



### **About the Trees and Design Action Group (TDAG)**

TDAG was founded in 2007 as a not for profit and apolitical collaborative forum to promote best practice in the protection, planning, planting and management of urban trees and was incorporated as a charitable trust in 2013.

This broad, cross-disciplinary group shares the collective vision that urban trees, and all the benefits they bring, can be secured for future generations through strong collaboration in the protection, planning, design, construction and management of our urban infrastructure and spaces.

TDAG has produced a series of good practice documents especially *Trees in the Townscape: A Guide for Decision Makers*; *Trees in Hard Landscapes: a guide for delivery* and is currently developing *Trees, Planning and Development: A guide for delivery* to complete a trio of documents providing a very broad understanding about the urban forest.

In addition, we have produced, in association with Dr Andrew Hirons at University Centre Myerscough with support from NERC, a *Tree Species Selection for Green Infrastructure: a guide for specifiers* and some short guidance documents *First Steps in Urban Air Quality*, *First Steps in Valuing Trees and Green Infrastructure* and *First Steps in Urban Heat*.

Currently TDAG is working on the following in line with the implementation of the England Trees Action Plan (ETAP):

- Technical drawings for integrating trees in highways to accompany the revised Manual for Streets with DLHUC, Forest Commission and the DfT.
- The development of a Tree and Woodland Strategy Toolkit with Defra to enable alignment with its own guidance document (Section Four of *Trees, Planning and Development*).
- With the NHBC on foundation design to better accommodate trees but also to reduce carbon and be more resilient to the impacts of climate change.

### **Overall comment on the consultation challenges and questions**

The overarching challenges that we all have to respond to are climate and ecological breakdown – as declared widely by local authorities, professional institutions et al.

In many of our responses there are cross-sector economic and financial considerations – getting our urban infrastructure right including adequate green space will, for example, contribute to better health and reduce costs for the NHS or integrating trees and SuDS for multiple benefits in both new developments and retrofitting can be less costly than engineered solutions...and so on.

Clearly the role of collaboration and cross-sector working has never been more important as many decisions need to extend beyond their own apparent 'red lines'.

Ref: Sir John Armitt <http://www.infrastructure-intelligence.com/article/sep-2020/collaboration-key-successful-future-says-sir-john-armitt>

We consider this a key response for several of the questions raised in this consultation of which we highlight the following:

**Question 4:**

*What interactions exist between addressing the Commission's nine challenges for the next Assessment and the government's target to halt biodiversity loss by 2030 and implement biodiversity net gain? Your response can cover any number of the Commission's challenges.*

**TDAG response:**

- There are several interconnecting actions that need to take place at the same time: Recognising the value of linear routes (rail, road etc) to provide biodiversity corridors (Challenge 9) and provision of wider linear routes where this can improve connectivity.
- Achieving biodiversity net gain (outcome of current Defra consultation)?

- Providing green bridges to avoid major wildlife barriers being created by new linear routes.

Ref: <https://greenworld.org.uk/article/bridges-future#:~:text=The%20Netherlands%20has%20an%20impressive,and%20the%20great%20crested%20newt>

- Better integration of NIC guidance with other relevant guidance such as Natural England's nature recovery network and strategies.

**Question 7:**

*What barriers exist that are preventing the widescale adoption and application of these new digital services and technologies to deliver better infrastructure services? And how might they be addressed? Your response can cover any number of the Commission's sectors outside digital (energy, water, flood resilience, waste, transport).*

**TDAG response:**

- It is important that the NIC integrates its work with the Defra land-use team and the DLHUC planning team on the need for a land-use framework and integrated digital mapping, so that multi-layered decisions can be made in the most relevant locations.
- Liaison with Digital Britain, National Geospatial Commission and partners such as Ordnance Survey is also vital.

**Question 13:**

*In what ways will current asset management practice need to improve to support better infrastructure resilience? Your response can cover any number of the Commission's sectors.*

**TDAG response:**

- We would like to express a concern about the maintenance of much of our present, basic infrastructure – roads, bridges, drainage and surface water management etc and would like to see this have priority.

Ref: RAEng <https://www.raeng.org.uk/publications/responses/independent-armitt-review-of-infrastructure>

- In cities there is a huge performance gap in the public realm through lack of basic infrastructure maintenance.
- We have to make a concerted effort to maintain and bring up to a reasonable standard what we have before we develop more!

**Challenge 6:** *Surface water management – the Commission will consider actions to maximise short-term opportunities and improve long term planning, funding and governance arrangements for surface water management, while protecting water from pollution from drainage. The Commission will carry out a separate call for evidence on this challenge, as the Commission will deliver this as a separate study and report to government by November 2022, in advance of its other recommendations.*

**TDAG comment:**

It is important that NIC works with Defra in the area of surface water management, to ensure its recommendations are aligned.

For example, the Design Review Group 3 is looking at the final part of the Flood and Water Management Act that wasn't enacted (Schedule 3), and so leading to a somewhat muddled and ineffective system for SuDS policy, design, integration and adoption.

The use of SuDS in all new developments must become a legal requirement, so that we avoid many of the problems in existing locations in the future and the retrofitting of SuDS (with trees where possible) must become the acceptable solution for surface water management given that engineered infrastructure systems are, in many cases, no longer adequate – principally in urban areas, but not exclusively.

**Question 16:**

*What evidence is there of the effectiveness in reducing congestion of different approaches to demand management used in cities around the world, including, but not limited to, congestion charging, and what are the different approaches used to build public consensus for such measures?*

**TDAG response:**

Demand management may have some answers but, essentially, we must move away from private personal transport in cities, relieving congestion and enabling improved use of space, especially road space, for other vital uses. Many cities have achieved this and bold policy should be supported.

These include:

- Providing accessible green space for many benefits including access to nature for human physical and mental health and wellbeing. This will involve managing the various demands i.e., housing density and land use – it can be done with effective, adopted planning policies and appropriate investment in design.
- Increasing tree canopy cover to reduce the urban heat island effect as well as enhancing conditions for more walking and cycling.

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