plant trees on your property.

Tree Roots

It is also important to keep in mind that the root of your tree will spread out along the ground in all directions at a distance that is close to the mature height of your tree. This is important because the root system could be damaged if the line needs to be repaired.

Hedgerows -The scope of the strategy includes hedgerows and therefore the extent, importance and historical aspect of hedgerows should be outlined more clearly in Section 1.1. Hedgerows are oasis of biodiversity in the Irish landscape, supporting a wide range of birds, pollinators and mammals, whilst also providing significant carbon storage. Hedgerows have a rich history and are a characteristic feature of North County Dublin. Towns within Fingal should reflect our heritage by retaining key hedgerows which act as wildlife corridors and replacing hedgerows with linear stands of key hedgerow tree species where appropriate.

Policy Suggestions

- **Policy 1 (p.16)** - should include a commitment to only carry out hedge cutting outside the bird nesting period.
- **Policy 3 (p.24)** - We request that the historical and heritage value of landmark trees be included in this policy.
- **Additional Policy Recommendation** - We recommend the inclusion of the All-Ireland Pollinator Plan in Section 1.24 as a key policy related to the Strategy. As the Strategy encompasses trees and associated plants, the Pollinator Plan provides excellent advice on how to improve the species richness of grasslands.
- **Additional Policy Recommendation** – We recommend an additional policy be included regarding "Education on Trees" to include the suggestions above.

Value of Trees

This section provides a comprehensive summary of the importance of trees and woodland for our wellbeing. A brief summary of the particular significance of hedgerows for biodiversity would be a welcome addition to this section.

We would welcome the inclusion of the historic and heritage value of trees. This would be a wonderful addition to our tourism strategy and our heritage plans/trails.

Extract for South Dublin County Council Tree management Strategy

> *"Trees are amongst the most important and significant features in the urban and rural landscape. They are a part of our history and culture and have been worshipped, celebrated and revered in myth and folklore. Some trees are remarkable for their age, size, scientific, ecological or botanical interest or are valued for their intrinsic beauty while trees associated with historic events or landmark trees can be special to local interest and affection. There are a number of trees within the administrative area of South Dublin, on both public and private land, which have helped shape the County's cultural landscape and character. The Council intends to document a list of significant trees and this information will be used to promote broader community awareness and appreciation for trees and their protection in their contextual landscapes "(p.17).*

There is no reference in the strategy to the value of trees and tree cover in schools and public playgrounds. Trees provide shade and cooling tree covers in these places whilst providing protection from the sun's ultraviolet-B radiation. This in turn reduces the risk of skin cancer.

Although the health benefits of trees are acknowledged the benefit of shade and protection in these specific area types should be included with particular reference to providing cool areas for children to play and protect them from dangerous UV-B rays

Quality & Quantity of Fingal's Trees

Promote Responsible Tree Planting - It is welcomed that we acknowledge the serious lack of tree canopy in Fingal but it is concerning that much of the tree canopy is in private ownership. Although we cannot insist that citizens' increase the number of trees or woodland's on private land we need to provide incentives and support for citizens to promote tree planting whilst ensuring the tree owner takes responsibility for their care.

Please note Balbriggan typo on page 33. We are pleased to see that Balbriggan is noted as being in particular need of additional tree planting. Large open spaces in Moylaragh, Ashfield and Westbrook are potential areas for the establishment of hedgerows and mini-forests.

Masterplans - We suggest a masterplan for the establishment of hedge rows and mini-forests throughout Fingal.

Public Private Partnerships - We note the required increase in tree canopy may not be possible on public land alone we may need to investigate building public private partnerships.

The Sustainable Management of Trees in Fingal

Policy Suggestions

- **Policy 4** (p.38) - It is great to see the tree database being upgraded but we should use the opportunity of tree pruning to report any significant observations which may not be observed from a ground inspection. Contractors employed for tree pruning should have relevant qualifications in tree management.
- **Policy 7** (p.41) - This policy promotes a proactive approach to tree management in order to do this we need to introduce a clear timeline for tree pruning.

Research indicates that a 4 year pruning cycle for trees improves the health and longevity of trees. Fingal should endeavour to prune street trees every 4 years with mitigation measure for emergency works. There are many trees which have not been pruned for many years and a regular 4-year pruning cycle should eventually remove the maintenance currently required for lighting, footpaths, roads and building maintenance caused by trees.

Tree Pruning provides could also be used as an opportunity to produce mulch which could be made available to communities for community flower beds or areas suitable for mulching. The availability of mulch could be communicated through the text alert system to specific areas.

- **Policy 8** (p.44) - Replacing every tree when felled should also include an occasion to identify opportunities for additional planting. While staff are on site it would be a cost effective way to do additional planting.
- **Policy 9** (p.45) - We are pleased that no trees will be removed without justification and the reason documented and recorded but it should be communicated to the public. Tree felling and maintenance can be a very contentious subject among the general public. Notifications can be communicated though the following channels

  i. the current Fingal text alert system
  ii. the Fingal Public Participation Network (FPPN). They have a database which can email organisations in specific areas
  iii. erect simple portable signage bearing the Fingal logo a week before planned maintenance
  iv. introduce a dedicated email for reporting tree maintenance and inspections. The initial response should be automated providing information on when you will and will not inspect trees as set out on p.46. The extension of the www.alerts.fingal.ie service to cover tree maintenance would simply be expanding an existing service.

These measures have a twofold effect as it enables citizens identify legitimate tree felling/management and facilitate more accurate reporting of illegal pruning or felling.

- **Policy 11** (p.57) - the language in this policy is not strong enough, possibly amend to Fingal will actively pursue illegal tree removal

Tree Protection Orders 4.8 (p.49) – the number of TPO's is relatively low in comparison to the number of trees we have and vitally important for the protection of our landmark trees.

We suggest that Fingal in addition to TPOs compile a register of Landmark Trees (not just protected trees), to include trees which are of

- ➢ outstanding aesthetic significance e.g. height, trunk circumference, canopy spread, age
- ➢ trees commemorating or having associations with an important historic event
- ➢ trees which grow in unique locations or contexts thus providing a contribution to the landscape,
- ➢ important landmarks and trees which form part of an historic garden or park,
- ➢ any stand or avenue of trees which is significant,
- ➢ any significant community of trees.

This would be invaluable in the drive to increase tourism in Fingal and would raise awareness to the wider public of the heritage and historical value of our trees and provide exciting and interesting heritage tree trails.

These tree trails are currently operating successfully in St. Anne's Park and are effective from both a tree awareness and educational perspective.

Trees and Development – Fingal has experienced a large growth in population and with that population comes an extensive increase in development. We have lost a significant amount of tree canopy, particularly. older, more mature trees in the rush to build houses. Many tree strategies both in Ireland and abroad have entire sections devoted to trees and Development Sites.

Planning applications for developments often impose conditions for tree planting, bonds for tree protection etc. This is very important but there can be a lack of enforcement on these conditions and little or no communication between departments.

We recommend that the Planning Department notify the Parks Department (specifically the area dealing with trees & hedgerows) of any conditions regarding trees and that there is a joint effort to ensure the conditions imposed for grant of permission are met. Replacement or additional trees should be highlighted in the database as awaiting planting and added permanently to the database when planted.

All trees on proposed public open space which could potentially be damaged during development must be protected and if relocation is required the cost of both protection and relocation or replacement must be paid by the developer.

Although utility companies have rights regarding access to their utility boxes etc. we must ensure that they are aware of our Tree Strategy. They must implement protective mitigation measures during works and replace any trees damaged during maintenance.

Moving Forward

Objective 1 Responsible, Efficient & Coherent Approach to Tree Management

We would suggest a more specific time schedule than "proactive cyclical tree pruning". Research indicates that when trees are pruned on a four-year cycle this significantly improves tree health and structure. Though it may be difficult to carry this out initially it would be cost effective in the long term. We suggest the following:

- The council implement to prune street trees based on a four-year tree management programme.
- Include formative pruning
- Allocate time in the pruning schedule to include mitigation measures for emergency pruning.
- Use pruning as an opportunity to report any hazardous trees.

Objective 2: Tree Protection & Retention

We are delighted to see the Tree Preservation orders being reviewed but we would also like that:

- Fingal compile a register of Landmark Trees not just protected trees.
- Stop the use of chemical weed killers around the base of trees and replace with mulch with immediate effect

Objective 3: Tree Planting and Establishment Initiatives to Ensure a Sustainable Tree Population

We suggest Fingal

- Promote the planting of native trees.
- Ensure the trees planted are species which are resilient and can survive with the current challenges of climate change e.g. drought
- Use roadside verges for wildflower and biodiverse planting schemes to complement street tree planting
- Promote localised arboretum collections of trees in towns and villages for both aesthetic and education benefits

Objective 4: Community Involvement, Public Engagement & Awareness

We would like to see a more definitive two way communication system outlined. We suggest:

- Fingal introduce a dedicated tree email address.
- Posting of tree planting/maintenance schedules on the Fingal website.
- Using the current Fingal text/email alert system for information regarding tree maintenance felling etc.
- Advise communities of the availability of Mulch in their area.
- Send information through the FPPN system
- Ensure the dedicated webpage provides information for the community/citizens who need information on the requirements for planting the right tree in the right place.

The National Biodiversity Data Centre website www.biodiversityireland.ie is an excellent resource for biodiversity information and would be a useful addition to Appendix IV. The Forest of Fingal Tree Strategy should complement the Fingal Biodiversity Strategy and ensure that trees planting and under-canopy are harnessed to maximise the environmental, biodiversity, aesthetic benefits as well as strengthening community engagement and education.

In conclusion we welcome the Tree Strategy and request it be reviewed and a progress report published annually.

We believe the Fingal Development Plan 2023 should support land use planning that recognises the benefits of forestry, woodlands, allotments and community gardens in generating healthy urban communities.