

## EXECUTIVE

Date: Tuesday 5 March 2024

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Manager on 01392 265477.

Entry to the Civic Centre can be gained through the rear entrance, located at the back of the Customer Service Centre, Paris Street.

### *Membership -*

Councillors Bialyk (Chair), Wright (Deputy Chair), Denning, Foale, Morse, Parkhouse, Pearce, Williams, R and Wood

## Agenda

### Part I: Items suggested for discussion with the press and public present

#### 1 Apologies

To receive apologies for absence from Committee members.

#### 2 Minutes

To approve and sign the minutes of the meeting held on 6 February 2024.

(Pages 3 -  
12)

#### 3 Declarations of Interest

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item. Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

#### 4 Local Government (Access to Information) Act 1985 - Exclusion of Press and Public

It is considered that the Committee would be unlikely to exclude the press and public during consideration of any of the items on the agenda, but if it should wish

to do so, the following resolution should be passed:-

**RECOMMENDED** that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part 1, Schedule 12A of the Act

## 5 **Questions from the Public Under Standing order No. 19**

To receive questions relating to items on the Agenda from members of the public and responses thereto.

Details of questions should be notified to the Democratic Services Manager by 10.00am at least three working days prior to the meeting. Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

## 6 **Review of the Corporate Risk Register**

To consider the report of the Director Finance.

(Pages 13  
- 26)

## 7 **Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD): Adoption**

To consider the report of the Director of City Development.

(Pages 27  
- 102)

## 8 **Tree and Woodland Strategy 2023-33**

To consider the report of the Director Net Zero Exeter & City Management.

(Pages  
103 - 214)

## **Date of Next Meeting**

The next scheduled meeting of the Executive will be held on **Tuesday 9 April 2024** at 5.30 pm in the Civic Centre.

**A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.**

Find out more about Exeter City Council services by looking at our web site <http://www.exeter.gov.uk>. This will give you the dates of all future Committee meetings and tell you how you can ask a question at a Scrutiny Committee meeting. Alternatively, contact the Democratic Services Officer (Committees) on (01392) 265115 for further information.

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## EXECUTIVE

Tuesday 6 February 2024

Present:

Councillor Bialyk (Chair)

Councillors Wright, Denning, Morse, Parkhouse, Pearce, Williams, R and Wood

Councillor Jobson (as an opposition group Leader);

Councillor Moore (as an opposition group Leader); and

Councillor M. Mitchell (as an opposition group Leader)

Apologies:

Councillor Foale

Also present:

Chief Executive, Director Corporate Services, Director Finance, Assistant Service Lead – Local Plan, Organisational Transformation Programme Lead and Democratic Services Manager

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### MINUTES

The minutes of the meetings held on 9 and 22 January 2024, were taken as read, approved and signed by the Chair as a correct record.

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### DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

22

### QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

23

### ANNUAL REVIEW OF ONE EXETER PROGRAMME

The Executive received the annual review report of the One Exeter programme and the planned programme of work over the next 12 months in supporting the delivery of a well-run Council. Since the previous report, work had also incorporated organisational improvements to deliver on Member's priorities and respond to recommendations put forward by the LGA as part of their Decision Making and Accountability review.

Particular reference was made to:-

- the various workstreams outlined in the report had been assigned to a specific Strategic Director;
- a new values and behaviours framework had been introduced through collaboration with staff and that reference had been made in the corporate plan;
- work on developing a more collaborative working culture had been undertaken, which the creation of the Extended Leadership Team, consisting of the Strategic Management Board (SMB) and Operational Management Board (OMB) to address cross cutting issues;
- work had been undertaken to identify similar areas of work being conducted across the organisation and whether there were opportunities to do this work differently;

- all staff were invited to attend a meeting with SMB to talk about priorities, values and behaviours, which had been well received;
- Microsoft 365 had been rolled out to staff and work was underway to provide the system for Members; and
- thanks were made to SMB and OMB for their work in bringing the One Exeter initiative forward.

Councillor Moore, as an opposition group leader enquired on the strategic risk relating to the outcome of the change process and the impact on quality of service. She also enquired on the review trigger point to ensure the risk of cuts was reduced.

Councillor M. Mitchell, as an opposition group leader suggested a Members Briefing would be beneficial later in the year and enquired on how the customer and Member relationship fit in.

Councillor Jobson, as an opposition group leader welcomed the report and supported the suggestion of holding a Member Briefing.

Executive Members made the following points:-

- the report and the extensive work undertaken was welcomed,
- the LGA summary of improvements were noted;
- work on how Executive Members collaborated with Directors was underway and would be rolled out at the proper time;
- how were the staff briefings received and what was addressed? and
- how was the issue of administrative support being addressed?

The Chief Executive in responding to questions and points raised by Members advised:-

- the all-staff meetings, were incredibly positive and staff appreciated seeing all of SMB together in one place to engage with them. The questions and responses put to SMB would be made available to Members; and
- work on automation and digitization was being addressed to reduce the level of admin and the cross cutting work would also help to provide understanding of what admin work was being undertaken.

The Leader advised that a Member Briefing would be provided going forward and the detail of the work would be provided.

**RECOMMENDED** that Council note the progress with the programme.

24

#### **GENERAL FUND / HRA ESTIMATES AND CAPITAL PROGRAMME 2024/25**

The Executive received the report on the General Fund revenue estimates for 2024/25 and also included the proposed Capital Programme for 2024/25 and future years, together with the proposals for the Housing Revenue Account for 2024/25.

Particular reference was made to the following:

- the Council had received an extra £140,000 in the local government final settlement which was not included within this budget;
- the Council tax referendum threshold had been confirmed as less than 3% or £5 for District Council's. For Exeter, the increase was 2.99% or £5.24;

- the new homes bonus had been confirmed at £485,000 and meant that the Council had tipped over £30 million of new homes bonus over the life of that funding;
- the budget for 2024/25 would be balanced, however, work was required to identify further reductions of £5.6 million over the next three years. There were current proposals covering £1.5 million, requiring £4.15 million to be identified;
- the council tax budget recommendation was an increase of £5.24 on a Band D Council tax, equating to £7.04 million of council tax;
- a 2.99% increase for Band D council tax would equate to £180.37;
- the General Fund Capital Programme being proposed for next year was £15 million with a significant carry forward expected, for which approval would be sought for in July 2024, with £168,000 set aside for new IT equipment; and
- the Section 25 statement highlighted that a significant amount of work had been undertaken to address the level of reserves for the general fund and the HRA. A risk assessment process was used to identify risks and why reserves were held.

Councillor Moore, as an opposition group leader enquired about the recommendation for a public consultation on the council budget.

Councillor M. Mitchell, as an opposition group leader expressed concern on the decreasing percentage of income from council tax and its impact in delivering statutory and discretionary services.

An Executive Member commended the report and advised that the Police and Crime Commissioners Panel had set a precept increase of £12.94.

The Director Finance in responding to questions and points raised by Members advised that a comprehensive consultation would be in place for next year.

**RECOMMENDED** that Council:-

- (1) approve the overall spending proposals in respect of its General Fund and HRA revenue budgets;
- (2) approve the General Fund and HRA Capital Programmes, subject to the identification of sufficient capital receipts to finance the new General Fund Capital bids in respect of IT and that the final decision be delegated to the Director Finance, in consultation with the Leader and Chief Executive.
- (3) in agreeing the recommendations, consider the Section 151 Officer budget assessment in 8.17 of the report.
- (4) approve setting the General Fund minimum Balance at £3.020 million for 2024/25 and the HRA minimum Balance at £3.525 million for 2024/25.
- (5) approve the Council Tax for each Band recommended to the Council as set out in section 8.19.3 subject to Devon County Council, OPCC Devon and Cornwall and the Devon and Somerset Fire Authority confirming their Band D levels, respectively.
- (6) approve the revised Council Tax levels submitted to Council on 20 February 2024, when the actual Council Tax amounts for Devon County Council, Devon and Cornwall Police and Crime Commissioner and the Devon and Somerset Fire Authority are set.

The Executive received the report which sought approval of the Capital Strategy 2024/25 and to ensure that all elected Members understood the longer-term policy objectives and the resulting Capital Strategy requirements, governance procedures and risk.

Particular reference was made to the change in accounting standards for leases, which were now classed as capital assets and that there was no financial impact to the Council.

Councillor Moore, as an opposition group leader enquired on the criteria and assessment for the review of capital assets.

The Director Finance in responding to a question raised by a Member, advised that there were no planned changes in the capital programme and that officer's assessed the conditions of assets.

**RECOMMENDED** that Council approve the Capital Strategy as set out in Appendix 1 of the report presented at the meeting.

26            **THE PRUDENTIAL CODE FOR CAPITAL FINANCE IN LOCAL AUTHORITIES  
(INCORPORATING THE ANNUAL STATEMENT OF MINIMUM REVENUE  
PROVISION)**

The Executive received the report on the proposed 2024/25 Prudential Indicators for capital finance for adoption by the Council and to set the annual statement of Minimum Revenue Provision (MRP), which would be incorporated within the Budget Book for approval at the full Council meeting in-line with statutory requirements.

Particular reference was made to the £1.905 million proposed MRP charge for next year and the total amount of overpayments at the end of the financial year was £0.7 million, which would be used in next year's budget to offset the MRP.

**RECOMMENDED** that Council approve the adoption of:-

- (1) the Prudential Indicators set out in Appendices A-C of the report presented at the meeting; and
- (2) the Annual Statement of Minimum Revenue Provision for the Council.

27            **TREASURY MANAGEMENT STRATEGY REPORT 2024/25**

The Executive received the report which sought the adoption of the Treasury Management Strategy Report, which incorporated the Annual Investment Strategy 2024/25, as required under section 15(1)(a) of the Local Government Act 2003.

Particular reference was made to:-

- the £20 million placed with other local authorities and banks, of which, £5 million was placed in the CCLA property fund and £23 million with the money market fund;
- section 3.2 of the strategy highlighted the physical long-term borrowing undertaken through the Public Works Loan Board (PWLb); and
- the net interest the Council expected to pay on the General Fund and the HRA was around £1.4 million each.

Councillor M. Mitchell, as an opposition group leader enquired on the £93 million of general fund capital borrowing and whether it went to a specific service and the definition of a UK owned bank.

Councillor Moore, as an opposition group leader enquired on what advice was received for the recommendation on the climate impact council investment.

The Director Finance in responding to questions raised by Members advised:-

- debt was not assigned to a particular service, however debt for purchased commercial properties was monitored to ensure they were still performing;
- banks, including HSBC were classed as a UK banking service; and
- it was difficult to report on deposits and impacts relating to climate impacts, due to how the financial services had been setup.

**RECOMMENDED** that Council adopt the Treasury Management Strategy and delegations contained therein.

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### **HOUSING BENEFIT MODIFIED SCHEME POLICY**

The Executive received the report which sought Member's agreement to reaffirm support for the existing locally allowed disregard of certain war pension income within the Housing Benefit means test.

Executive Members commended the report and highlighted the importance of having clarification of the modified scheme policy.

**RECOMMENDED** that Council approve the proposed Housing Benefit Modified Scheme policy.

29

### **LOCAL COUNCIL TAX SUPPORT SCHEME FOR 2024-25**

The Executive received the annual report which sought Member's agreement on the Local Council Tax Support (CTS) scheme for working age residents for 2024-25. Reference was made to the in-principle agreement council tax exemption for care leavers in October 2023 and to conduct a consultation on a proposed change to the local Council Tax Support Scheme.

Particular reference was made to the 44 responses to the consultation, of which 39 were in favour, which included the preceptor bodies.

Executive Members commended the report and welcomed having a formal position with the scheme.

**RECOMMENDED** that Council approve for the scheme in place for the current year be continued for 2024-25 with the addition of a class of support within the scheme to award 100% council tax support to care leavers looked after by Devon County Council, up to age 25.

30

### **COUNCIL TAX EMPTY HOMES AND SECOND HOMES PREMIUMS FROM 2024-25**

The Executive received the report to re-affirm the agreed recommendations made to Council in February 2023 regarding council tax empty homes and second homes premiums, following Royal Assent being granted to the Levelling-up and Regeneration Act 2023.

Members welcomed the report.

**RECOMMENDED** that Council:-

(1) implement a 100% premium after one year instead of two years on all dwellings that are unoccupied and substantially unfurnished (empty dwellings) in accordance with section 11B(8) of the Local Government Finance Act 1992 with effect from 1 April 2024 subject to any guidance and regulations issued by the Secretary of State;

(2) disapply the provisions of section 11(2)(a) of the Local Government Finance Act 1992 and to apply the provisions of section 11C of the Local Government Finance Act 1992 in order to impose a 100% premium in addition to the 100% Council Tax payable on all dwellings where there is no resident of the dwelling, and the dwelling is substantially furnished (second homes) with effect from 1 April 2025 subject to any guidance and regulations issued by the Secretary of State

(3) approve and adopt the Empty Homes and Second Homes Premium Policy 2024-25 attached to the report presented at the meeting.

4) grant delegated authority to the Council's Section 151 Officer in consultation with the Portfolio Holder for Council Housing Development and Support Services, to amend the policy in accordance with the Council's requirements or legislative requirements including regulations or guidance issued by the Secretary of State.

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### **GENDER PAY GAP REPORT**

The Executive received the report on the Gender Pay Gap, which was a statutory requirement of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, for local authorities who employed over 250 or more employees to produce gender pay gap information relating to employees. The Act required the Council to report on the criteria outlined in the report and to publish the gender pay report by end of March 2024.

Particular reference was made to:-

- the average rate of pay for females working for Exeter City Council was still higher than of males and that average rate had also decreased since last year;
- there were three times more males in the lower level pay than females; and
- the Office of National Statistics (ONS), showed that the medium hourly pay for full time employees, was 6.7% less for women than for men and could take nearly 28 years to close the national gap between men and women's pay.

Councillor M. Mitchell, as an opposition group leader enquired if information was available in regard to male and female pay for similar levels of work?

An Executive Member enquired on whether the quartile of earnings was similar to the previous year's report.

The Director Corporate Services in responding to questions raised by a Members advised that the JCNC ensured roles were evaluated and compared correctly. The quartile of earnings from the previous year would be looked at for inclusion in future reports.

**RECOMMENDED** that Council:-

(1) note the findings and observations report as follows:-

- the average rate of pay for females is higher than males across the Council;
- the mean average difference has decreased since last year from 3.91% to 2.91%;



- the median average difference has decreased since last year from 10.42% to 9.71%; and
- that there are nearly three times more males in the lower quartile of earnings than females.

(2) approves the publication of the Gender Pay Gap Report on the Exeter City Council website, and to the centrally held database on gov.uk;

(3) approves the annual review of the report to track the relationship between female and male earnings.

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### **ANNUAL PAY POLICY STATEMENT 2024/25**

The Executive received the report which set out the Council's annual Pay Policy Statement 2024/25 which was a statutory requirement for approval by Full Council each financial year.

Particular reference was made to the report appendix, which would be amended before the next year's review.

**RECOMMENDED** that Council:-

(1) approve the Pay Policy Report and Appendices for publication in accordance with the legislation.

(2) agree that the £100,000 threshold previously requiring full Council be removed until the legislation referred to in paragraph 3.2 of the report is brought into force in relation to public sector exit payments, and in the meantime, that any payments should demonstrate value for money and be conducive to the effective and efficient operation of the Authority.

(3) agree that the Leader of the Council be informed of any such termination payment made, as soon as possible.

(4) grant delegated authority to the Chief Executive to make necessary amendments to the pay policy statement following any changes in legislation or subsequent increases in pay.

33

### **REVIEW OF THE ARTICLE 4 DIRECTION**

The Executive received the report on the Article 4 Direction, which provided a summary of the comments and outcomes from the notification process undertaken to 'make' a new Direction, as agreed at the Council meeting on 12 December 2023. The report sought approval to 'confirm' the new Direction and to 'make' a further direction to cancel the 2014 Direction with non-immediate effect.

Particular reference was made to there being no changes to the provisions to the amended article four direction and that this was the next stage of the legal process, called the confirmation stage. Once agreed by Council, the next stage would be in notifying interested parties, for implementation in December 2024.

Councillor Moore, as an opposition group leader enquired on what the annual monitoring arrangements were for assessing the impact of the policy.

Councillor M. Mitchell, as an opposition group leader enquired on what monitoring would be undertaken on Wards that were not included in the Article 4 Direction?

Executive Members welcomed the detailed report and thanked officers for the work that had been undertaken.

The Portfolio Holder for City Development commended the report and advised that the consultation data had been used to inform from members of the public on the next stages of the Article 4 Direction and would continue to be monitored.

The Assistant Service Lead – Local Plan in responding to points raised by Members, advised that monitoring of student accommodation would continue and be reported to Members through the working group process and the authority monitoring report.

**RECOMMENDED** that Council approve:-

(1) the confirmation of the revised Article 4 Direction (including the Article 4 area plan) attached at Appendix A with non-immediate effect, meaning it will come into effect on 23 December 2024;

(2) the making of a Direction (“the Cancellation Direction”) cancelling the existing Article 4 Direction confirmed in 2014 as this area would be covered by the new Article 4 Direction; and

(3) for the Director for City Development to confirm the Cancellation Direction as of 23 December 2024 subject to the consideration of any representations received on the same.

34 **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 - EXCLUSION OF PRESS AND PUBLIC**

**RESOLVED** that under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following item on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 2 of Part 1, Schedule 12A of the Act.

35 **APPLICATION TO JOIN SOUTH WEST AUDIT PARTNERSHIP**

The Executive received the report which sought approval for the Council to apply to join the South West Audit Partnership (SWAP). Moving to join an established Audit Partnership would provide the Council and the small team with immediate access to a range of specialist skills, more up to date audit software and increased resilience to support for delivering the audit plan.

Particular reference was made to the resilience issues in the current team and the limited resources available to them, notably for counter fraud, for which the established company would provide additional support. Staff would be offered the opportunity to transfer, which would include same terms and conditions of employment. Staff would also benefit from additional training to support them in enhancing their skills.

Councillor M. Mitchell, as an opposition group leader enquired on the whether the Council would maintain control of its internal audit, the impact to Members, and the cost for joining the partnership.

An Executive Member enquired on the term broadly cost neutral, despite there being no additional financial implications.

The Director Finance in responding to questions raised by Members advised:-

- that there would be no change to the internal audit which would continue to be reported to the Audit and Governance Committee and may be of a higher quality, using the SWAP audit reporting;
- SWAP would support the development of the team and if required, bring in their own experienced staff; and
- there was no cost to join the partnership.

**RECOMMENDED** that Council agree to apply to join the South West Audit Partnership from 1 April 2024.

(The meeting commenced at 5.30 pm and closed at 6.53 pm)

Chair

**The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 20 February 2024.**

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## REPORT TO EXECUTIVE

Date of Meeting: 5th March 2024

Report of: Director Finance

Title: Review of the Corporate Risk Register

### Is this a Key Decision?

No

### Is this an Executive or Council Function?

Risk management is a Council function.

Risk Management is an important element of the council's Code of Corporate Governance.

Regular monitoring of the council's corporate risks helps to ensure that the council's business is conducted in accordance with the law and proper standards, that public money is safeguarded and properly accounted for and used economically, efficiently, and effectively.

### 1. What is the report about?

1.1 The report advises the committee of the council's risk management progress and presents the revised Corporate Risk Register (Appendix A), which has been linked to the Council's Strategic Priorities.

### 2. Recommendations:

2.1 That the Executive proposes to Council any necessary actions to help mitigate the risks for which it is responsible.

### 3. Reasons for the recommendation:

3.1 To ensure that the risks associated with meeting the Council's strategic priorities are properly considered, managed, and monitored.

### 4. What are the resource implications including non financial resources

4.1 The Executive and, Directors and Senior Managers, as appropriate, are asked to review the Corporate Risk Register on a quarterly basis. The register is reviewed quarterly by the Strategic Management Board.

4.2 Any actions agreed to mitigate the risks identified in the Corporate Risk Register may result in some resource implication. These would be subject to a specific report and the resource implications would be considered in that report.

### 5. Section 151 Officer comments:

5.1 SMB and the Executive have produced an agreed new register based on the Council's Corporate Priorities. A new summary page has been added setting out the level of intervention required and the impact of failing to address the risk. The risk in relation to

finance has been updated to reflect the fact that a balanced budget has been set for 2024-25. This does not mitigate the longer term associated risks but carries the risk forward.

## 6. What are the legal aspects?

6.1 None identified.

## 7. Monitoring Officer's comments:

7.1 The risk register identifies for members attention the overall risk to the Council in order that this can be understood and managed proactively, optimising success by minimising threats.

## 8. Report details:

8.1 In light of a review of the council's approach to risk management, the Corporate Risk Register (Appendix A) has been revised following a workshop facilitated by the Council's insurers, Zurich. The risks identified in the revised Corporate Risk Register link to the Council's Strategic Priorities. As part of the Council's Improvement Programme, the Strategic Management Board has reviewed the council's approach to risk and propose that the Corporate Risk Register should be presented to Executive to provide assurance that the appropriate mitigations are in place. The council's Audit & Governance Committee will continue to have a role in ensuring that the council has a robust process in place for identifying and mitigating risks.

8.2 Each risk is assessed against the following matrix, assessing the likelihood and impact before and after mitigation.

Likelihood ↑	4	4	8	12	16
	3	3	6	9	12
	2	2	4	6	8
	1	1	2	3	4
		1	2	3	4
		Impact →			

8.3 The Risk Register will include a new summary page, which will enable Members to see the scope of the corporate risks in one straightforward table.

8.4 Alongside each risk on the summary page, there is a table, which sets out an assessment of the resources required to manage the risks under the themes of Time, Financial, People and Assets. This will allow for an assessment of the resources required to mitigate each risk to an acceptable level allowing members to determine if the resources required are deliverable and achievable.

8.5 In addition, the summary page will include an assessment of how the risks will affect a range of drivers. The drivers are set out below and look at the impact of failing to deliver the corporate priorities and failure in each of the four pillars.

Political	Financial	Reputational	Regulatory	Legal	Compliance	Community
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8.6 The two tables above use Very high, High, Medium, Low and Very Low to assess the resources required and the risk drivers.

8.7 The Final Column will assess the Council's risk appetite, whether it is open to risk, more cautious or even risk averse.

## **9. How does the decision contribute to the Council's Corporate Plan?**

9.1 Good governance contributes to the Council's purpose of a "Well Run Council."

## **10. What risks are there and how can they be reduced?**

10.1 N/A

## **11. Equality Act 2010 (The Act)**

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the report is for information only.

## **12. Carbon Footprint (Environmental) Implications:**

12.1 No direct carbon/environmental impacts arising from the recommendations.

12.2 Actions to mitigate the risks identified in the Corporate Risk Register may result in some future impact, however, any actions proposed would be subject to a specific report and the impacts would be considered in that report.

### **13. Are there any other options?**

13.1 N/A

**Director Finance, Dave Hodgson**

Author: Audit Managers

### **Local Government (Access to Information) Act 1972 (as amended)**

Background papers used in compiling this report:-

None

Contact for enquires:  
Democratic Services (Committees)  
Room 4.36  
01392 265275



Review: Apr-23

Reference	Category	Corporate Plan Alignment Area	Risk Description	Risk Scoring		
				Inherent	Residual	Target Date
1	Strategic	Net Zero Carbon City	Delivering against the key challenges in the Net Zero Carbon City section of the Corporate Plan	16	16	Apr-30
2	Strategic	Healthy and Active City	Making progress towards a Healthy and Active City	12	6	Ongoing
3	Strategic	Leading a Well-run Council	Adapting the council workforce to ensure appropriate skills and experience (Developing a future proof workforce)	9	6	Sep-24
4	Strategic	Leading a Well-run Council	Maintaining the Financial Sustainability of the Council	16	8	Feb-24
5	Strategic	Leading a Well-run Council	Maintaining the Council's Property and Infrastructure Assets	16	12	Feb-24
6	Strategic	Housing and Building Great Neighbourhoods	Delivering Housing and Building Great Neighbourhoods and Communities	16	16	
7	Strategic	Thriving Culture and Heritage	Maintaining a thriving Culture and Heritage sector	9	2	Mar-26
8	Strategic	Prosperous Local Economy	Delivering against the key challenges in the 'Prosperous Local Economy' section of the Corporate Plan.	12	9	Mar-24
9	Strategic	Leading a Well-run Council	Progressing the design and delivery of a corporate Customer and Digital Strategy	16	8	Mar-24

Internal Resources			
Time	Financial	People	Assets
High	High	High	High
Medium	Medium	High	High
Medium	High	Low	Very Low
High	Low	High	Very Low
Very High	Very High	High	Very High
Very High	High	Medium	Low
Medium	High	High	Medium
Low	Low	Low	Low
High	High	High	High

External Risk Drivers for Appetite						
Political	Financial	Reputational	Regulatory	Legal	Compliance	Community
Very High	Low	Very High	Very Low	Very Low	Low	High
Very High	Low	Very High	Low	Low	Low	High
Very High	Very High	Very High	Medium	Medium	Medium	Very High
Very High	Very High	Very High	Very High	Very High	Very High	Very High
Medium	Very High	High	High	Very High	Very High	Very High
Very High	High	Very High	High	High	High	Very High
High	High	Medium	High	Low	Low	Medium
Very High	Very High	High	Medium	Low	Low	Very High
Medium	High	Medium	Medium	Low	Low	Medium

Risk Appetite Rating
Cautious (M)
Open to Risk (H)
Open to Risk (H)
Cautious (M)
Cautious (M)
Open to Risk (H)
Cautious (M)
Open to Risk (H)
Open to Risk (H)

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# Corporate Risk Register

					Review Month:			March 2024			
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
1	<b>Delivering against the key challenges in the Net Zero Carbon City section of the Corporate Plan</b>										
	<p><u>The key challenges are:</u></p> <ul style="list-style-type: none"> <li>GHG emissions in Exeter were on a downward trajectory with emissions down by a third from 2008 to 2019. This reduction is largely due to the reduction in the carbon intensity of the national electricity grid. There has been a 64% reduction in emission from the power sector (with most generation plant located outside Exeter) between 2007 and 2019. It is concerning that emissions from buildings and transport are exceeding targets set for 2020 and the lack of progress in these sectors, combined with growth in the city, will potentially lead to increases in emissions. Significant work to reduce emissions from buildings and transport will be required to deliver Net Zero for the City.</li> </ul> <p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>No resources currently assigned within ECC to Citywide Net Zero ambitions</li> <li>Financial pressures and the large costs of carbon reduction</li> <li>Behavioural challenges over influencing businesses and public</li> <li>Technical capability to deliver and limited solutions available on the market</li> <li>Lack of control over all stakeholders (businesses, visitors etc.)</li> <li>Political environment and acceptance of policy changes required</li> <li>Misalignment with the Devon Climate Plan and the wider UK plan to reduce carbon emissions</li> <li>Failure to engage with resident and business of Exeter to ensure solutions proposed meet real need.</li> </ul> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> <li>Exeter does not meet its citywide target of becoming Net Zero by 2030.</li> </ul>										
	November 2019	PH - Climate & Ecological Crisis Officer Lead: None Identified	4	4	16	We are working with the University and Devon County Council to support their work in this area and focusing on reducing our own carbon emissions. Our internal carbon net zero plan is now the subject of a separate risk register presented half yearly to the Audit & Governance Committee by the Corporate Energy Manager, Net Zero Team.	4	4	16	February 2024: A way forward for City Wide Net Zero was discussed and agreed with SMB. A report was presented to Executive Jan 2024 and Council Feb 2024 Council on a way forward, utilising earmarked reserves. Programme Manager to be established for two years within the structure to lead on City Wide Net Zero with a likelihood of recruitment May 2024. A report will be presented to Strategic Scrutiny every six months.	Apr-30
Page 19	<b>Making progress towards a Healthy and Active City</b>										
	<p><u>Potential causes</u></p> <ul style="list-style-type: none"> <li>Inability to deliver a cost neutral leisure service due to the financial nature of the service, cost of service delivery, and political aspiration of running a well run adequately funded service.</li> <li>Increasing socio-economic challenges and their impact on health inequalities and wellbeing with fuel poverty for example, resulting in reduced mental and physical wellbeing, with people in particular groups increasingly feeling isolated and unable to cope.</li> <li>Finding a sustainable funding model for Wellbeing Exeter, which we know makes a difference to the health and wellbeing of individuals and communities at a time of increasing pressure on public sector budgets.</li> <li>The ongoing risks to public swimming pools, gyms and leisure centres nationwide as a consequence of the Covid pandemic and increasing costs.</li> <li>The impact of the increasing cost of living, wage bill and energy on costs, whilst trying to keep costs to Exeter residents low.</li> <li>Responding to the post-pandemic impact on health inequalities and deprivation including a decrease in physical inactivity for those on low incomes or from culturally-diverse communities.</li> </ul> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> <li>Inability to deliver a cost neutral leisure service.</li> <li>Conflict between aspiration of delivering 'cost neutral' and political expectation to deliver a well run service.</li> <li>Wellbeing Exeter closure and significant impact on creating stronger communities</li> <li>Inequalities deepen across the city.</li> <li>Sport England don't continue to fund work - including capital development for Wonford</li> <li>Short term changes may not be sustainable</li> </ul>										
	May 2023	Portfolio Holder for Leisure and Physical Activity <b>Officer Lead:</b> Director for Culture, Tourism and Leisure	4	3	12	Sport England provide external funding until 2025 and possibly longer. Playing Pitch Strategy identifies opportunities SSP has increased leisure membership beyond 10,000 and provides the opportunity for wider reach. Built Facilities Strategy underway. Engagement with multiple stakeholders around delivery of Wellbeing Exeter. Strong defined and realistic commercial targets monitored regularly	3	2	6	'Discussions between Sport England and Live and Move are taking place around 'Deepening' the work in this next phase. SE want to scale what works in other areas of the country. Those conversations should be completed by March 24 along with any capital financial ask around the potential Wonford redevelopment.	Ongoing

						Review Month:			March 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
3	<b>Adapting the council workforce to ensure appropriate skills and experience (Developing a future proof workforce)</b>										
	<p><u>Key Challenges</u></p> <ul style="list-style-type: none"> <li>- the Council is changing and staff will need to develop new knowledge and skills to meet future needs</li> <li>- the Council has an ageing workforce and does not routinely succession plan</li> <li>- The Council is having difficulty recruiting into key areas</li> <li>- The Council's workforce is not reflective of the city's demographics</li> </ul> <p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>- <u>The introduction of new technology to provide an improved customer experience</u></li> <li>- Competition from the public and private sector in attracting new employees</li> </ul> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> <li>- <u>Loss of experience</u></li> <li>- <u>Increased spending on agency workers</u></li> <li>- <u>Not having cost effective council services delivering the right outcomes</u></li> <li>- Service disruption</li> <li>- Cost of appeals / challenges across the council services</li> <li>- Increased stress / pressure on workforce</li> </ul>										
	June 2019	Corporate & Democratic Services and Environmental Health <b>Officer Lead:</b> Director Corporate Services	3	3	9	Market supplement scheme in place - Apprenticeship opportunities for new and existing staff - Employing part qualified staff and training them (internal and external) - procurement, planning etc. - Improvements in metric tracking (age, gender, skills profiles) - Business Partnering model allowing for greater collaboration between service areas and HR - Metrics reported to SMB Ensure robust implementation of new workforce planning process (local mgmt team led) - Utilising agile program to complement modernisation of work environment - Review of progress against GDR. <u>Further Mitigations due for completion in next 12 months</u> - Review of council's Equalities, Diversity and Inclusion arrangements - Review of recruitment and retention policies - Roll out of new Performance and Development Review process - Pay Strategy Review - Development of Succession Plans for every Service - Development of training programme to meet future needs of the organisation (linked to risk 9)	2	3	6	Risk updated March 2024 Staff metrics tracking now being compared to ONS statistics. New Performance and Development Reviews have been rolled out to staff.	Sep-24

			Review Month:			March 2024					
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
4	<b>Maintaining the Financial Sustainability of the Council</b>										
	<p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>- Inability to deliver £5.1m savings target over four year period (to 2027-28);</li> <li>- Inability to maintain Business Rates income at levels currently generated;</li> <li>- Policy, regulatory or legislative changes which are not fully funded from central govt;</li> <li>- Impact of high inflation, rising interest rates and other external economic factors;</li> <li>- Potential for Local Government Finance redistribution (including a reset of Business Rates);</li> </ul> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> <li>- Significant reductions required to Statutory Services, which become unable to function legally;</li> <li>- unable to balance budget, Government intervention required;</li> <li>- larger than anticipated reductions (in year or over longer term).</li> <li>- reduction in reserves below minimum level;</li> <li>- impacts on council services and therefore resident outcomes.</li> </ul>										
	January 2018	Leader of the Council <b>Officer Lead:</b> Director Finance	4	4	16	Detailed MTFP assessed and agreed with Members; - One Exeter plan agreed and being implemented with suitable governance arrangements in place; - Budget for 2023-24 agreed; - Significant investment in city centre regeneration (St Sidwell's point & bus station) including developing a new vision for the rest of the site which includes mixed use; - Appropriate level of unringfenced general fund reserves to protect against shocks; - Identify and bid for alternative sources of funding; - Lobby government for relaxation of council tax increase restrictions; - The Council has a clear strategy to address the savings required.	2	4	8	May 2023 - The MTFP has been rolled over and work has begun on reviewing the One Exeter Programme in the context of the updated Plan. Energy price inflation has started to ease and is expected to fall over the year before stabilizing. The Council will also benefit from the Change in VAT treatment for Leisure. 'Oct 2023 - SMB have met and finalised the proposals to balance the 2024-25 budget. Some favourable assumptions around energy costs, insurance costs and Government Grant have allowed some of the income challenges to be addressed and deliver a balanced budget from the Service review proposals. The proposals have been checked and confirmed by each Directors (with a small number being removed). No further reductions are required. Longer term, there is a need for a further £5.7m reductions of which proposals totalling £1.3m have been identified. The cross cutting work and digital transformation work will underpin the Council's approach to addressing this gap.	Feb-24

						Review Month:			March 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
<b>5</b>	<b>Maintaining the Council's Property and Infrastructure Assets</b>										
	<p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>• Council owns 100 operational properties and 600 Commercial Properties as well as 28 Bridges, 50 Parks, 90 Play Areas Footpaths, Highways, walls and a River, Canal and other watercourses</li> <li>• Shortages of materials and labour causing delay and increased costs across the capital programme</li> <li>• Interest Rate rises causing the cost of borrowing to rise significantly</li> <li>• Additional Borrowing adds pressure to the financial stability of the Council.</li> </ul> <p><u>Potential impacts:</u></p> <ul style="list-style-type: none"> <li>• Increased costs to Council</li> <li>• Sheer number of assets extremely high for a District Council, potential to cause significant financial harm</li> <li>• Delay in all projects, predominantly the condition survey projects and HRA programme, leading to prolonged periods of buildings being below the standard the Council is aiming for</li> </ul>										
	August 2021	Leader of the Council Officer Lead: Director Finance	4	4	16	<ul style="list-style-type: none"> <li>- Consider Programme of Asset rationalisation</li> <li>- Identify alternative sources of funding to reduce borrowing</li> <li>- Commercial Properties mainly let on a full repairing lease basis</li> <li>- Reviewed existing capital programme to defer and remove schemes.</li> <li>- Change of emphasis to internally borrow in the short term to offset interest rate rises.</li> </ul>	4	3	12	<p>May 2023 - Capital Programme has been reduced. This does not mitigate the risk of deterioration of assets, but manages the risk to the financial position. Targeted review of assets to determine value. Making review of long leases a priority to deliver further capital receipts. 'October 2023 - Progress has been made in implementing the new structure in Corporate Property to deliver the capital programme. The work on a disposal strategy is continuing, which will allow further works to continue. Priority is being given to those statutory service properties and assets, but this is dependent on the Council generating further, significant, capital receipts to deliver without having a substantial, negative impact on the Council's revenue position.</p>	Feb-24

						Review Month:			March 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
6	<b>Delivering Housing and Building Great Neighbourhoods and Communities</b>										
<p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>- brownfield first approach is the most sustainable option, and aligns with government policy but most sites are currently unviable and developers are unwilling to invest, resulting in sites being stalled</li> <li>- inadequate infrastructure funding for brownfield land regeneration</li> <li>- lack of specialist staff resources to support the work</li> <li>- inability to address complex land assembly and infrastructure challenges</li> <li>- significant abnormal costs associated with this type of programme</li> <li>- low land/property values and lack of investment appetite (especially BTR sector)</li> <li>- Significant local community opposition to development</li> </ul> <p><u>Potential impacts:</u></p> <ul style="list-style-type: none"> <li>- significant loss of income to fund services/infrastructure (CIL; S106; NHB; Council Tax; Business Rates) and inability to secure external funding from government</li> <li>- increased traffic congestion and net-zero not achieved by 2030</li> <li>- Exeter Plan found unsound resulting in city housing needs not being met and exacerbating the Devon Housing Crisis, especially in terms of affordable housing; lack of 5-year housing supply resulting in loss of planning control/sub-optimal development and loss of green space/special characteristics of Exeter.</li> <li>- new neighbourhoods not created, existing communities become unbalanced and suffer from lack of infrastructure/services, and economy of the city is stalled</li> <li>- active travel and accessible city aspirations not met</li> <li>- unsustainable development and new homes do not meet Garden City principles</li> <li>- housing built on greenfield sites</li> </ul>											
Page 23	November 2021	Leader of the Council Officer Lead: Director City Development & Housing	4	4	16	<p>Successful bidding for government funding programmes (Brownfield Land Release Fund; Garden Communities; One Public Estate; New Development Corporations Competition Fund) is supporting Liveable Exeter and Council Owned Building projects</p> <ul style="list-style-type: none"> <li>- project management capacity brought in</li> <li>- business cases, feasibility studies, development frameworks for strategic sites undertaken (E.g. Marsh Barton, Southgate, Water Lane)</li> <li>- Director of City Development &amp; Housing appointed</li> <li>- ECC demonstrating willingness to acquire land and property using CPO powers, and dispose of land to the private sector, where necessary to move forward in a sensible phased programme</li> <li>- ECC recognises need to step up the support commensurate with the scale and pace of development required</li> <li>- Through the Exeter Design Quality Partnership ECC has adopted an enabling and collaborative culture with developers and landowners, instilling confidence in the planning process. Enhanced Member Training is offered to improve quality of decision making in planning</li> <li>- Liveable Exeter Place Board established to bring together the city's institutions to take ownership of the vision and aspirations and to work collectively on obstacles to delivery</li> <li>- Preapplication advice on key sites helping to bring development forward more quickly and better quality</li> </ul> <p>- new local plan that includes the vision and principles as part of the formal planning policy</p>	4	4	16	<p>May 2023: Consultation on an outline draft Exeter Plan was completed; A comprehensive study of Council car parks has been concluded; A Stage 1 Feasibility on Southgate completed; Consultants appointed to deliver a Development Framework and Design Code for Water Lane; the Exeter Design Quality Partnership has been established; Planning Performance Agreements have been completed for Water Lane and Exeter St Davids - planning applications anticipated later in year; a successful recruitment process in City Development has been undertaken and only one senior post remains vacant; consultants have been appointed to undertake a FBC for the EDF; The Growth Board meets monthly to monitor progress on LE/brownfield sites and identify delivery solutions; a portfolio of sites for R3 BLRF are being brought together; Vaughan Road Phase 1 has commenced; a project team has been assembled to kick start City Point.</p> <p>October 2023: Exeter Plan: Full draft published for 12-week public consultation on 23.10.2023. Liveable Exeter Projects: Stage 2 Feasibility Study for 'Liveable Southgate' site is underway and due to be completed in March 2024; Draft Liveable Water Lane Development Framework and Design Code published for 6-week public consultation on 23.10.2023. Exeter Design Quality Partnership (EDQP): A planning charter incorporating new pre-application charges to be presented to Executive and Council for approval in November/December 2023. Government funding programmes: Work commenced on Business Case for Exeter Development Fund; Brownfield Land Release Fund 1 (BLRF). Cathedral &amp; Quay car park and Bonhay Meadows - no longer being taken forward and grant monies to be returned to DLUHC; Belle Isle, Canal Basin, Mary Arches Car Park and Lower Weir Road - Delivery Plans are being prepared and discussions underway with One Public Estate (OPE) to vary the terms of the Grant Funding Agreement to allow for delayed land release triggers. Former ECL sites: Clifton Hill - subject to confirmation by Full Council, a delivery plan and business case will be produced. Council Owned Building Programme (COB): Vaughan Road - Phase 1 (35 homes) under construction and Delivery Plans for phases 2 &amp; 3 (56 homes) being prepared; Laings, Rennes House, Chestnut Avenue &amp; Clifford Close - Project Plans for each site being prepared. Planning Applications: Outline planning application received for Water Lane "southern development zone"; Detailed planning application for Haven Banks retail park to be considered by Planning Committee on 05.12.2023. Pre-applications discussions with Network Rail on St David's Station car parks suspended and awaiting new programme and timescales: Other City Development/Housing</p>	

						Review Month:			March 2024		
Ref	Date Risk Identified	Risk Owner	Inherent Risk			Mitigations & Controls	Residual Risk			Tracking notes and monitoring	Target Implementation Date
			L'hood	Impact	Risk Score		L'hood	Impact	Risk Score		
<b>7</b>	<b>Maintaining a thriving Culture and Heritage sector</b>										
	<p><u>Potential Causes:</u></p> <ul style="list-style-type: none"> <li>• Uncertainty around National Portfolio Organisations</li> <li>• To be seen by the Arts Council as 'Priority Place' against levelling up schematics</li> <li>• Moving from delivery to enabling and facilitation</li> <li>• Inability to create a flourishing night-time economy</li> <li>• A need to balance cultural ambition with the national funding picture and local financial challenges</li> <li>• A need to support Visit Exeter as a vital mechanism for promotion of our events, business and cultural offer.</li> <li>• Budget savings to address the medium term financial plan</li> <li>• UNESCO City of Lit working as a separate entity to the city, which is the designation holder.</li> </ul> <p><u>Potential Impacts:</u></p> <ul style="list-style-type: none"> <li>• Loss of NPO funding</li> <li>• Loss of wider impact of cultural regeneration of the city.</li> <li>• Inability to support night time economy</li> <li>• Inability to support cultural sector</li> <li>• Inability to deliver services including RAMM, Corn Exchange, Red Coats, Custom House, Underground Passages, Box Office</li> <li>• Non-renewal of UNESCO status</li> <li>• Reputational impact locally, nationally and internationally</li> </ul>										
	May 2023	Deputy Leader <b>Officer Lead:</b> Director Culture, Tourism and Leisure	3	3	9	Strong relationship with Arts Council England and stakeholders. New five year Cultural Strategy being developed with tangible deliveries. Significant cultural assets owned and run by the cultural sector. UNESCO City of Literature status awarded and monitored. Funding agreed with ACE until 2026 with Exeter's National Portfolio Organisations	1	2	2	The restructure of RAMM's senior team is now complete and the focus is on NPO business case delivery. The renewal of the city's UNESCO designation is also taking place in Q3 of 2023 with ECC officers supporting Exeter City of Literature.	Mar-26
<b>8</b>	<b>Delivering against the key challenges in the 'Prosperous Local Economy' section of the Corporate Plan.</b>										
	<p>The key challenges are:</p> <ul style="list-style-type: none"> <li>• Retention and recruitment, with some difficult-to-fill vacancies, which is stifling business growth.</li> <li>• A rise in residents becoming economically inactive, particularly those in the 50+ age groups.</li> <li>• Matching the learning and skills opportunities for residents with current and future job opportunities.</li> <li>• Low levels of graduate retention from the University of Exeter.</li> <li>• Levels of aspiration amongst our young people and limited awareness of opportunities.</li> </ul> <p><u>Potential Causes:</u> Following budget reductions in April 2019 and the discretionary services review implemented in April 2023 there is no longer an economic development service or skills function. Both discretionary services have ceased and there is no officer resource or budget to progress this corporate priority.</p> <p><u>Potential Impacts:</u> The identified key challenges are not addressed.</p>										
	May 2023	Deputy Leader <b>Officer Lead:</b> Director Net Zero and City Management	3	4	12	We have worked with the University and Exeter College to enable them to take on more of a leading role in this area.	3	3	9	No change	Mar-24
<b>9</b>	<b>Progressing the design and delivery of a corporate Customer and Digital Strategy</b>										
	<p><u>The key challenges are:</u> Digital technology has, and is continuing to change the way people live, connect and work. The Covid-19 pandemic has seen resident and customer expectations shift. Digital technology has evolved significantly and for most of us, digital technologies have become an essential part of our lives and we all want easy access to joined-up information and efficient secure services in the palm of our hand. People increasingly expect to interact with organisations wherever they like, whenever they like, on whichever device they have and on whatever channel they choose. With customer behaviour changing faster than ever, the task of digital transformation demands significant changes to people, processes and technology. We are currently lagging behind many other Councils in our development of digital services and how we engage with our customers to improve and develop them. We have identified this as a priority to address in the One Exeter programme. We are taking a strategic approach and will be launching a draft Customer Communication and Digital Services Strategy consultation alongside developing a digital road map in partnership with Strata our shared IT Company and our co-owners (Teignbridge and East Devon District Councils). Our key challenges are the pace and scale of transformation needed in business processes; functional and organisational structures; culture; skills and resources within the Council and also within and between Strata and our partners.</p> <p><u>Potential Causes:</u></p> <p><u>Potential Impacts:</u> Failure to agree and implement the required level of Corporate change will impact on the ability of the Council to deliver a balanced MTFP which requires transformational change in how are services are delivered. One Exeter requires staff working more effectively to meet increases in demand with higher costs and reduced income. Digital, integrated and automated services are essential to achieving the most cost-effective outcomes for customers.</p>										



						Review Month:			March 2024		
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	May 2023	Leader of the Council Officer Lead: Director Transformation	4	4	16	Implementing a strategic, corporate approach to ICT, digital, automation and customer communication Deeper collaboration and development of shared approaches and services with Strata, Teignbridge and East Devon District Councils Implementing a single integrated transformation programme across the Council, with strong leadership from SMB and the Extended Management Team Breaking down service silos and introducing a customer-centric culture to underpin functional and structural integration across the Council Investing in updating technology resources and skills	2	4	8	Strata Board appointed new Director of ICT and Digital : his leadership is evident in the new more agile and flexible approach to digital and the needs of the Councils within the Strata leadership. Strat and partner Councils have agreed and are implementing a new operational governance architecture which will ensure better alignment and clear routes to achieving transformation objectives. Strata Joint Executive Committee endorsed and supportive of the new approach. A Draft Digital Customer Strategy for Exeter has been produced, consulted upon and is now going for approval by Executive on 7th November and for adoption by Full Council on 12th December. Through the One Exeter programme the Cross Cutting themes project is now moving from discovery into design phase which has the potential to offer a blueprint for the future operating model of the business side of the Council. This will have a greater focus on streamlined business process and operations. MS 365 roll out is well underway and due for completion by end of December 2023. Reseach and development work for a new data strategy and architecture to underpin the aspirations in the Digital Customer Strategy are on track and due for adoption by the end of December 2023. The impact of all this work has reduced the likelihood of the identified risks happening.	Mar-24

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## REPORT TO EXECUTIVE

Date of Meeting: 5 March 2024

## REPORT TO COUNCIL

Date of Meeting: 23 April 2024

Report of: Director of City Development

Title: Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD): Adoption

### Is this a Key Decision?

No

### Is this an Executive or Council Function?

Council

### 1. What is the report about?

1.1 This report sets out the details of a review and update of the Council's Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD), following a 12-week consultation and recommends a final version for adoption by Council.

### 2. Recommendations:

2.1 That the Executive notes the Consultation Statement, which documents the responses to the consultation on the SPD, attached at Appendix A.

2.2 That the Executive recommends that Council approves the adoption of the updated and revised Householder's Guide: Design of Extensions and Alterations SPD attached at Appendix B.

### 3. Reasons for the recommendation:

3.1 As part of the City's Local Development Scheme it was identified that the Council's well-established SPD for householders on extension design had not been updated since 2008 and so did not reflect changes that have been made to policy, nationally and locally, including the adoption of the Council's Residential Design Guide. This update ensures the SPD aligns with current planning policy and guidance.

3.2 Following approval by the Executive Committee on 3 October 2023, a consultation on the draft SPD was carried out between 23 October 2023 and 12 January 2024 in accordance with the Council's Statement of Community Involvement and Consultation Charter. The comments made have been collated and considered, and a revised version of the document addressing the responses has been prepared, with a recommendation that this version is adopted.

#### **4. What are the resource implications including non financial resources**

4.1 The work in updating the document has been carried out by the planning team in City Development, without the need for additional consultancy work. As a result, there are no budget implications.

#### **5. Section 151 Officer comments:**

5.1 There are no financial implications to consider in this report.

#### **6. What are the legal aspects?**

6.1 The Planning and Compulsory Purchase Act 2004 establishes a system of local development planning in England. The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767) (the “Regulations”) make provision for the operation of that system. The legal process for preparing, consulting on, and adopting SPDs is set out in Part 5 of the Regulations. The Householder's Guide: Design of Extensions and Alterations has undergone consultation, and a Consultation Statement has been prepared. These processes adhere to the Regulations.

#### **7. Monitoring Officer’s comments:**

7.1 The Monitoring officer welcomes this report given that the result is to update the Householder Guide following public consultation.

#### **8. Report details:**

##### Background

8.1 Household's planning applications make up around 20 to 30 per cent of the total dealt with by the City Council. The existing 'Householder's Guide to Extension Design' SPD sets out a clear set of principles that guide homeowners to help ensure their planning applications for extensions and alterations succeed. This is based on design policies DG1 and DG4 of the adopted Local Plan First Review. The document covers themes including local distinctiveness, the design of homes, outbuildings, and function of gardens amongst others. Over the last 15 years this has helped to protect the living conditions of those living adjacent to householder developments whilst ensuring the special character of the city is maintained.

8.2 A review and update of the SPD has been carried out. This has been needed as there have been changes to adopted and emerging local plan policy; the publication of the National Planning Policy Framework and Planning Practice Guidance; amendments to permitted development rights that affect householders; and the publication of the Council's Residential Design SPD.

##### Updated Supplementary Planning Document

8.3 The updated document seeks to reflect changes in local and national policy and the Council's Residential Design Guide. Key changes in the document available for consultation include:

- Further consideration of gardens and boundary treatments;
- Refinements on the advice on building design;

- Supplementary advice on the addition of roof lights and solar panels to properties;
- Additional advice on outbuildings; and
- A new title: Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document.

### Consultation and responses

8.4 A consultation on the updated document was carried out between 23 October 2023 and 12 January 2024. The document has been updated in light of the responses (as set out in the attached Consultation Statement at Appendix A). The next stage is adoption of the SPD.

8.5 The consultation period for the SPD was nearly 12 weeks long, approximately twice the requirement of the Consultation Charter. The consultation made use of Commonplace, the interactive online engagement platform that has been used by the Council for several other consultations, included a number of exhibitions where material was presented alongside the Exeter Plan, was advertised through a series of emails, press releases and social media and the consultation material was made available in all city public libraries and the reception of the Civic Centre. Responses could be made online, via email or in paper form.

8.6 Following nearly 12 weeks of consultation, 24 unique commenters provided responses, including the Environment Agency, South West Water, Devon Wildlife Trust, and members of the public. A summary of comments is set out in the Consultation Statement attached in Appendix A, but they can be summarised as suggesting the need for:

- Clarification and further advice on extensions that are located in flood zones and how they can help reduce flood risk;
- Guidance on the use of sustainable drainage systems;
- Guidance on how schemes should best link in with the city's sewerage and drainage system;
- Changes to advice to protect and enhance wildlife and biodiversity; and
- Additional minor editorial changes.

8.7 Following review of the consultation responses, further amendments have been made to the SPD including:

- Additional paragraphs on flood risk and sustainable drainage schemes;
- Additional wording on sustainability and environmental performance, design including contemporary design, permeability, surface water run off;
- Information on nesting birds;
- Further emphasis that the SPD relates to work falling outside of permitted development; and
- Section on 'other permissions that fall outside of planning permission' has been expanded to include restrictive covenants and party wall agreements.

8.8 The proposed final version of the Householder's Guide: Design of Extensions and Alterations is at Appendix B.

## **9. How does the decision contribute to the Council's Corporate Plan?**

9.1 The SPD consultation, followed by its adoption, will be important in ensuring the delivery of objectives in the Council's Corporate Plan. Specifically: 'Building great neighbourhoods,' helping deliver a 'net zero carbon city' and deliver a 'thriving culture and heritage.'

## **10. What risks are there and how can they be reduced?**

10.1 The Government has been consulting on reforms to national planning policy. The consultation included a proposal that would repurpose SPDs and change the process for their preparation. If this proposal were to be implemented, it could affect the lifespan of the SPD. Further consideration will need to be given to an appropriate response to this risk in due course.

## **11. Equality Act 2010 (The Act)**

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and
- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

11.4 In recommending the adoption of the SPD, no potential impact has been identified on people with protected characteristics as determined by the Act: See attached Equalities Impact Assessment.

## **12. Carbon Footprint (Environmental) Implications:**

12.1 The SPD includes guidance that supports proposals that will reduce carbon emissions and impacts upon the environment.

## **13. Are there any other options?**

13.1 The document could remain unchanged, but this would not reflect the most recent policy and government guidance so could result in confusion and weaken the status of the document as part of the decision-making process for householder applications.

**Director of City Development, Ian Collinson**

Author: Hayley Stokes, Assistant Service Lead (Development Management)

**Local Government (Access to Information) Act 1972 (as amended)**

Background papers used in compiling this report:-

Current version of the SPD: Householder's guide to extension design SPD

Consultation version of the SPD: Householder's Guide: Design of extensions and alterations SPD

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## APPENDIX A

### Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD)

#### Consultation Statement

**Consultation dates: 23rd October 2023 – 12th January 2024**

#### 1. Introduction

This report reviews the responses received to the Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD) consultation.

This SPD consultation resulted from a review and update of the existing SPD originally adopted in 2008. The document provides a clear set of principles for householders submitting planning applications for extensions and alterations to their properties. It has been updated to ensure it aligns with current national and local planning policy and guidance.

#### 2. Householder's Guide SPD proposed updates: consultation version

Key proposed updates included in the consultation version of the SPD:

- Change of SPD title: Householder's Guide: Design of Extensions and Alterations SPD.
  - *Previous title: Householder's guide to extension design*
- Additional guidance on design details, materials, the relationship of the development to site boundaries, garden size, access, parking and cycle storage.
- Additional guidance on the design, size and position of side extensions.
- Additional guidance on corner plot development, particularly the need to retain building lines and openness.
- Text relating to loft conversions and associated dormer extensions amended to refer to changes to permitted development rights. This includes the need to use materials that match the existing roofing material.
- Additional design advice on roof lights and solar panels.
- Additional guidance on altering roof shape and size, and roof terraces.
- Additional guidance on the difference between outbuildings or annexes that would be considered ancillary to a house, and those that would be considered to form a new dwelling.
- Additional guidance on boundary treatments i.e. fencing around properties, and the need for boundary treatments to reflect local character and the character of the city.
- The requirement that rear extensions should not normally exceed two thirds of the width of the original house has been removed.

### 3. The consultation

To comply with legislation, it was necessary to publicly consult on proposals to revise the SPD for a minimum period of 4 weeks. The Householder's Guide SPD was available for public comment for just under 12 weeks from 23rd October 2023 until 12<sup>th</sup> January 2024. This consultation period exceeded the statutorily required minimum (4 weeks) and the six weeks required by the Council's Consultation Charter.

The consultation ran alongside public consultations for the outline draft Exeter Plan and the Liveable Water Lane SPD. The consultation complied with the Council's adopted Statement of Community Involvement and Consultation Charter.

Responses to proposed updates and the SPD were invited online through Commonplace, the interactive online engagement platform that has been used by the Council for several other consultations. The option to email or post responses was also available, along with the availability of paper copies of consultation questions on request, plus other versions and support as required.

This report summarises responses to the consultation. Consultation questions were structured to enable respondents to provide detailed comments, or to reply quickly and easily if they had less time. The questions focussed on the major proposed SPD updates however general comments on any aspect of the SPD were also invited.

The consultation was promoted through extensive means including:

- Exeter City Council's weekly e-newsletter (available through 'Stay Connected') which goes to over 4,000 people across the city.
- Public exhibitions held across the city, running daytime into evening to promote access. Exhibitions included paper copies of the SPD, leaflets summarising the SPD consultation and the opportunity for people to ask questions and discuss the SPD with officers from the City Development team.
- Email / post notification for all those included on Exeter City Council's planning policy database.
- ECC online news article.
- Included in an article in the November 2023 edition of the Exeter Citizen which goes to each address in Exeter.
- Promotion on ECC social media platforms.
- Fully accessible online consultation documents, plus other formats available on request.
- Audio version available online and on request.

### 4. The survey

The general form of questions used throughout the consultation survey was to initially ask whether they agreed or disagreed with the proposed update, with a follow-up open question asking for more detail as to why they felt that way and to provide any other comments.

Respondents had flexibility in responding and were able to choose which questions they answered. It was not a requirement to provide an answer to all questions. It was possible to answer the initial agree/disagree question without providing further comment or vice versa. Similarly, those who submitted email responses did not

necessarily follow the survey format, but these tended to either be general comments, or responses were directed to respond to specific sections of the SPD.

## 5. Response overview

24 unique commenters responded to the consultation:

- 18 via Commonplace
- 5 via email
- 1 verbally in response to the audio version of the SPD

Of these commenters, six identified they were responding on behalf of an organisation with the remaining 18 responding as individuals.

The six responses that identified there were responding on behalf of an organisation were:

- Barc Architects
- Devon Wildlife Trust
- Environment Agency
- Historic England
- National Highways
- South West Water

## 6. Overview of responses

This section provides an overview of the responses provided to each of the five survey questions, and a summary of the additional comments received. A table detailing all comments received is available in Appendix A.

### Question 1

- **Do you agree or disagree with the additional advice on gardens? (Paragraphs: 3.12 – 3.13)**
- **Why do you feel this way and do you have any other comments?**

This new section highlighted that gardens are important to protect now, and in the future, and identifies other relevant policy to refer to.

Eight people responded directly to this question and five of these agreed with the additional advice included in the updated SPD, and three disagreed. Comments of agreement included the importance of gardens in reducing run off, contributing to biodiversity, mitigating against the effect of climate change and for the wellbeing of all. Also raised was the potential to require planning permission for laying impermeable surfaces and astroturf in gardens.

Of the three responses that disagreed with the additional advice provided on gardens, one provided no further comment, and the other raised the following issues which have limited connection to the particulars of the question, rather, relating to the SPD more broadly:

- Suggestion to provide further advice on good design and proportioning.
- Specifics relating to window replacement, glazing bars and saving energy.
- Suggestion rear extensions should be allowed more flexibility as considered to have less impact on street scene.

- Consideration of shading and overheating with relation to larger glazed rear extensions.
- Roof ridge step down shouldn't be required where justified.
- In referencing the SPD General Principles and contemporary design, a respondent raised these should be assessed on a case-by-case basis.

### **Question 2**

- **Do you agree or disagree with the removal of the advice that rear extensions should not normally exceed two thirds of the width of the original house?**
- **Why do you feel this way and do you have any other comments?**

Five people responded directly to this question, and four of the five agreed with the removal of this requirement. Comments of agreement included that the requirement was unnecessary, and negatively impacted design, that a similar more flexible approach should be taken with regard to the depth of extensions as well, and all extensions should mitigate for the loss of permeable areas.

One respondent disagreed with the proposed removal of the requirement for extensions to not normally exceed two third of the width of the house providing explanation for their disagreement as "too specific".

### **Question 3**

- **Do you agree or disagree with the additional guidance on the design, size and position of side extensions? (Paragraphs: second half of 5.3; 5.5; 5.7; 5.11; 5.12).**
- **Why do you feel this way and do you have any other comments?**

This section expanded on guidance for side extensions, this included further information on terracing and corner plots.

Three responses were received to this question with one agreeing and two disagreeing.

The comment in agreement with the advice explained the respondent felt this way because they believe such extensions contribute to urban creep and the planting of trees and/or installing green roofs should be a condition applied to all extensions to enable the granting of planning permission.

The two respondents who disagreed did so because one didn't feel that subservience is a good principle too often leading to disjointed buildings and constructional complexity, and the other considers the guidance on side extensions to be restrictive policy that favours some and not others.

### **Question 4**

- **Do you agree or disagree with the additional design advice on roof lights and solar panels? (Paragraphs: 6.8 – 6.15).**
- **Why do you feel this way and do you have any other comments?**

This question relates to updated guidance on the size, positioning and acceptability of roof lights, and solar panels when planning permission is required. It is important to note that the majority of solar panel development is allowed through permitted development. Elsewhere in this section, text was updated in relation to permitted development and Exeter City Council's requirements relating to dormer development.

Three responses were received to this question and all three disagreed with the additional design advice on roof lights and solar panels, however the comments provided by all three respondents related to other matters, namely:

- Specifics relating to the guidance on dormers.
- The presence of restricted covenants in some areas and the reminder of the need for permission to be sought for covenants, in addition to planning permission.
- Confusion as the guidance only relates to works falling outside of permitted development.

### **Question 5**

- **Do you agree or disagree with the additional guidance on roof size and shape, balconies and roof terraces? (Paragraphs: 7.2 – 7.9).**
- **Why do you feel this way and do you have any other comments?**

This question relates to additional guidance on roof size and shape, balconies and roof terraces, including raising the roof ridge and additional storeys.

Two responses were provided to this question, one agreeing and one disagreeing. The person who disagreed provided no further comment, and the person agreeing expanded on their answer suggesting encouragement for green roofs on flat roof dormers.

### **Other comments**

Other consultation responses provided can be split by those in reference to the SPD's twelve General Principles, and then general comments.

#### **General Principles**

Five respondents made comments on the General Principles and supporting guidance (Chapter 3) that all extensions should follow. Comments included:

- General Principle 6 - Roofs: Suggested rewording removing principle that extension roof ridge should be lower than the main roof; and suggestion for principle to address surface water.
- General Principle 10 – Integrated design: Suggestion to include comment to address surface water, and include property flood resilience in list of items to integrate.
- General Principle 11 – Landscape: Suggestions to include specifics relating to garden ground levels in flood zones, the need maintain access to Main Rivers, and strengthen the General Principle's requirement to positively contribute to biodiversity.
- Suggestion to introduce a new General Principle on drainage that refers to building regulations requirements.
- Recognition of the importance of asking householders to consider the strategy for rainwater disposal and surface water drainage.
- The potential constraint flood zones have to the conversion of garages to habitable accommodation.
- Suggestion to include wording on biodiversity and minimising increases in impermeable surface of gardens.

### General comments

The remaining responses provided in the 'any other comment' free text box can be summarised as suggestions to:

- Provide greater detail on flood risk, sustainable drainage, sewer connections run off associated with extensions, property flood resilience, and requirements relating to flood zones and building in proximity to watercourses.
- Provide more support for householders wishing to make improvements that would support sustainable travel rather than support for tarmacking front gardens.
- Prevent alterations that would have negative ecological and surface run off impacts, such as tarmacking driveways or replacing lawns with artificial grass.
- Provide more information on nesting birds and development.
- Strengthen the requirement to positively contribute to biodiversity.
- Provide more support for rewilding.
- Ensure the SPD is clear that planning permission is needed when permitted development rights are not in place.
- Publicise party wall agreements more clearly.

## **7. Post consultation Householder's Guide SPD amendments**

This section outlines amendments made to the Householder's Guide SPD having considered the consultation responses received. The numbers refer to the paragraph section in the 'proposed adoption version' of the SPD rather than the consultation version. The table in Appendix A responds to all comments received.

### 1. Introduction

- 1.9 – 1.11: Further detail regarding the information and documents required to be submitted with a planning application.
- 1.17: Paragraph expanded to encompass broader sustainability and environmental performance considerations.
- 1.22 – 1.33: New sections on flood risk and sustainable drainage.
- 1.38 – 11.39: New section on other permissions separate to planning permission, adding party wall agreements, and restrictive covenants to the existing mention of building regulations.

### 2. Policy Context

- Minor wording updates

### 3. General Principles

- General Principle 10 – Integrated Design: Wording amended to include reference to integrating flood resistance and sustainable draining measures, as well as other elements previously mentioned in the principle.
- 3.3 – 3.5: Site design wording amended, including addition of consideration of water courses, flood risk and aspect.

- 3.6: Amended wording within 'contemporary design' to expand on when this may be acceptable.
- 3.12: Further information about potential constraints associated with converting garages within flood zones.
- 3.14 – 3.15: Further text on gardens including trees, the role of gardens in decreased run off, surface permeability, townscape, and biodiversity to raise their profile when considering householder development.
- 3.19: Additional paragraph on considering materials and environmental impact.

#### 4. Rear Extensions

- 4.8: Further information on 'wraparound' extensions and how they will be considered in planning.

#### 5. Side Extensions

- 5.8: Further information on 'wraparound' extensions and how they will be considered in planning.

#### 6. Loft Conversions, Roof Lights and Solar Panels

- Minor wording amendments to emphasise the SPD refers to building works that fall outside of permitted development rights.

#### 7. Roof Extensions and Alterations

- 7.2: Additional information on hip to gable design considerations

#### 8. Detached Garages, Outbuildings and Boundaries

- 8.6: Additional text on preference for permeable surfaces for driveways and consideration of surface water run off.

#### 9. Other Relevant Information

- 9.9 – 9.10: Additional information provided on bats and nesting birds.
- Flood risk section deleted from here and expanded flood and sustainable drainage information added to chapter 1.
- 9.15 – 9.16: Underground services and sewers section has additional information on sewer connection, surface water disposal hierarchy, and building in proximity of sewers and water mains.

### **8. Strategic Environmental Appraisal (SEA)**

In updating and consulting on this SPD, a Strategic Environmental Appraisal Initial Screening Statement was prepared. The Initial Screening Statement concluded that, for the reasons explained in the Statements, the SPD will not have significant environmental effects and therefore does not require a Strategic Environmental Assessment.

The Environment Agency, Historic England and Natural England were consulted on the Initial Screening Statement, in accordance with section 4 of the Environmental Assessment of Plan and Programmes Regulations 2004.

Historic England and Natural England both responded to the SEA consultation based on their own interests. Both bodies agreed with the Council's conclusion that there are unlikely to be significant environmental effects from the proposed Householder's Guide SPD and that it does not appear necessary to undertake a Strategic Environmental Assessment of this SPD.

## **9. Conclusion**

While this SPD consultation received a relatively small response, constructive comments were provided. Many of these comments have been incorporated in further SPD updates made post consultation. Of the comments received that have not resulted in changes, this reflects the limitations of the document whereby it cannot account for every scenario that may arise in terms of householder developments, and that an SPD cannot introduce new policy requirements that do not reflect or supplement national or local plan policy requirements. The table in Appendix A includes responses to all consultation comments received.

The importance of providing greater information on flood risk, drainage and support for the preservation of gardens, permeable surfaces and biodiversity were the strongest response themes. It is difficult to draw further firm conclusions of support or lack of support for the proposed SPD changes. This is in part due to the response size, but also because the explanation provided for agreeing or disagreeing with a proposed amendment often did not relate to the amendment in question, or comments related to very specific issues, or opinions on design. Where reference to requesting more flexibility was made, particularly in terms of design, it is important to remember that while the content of this SPD is a material consideration when determining householder planning applications, each planning proposal is also considered on its own merits in line with policy when deciding whether to grant planning permission.



## APPENDIX A – Table of all consultation comments received and Exeter City Council's responses

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
<b>OVERVIEW</b>				
	1 Environment Agency		<p>Householder extensions and alterations which will increase occupancy have the potential to increase pressure on combined sewer systems. Such proposals present an opportunity to look to mitigate water quality impacts by removing surface water from the combined sewer system where possible, for example by taking roof and surface water to an onsite soakaway or sustainable drainage system (SuDS) where possible, and where ground conditions do not allow this, attenuate surface water before discharging to the combined sewer. Similarly, proposals should minimise any increase in impermeable surfacing and roof cover due to impact on surface water runoff.</p> <p>In addition, householders could look to include devices such as water butts on new extensions and downpipes, grey water reuse, etc, solutions should be proportional to the alterations/extensions being proposed.</p>	Paragraph 1.16 in the sustainability section has been expanded to encompass broader sustainability and environmental performance considerations.
	2		SWW wish to highlight the need for extensions and conversions to abide by the	Underground services and sewers section has additional information

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
	South West Water		<p>surface water disposal hierarchy, as described within Building Regulations Part H (Requirement H3) (and successor documents), where development is implemented through the use of Permitted Development rights or a granted planning permission. If a householder's property has an existing connection for their domestic surface water into a public sewer, this does not provide an automatic right to connect into the same sewer with subsequent development.</p> <p>SWW wish to direct potential householders of the following guidance to be aware of SWWs policy in relation to works in proximity to statutory assets, and potential build-overs: Building near a public sewer   Building &amp; Development   South West Water and Building near water mains   Building &amp; Development   South West Water. [links provided in original response]</p>	on sewer connection, surface water disposal hierarchy, and building in proximity of sewers and water mains.
<b>CHAPTER 2. POLICY CONTEXT</b>				
	1 Environment Agency		<p><b>Para 2.3</b> We recommend that paragraph 2.3 is altered to say 'living conditions for neighbours and occupiers'.</p>	Sentence amended to end after 'living conditions'.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			<p><b>After paragraph 2.5</b> We suggest a point is added around design in terms of its sustainability and future resilience opportunities as well as the other more aesthetic based design aspects. Design aspects which lessen the property's contribution to climate change effects, flooding and water quality whilst also increasing property resilience to the impacts of these.</p>	<p>The sustainability section in chapter 1 has been expanded to encompass broader sustainability and environmental performance considerations.</p>
<b>CHAPTER 3. GENERAL PRINCIPLES</b>				
	3 Individual		<p>General Principles - <b>section 6</b>, Roofs. I feel that this should read "Roofs should match the main roof in terms of shape, pitch and materials. The ridges or the highest rooflines and the eaves-line should be no higher than that of the main roof."</p> <p>I feel that forcing extensions to have a lower ridgeline introduces construction complexity which is likely to lead to long term maintenance problems.</p> <p>Visually it often gives a disjointed and unpleasant appearance to the property.</p>	<p>Point noted. The General Principle has remained unchanged as the Council sees value in retaining this as a general principle of extension design. Each planning proposal is assessed on its own merits in line with policy.</p>

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
	1 Environment Agency		We recommend that either <b>point 6 (roofs) or point 10 (integrated design)</b> should include a comment on the need to better address surface water where roof space or overall impermeable surfacing is being increased such as SUDS, water butts, attenuation rather than direct to combined sewer. This is particularly pertinent where a proposal includes additional bedrooms.	General Principle 10 wording amended to include reference to integrating flood resistance and sustainable drainage measures into design.
			<b>Point 10</b> should include property flood resilience (PFR) in the list of items to integrate where applicable.	General Principle 10 wording amended to include reference to integrating flood resistance and sustainable drainage measures into design.
			<b>Point 11 (landscape)</b> could highlight that garden ground levels should not be raised where they lie in flood zones 2 or 3 and boundaries and garden structures should not be placed in the flood zone or prevent access to Main Rivers.	This detail has been included in the new flood risk section in chapter 1.
			<b>Para 3.9</b> Pleased to note that paragraph 3.9 asks householders to consider the strategy for rainwater disposal/surface water drainage. This is important so that drainage is not an afterthought.	Thank you for your comment acknowledging the importance of this point included in the SPD.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			<p><b>Para 3.11</b> On access, parking and servicing, paragraph 3.11 should note flood zones as a potential constraint to conversion of garages to habitable accommodation.</p>	<p>This has been included in what is now paragraph 3.12, in addition to text referring to where there is the loss of a potential parking space requiring the local highways authority to be consulted.</p>
			<p><b>Para 3.12</b> We recommend that paragraph 3.12 in respect of gardens is amended to include 2 more bullets; one regarding no net loss of biodiversity and one around the need to minimise any increases in impermeable surfacing of gardens.</p> <p>The latter is an important point relating to householder development. The gradual urban creep of the city through additional hard surfaces for patios and parking combined with extensions and increased roof areas will further increase unattenuated surface water going into the combined sewers and increase the risk of CSOs directly to watercourse or indirectly via surface water sewers. Heavy rainfall events are likely to increase in frequency due to climate change which will increase pressure on the sewerage network with associated risks to water quality.</p>	<p>The value of front gardens to townscape, biodiversity and run off / permeability has been added to the gardens section (paragraphs 3.13 – 3.15), which also references protected tree works.</p> <p>The SPD is unable to require no net loss of biodiversity or prevent impermeable surfacing of rear gardens as this would be considered a new policy rather than supplementary to an existing. The SPD does suggest these issues be considered in the design process. Much of the work that can be done relating to surfacing or rear gardens can be done without planning permission therefore there is currently no control of this through planning.</p>

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
	2 South West Water		<p>For the avoidance of doubt, SWW would suggest the inclusion of 'Drainage' as an additional 'General Principle' within the SPD. Potential wording of which is drafted below for consideration:</p> <p>'Drainage: Any additional surface water drainage as a result of development should be disposed of in line with Building Regulations Requirement H3. The use of rainwater harvesting and storage is encouraged.'</p>	<p>The decision was taken to not add a new General Principle as the SPD references to the need to adhere to building regulations, and a new section on flood risk and drainage has been added. Additional text has been included in chapter 9 within 'underground services and sewers', relating to sewer connection, surface water disposal hierarchy, and building in proximity of sewers and water mains.</p>
	5 Devon Wildlife Trust		<p>Point 11 states 'Landscape Extensions should be designed to minimise the impact upon existing soft and hard landscape features that positively contribute to local character, biodiversity...'. Whilst it is important to ensure that the design of proposed development minimises impacts on existing biodiversity, in line with current government policy we would urge the LPA to adopt higher aspirations than to merely 'minimise'. A sentence is needed here which states that 'opportunities to improve biodiversity in and around extensions must be integrated as part of their design'. This is to ensure compliance with NPPF para. 180.</p>	<p>This is an important point however NPPF paragraph 180 doesn't allow for such a requirement to be added to this document. However, the importance of protecting and enhancing biodiversity has been strengthened throughout the document. Notably in the following sections: gardens, ecology, sustainability and drainage.</p>

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
<b>Question 1 regarding additional guidance on gardens</b>	8 Individual	Agree	Gardens should be protected as they are essential for reducing run off which contributes to flooding. Impermeable patios, decking and fake grass should be discouraged. Permeable materials should be promoted.	Much of this work can be done without planning permission. The SPD suggests consideration of these matters, and this has been strengthened in chapter 3.
	13 Individual	Agree	I agree about the importance of gardens and biodiversity and for this reason I feel that planning permission must be sought to lay astro-turf in gardens or to reduce a garden's greenspace more than 50%. I do not agree that extensions cannot be separate properties as long as these properties pay council tax and are included in the 5YLS.	This proposes changes to national policy and permitted development rights, which isn't within the scope of this SPD.  The SPD has sought to raise the profile of consideration of permeable surfaces.  The acceptability of outbuildings as new dwellings will fall to individual assessment of the proposal and the site, and whether a new dwelling to meets set requirements.
	14 Individual	Agree	Acknowledgement of the benefit of gardens and green space to individuals, families and communities; the importance of maintaining and getting local biodiversity; and the role of green spaces in missing against the effects of climate change (e.g. cooling urban areas, improving drainage, growing food).	The SPD suggests consideration of these matters, and this has been strengthened in chapter 3.
	15 Individual	Agree	I agree that urban gardens are essential to the survival of biodiversity in the UK so	Thank you for your comment. Local policy seeks to provide and retain external amenity spaces and

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			should be safeguarded through planning requirements.	gardens where possible. Ultimate safeguarding of gardens would require national planning policy amendments.
	16 Individual	Agree		N/A
	20 Individual	Disagree	Further advice is needed about good design and proportioning. Replicating the original does not necessary lead to good design.	Each planning application is assessed against planning policy on its own merits.
Sometimes it is not possible to replicate the existing very thin glazing bars if a window is being replaced with high performing double or triple glazing. Saving energy is not mentioned.			Each planning application is assessed against planning policy on its own merits.  Environmental performance is a key consideration, and raised in the introduction as being given merit, but it doesn't automatically supersede all other considerations.	
Extensions at the rear of buildings should be allowed more flexibility in design than those at the front or side, where the street scene is more important.			Each planning application is assessed against planning policy on its own merits.	
Generally people like open and connect with their gardens at the rear, and this would mean larger glazed areas. Shading and overheating should be a consideration, with an allowance for shading features at the rear in particular.			Each planning application is assessed against planning policy on its own merits.	



Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
	4 Individual	Disagree	<p><b>6</b> - In some scenarios having no ridge step down benefits the building, structure and performance. With correct justification, this should be allowable in certain scenarios/building types.</p> <p><b>General principles 7 &amp; 8 and contemporary design 3.5 &amp; 3.6</b> - Some visually contrasting or contemporary designs can harmonise with a host building, without matching architectural details, materials or features. In this case, with justification and design rationale, a judgement should be made on a case by case basis. The wording of the general principle clauses referred back to in clause 3.6 is quite limiting in this regard. Eg Stepping outside of the design guide should be possible with the right quality design.</p>	<p>Each planning application is assessed against planning policy on its own merits, and as raised, any alternative requires correct justification.</p> <p>Extensions are expected to follow the general principles, and where not, for the proposal to be explained and justified in that particular circumstance. The SPD wording has been updated to make this clearer.</p>
	24 Individual	Disagree		N/A

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
<b>CHAPTER 4. REAR EXTENSIONS</b>				
	1 Environment Agency		4 Rear extensions: Suggest that an additional point is inserted which highlights if the property in question is adjacent to a watercourse, a structure-free buffer may be required. Where a watercourse is designated as a Main River, works may also require a Flood Risk Activity Permit under the Environmental Permitting Regulations.	This information has been included in the new flood risk section in chapter 1.
<b>Question 2 regarding removal of the advice that rear extensions should not normally exceed two thirds of the width of the original house</b>	6 Barc Architects	Agree	I also think that the limit on the depth of extensions should be increased or at least an exception made for well designed and considered extensions that serve to improve the local built environment.	Each planning application is assessed against planning policy on its own merits.
	3 Individual	Agree	Unnecessary and leads to disjointed designs	Comment noted.
	7 Individual	Disagree	Too specific	Comment noted.
	8 Individual	Agree	All extensions should include mitigation for the loss of permeable areas. Roof gardens or planting trees should be encouraged.	The SPD has sought to raise the profile of consideration of

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
				permeable surfaces, and this has been strengthened in chapter 3.
	9 Individual	Agree		N/A
<b>CHAPTER 5. SIDE EXTENSIONS</b>				
<b>Question 3 regarding the additional guidance on the design, size and position of side extensions?</b>	3 Individual	Disagree	I do not agree that "subservience" is a good principle (fig 5.1 and 5.2). It leads to constructional complexity and weaknesses. It may be appropriate in some cases to avoid terracing (fig 5.5), but too often it leads to a disjointed buildings and not a better streetscape.	Comment noted. The Council sees value in retaining subservience as a general principle of extension design.
	8 Individual	Agree	Urban creep, through extensions and concreting areas, significantly contributes to localised flooding. Planting trees and/or installing green roofs should be a condition to allow any extension.	The SPD is not able to mandate such matters, but it does encourage consideration of these matters, and environmental performance, reduced run off, flood risk, drainage, and the importance of gardens and trees. All of these themes have been strengthened in the SPD update.
	23 Individual	Disagree	This is very restrictive policy that favours some and not others	Comment noted.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
<b>CHAPTER 6. LOFT CONVERSIONS, ROOF LIGHTS, SOLAR PANELS</b>				
<b>Question 4 regarding the additional design advice on roof lights and solar panels.</b>	10 Individual	Disagree	To maximize the liveable space/use of a property if a family need to increase the amount of rooms, a much more efficient use would being able to have a dormer up to the existing height of the roof, and not half a meter below it. Also to say if dormers are not already in a road you cannot get permission to put them is ridiculous, and will exclude many roads from being able to have them if needed for no reason at all. Also the stipulation of mostly having them on the rear elevation is odd and may not make sense to anyone in that area. A better stipulation would be where the front or back of a house does not overlook neighbours then that should be encouraged.	The SPD is relevant to proposals that fall outside of permitted development. Each planning application is assessed against planning policy on its own merits to consider acceptability.  Some of the detail within this comment relates to permitted development requirements which are set nationally.
	11 Individual	Disagree	In addition to conservation areas some developments may have restrictive covenants not to alter appearances (eg Gras Lawn). These should also be referenced as although they may not be a planning matter it is something householders should make them selves aware of and seek the relevant permission.	A section on 'other permissions separate to planning permission' has been added to chapter 1 of the SPD and refers to the need to check for restrictive covenants, and a reminder that these lie entirely separate to planning permission.  A section within chapter 2 refers to well-designed distinctive areas, including mention of Gras Lawn,

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
				and the need to protect the unique characteristics of such areas.
	4 Individual	Disagree	Rooflights and solar panels are allowable under Permitted Development within Conservation Areas and the additional design advice is confusing in this regard. This design guide should be limited to works falling outside of Permitted Development rights.	This section, and other areas within the SPD, outlined that it refers only to solar panels and other work that requires planning permission i.e. falling outside of works allowed under permitted development. This has now been reiterated to try to make it clearer.
<b>CHAPTER 7: ROOF EXTENSIONS AND ALTERATIONS</b>				
	1 Environment Agency		It is worth noting that although such additions do not increase overall roof area and thus do not increase surface water runoff, such use for the roof void often increases bed numbers and thus pressure on the foul sewer network. We would advise that the opportunity should be taken to put down pipes to water butts, and change any surface water going to a combined system to SuDS where possible or, if not, attenuate surface water on site to offset the increase in sewer use and not worsen water quality issues.	This has been included in the new flood risk and drainage section in chapter 1,
<b>Question 5 regarding the additional guidance on</b>	8 Individual	Agree	Green roofs should be encouraged on flat roof dormer extensions	Environmental performance and reduced run off included in the expanded sustainability section in chapter 1. The benefits of green

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
roof size and shape, balconies and roof terraces				roofs have also been added to ecology section in chapter 9.
	12 Individual	Disagree		N/A
<b>CHAPTER 8: DETACHED GARAGES, OUTBUILDINGS AND BOUNDARIES</b>				
	1 Environment Agency		With all structures covered by chapter 8 it is worth noting that where gardens adjoin a watercourse, a buffer with no structures may be required to allow access to the watercourse. For a fluvial main river this distance is 8m but for a tidal main river the distance is 16m.	This detail has been included in the new flood risk section in chapter 1.
			<b>Para 8.3</b> We recommend that an additional point is added to paragraph 8.3 highlighting that ancillary out-buildings should be located outside the flood zone wherever possible and any that need to be located within the flood zone should not include ground floor sleeping accommodation.	Referred to in new flood risk section in chapter 1, which includes the link to standing advice.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			<p><b>Para 8.5</b> We recommend that additional design details text is included after paragraph 8.5 regarding making them flood resilient and ensuring that the surface water from new building roofs goes to water butts and soakaways rather than into the combined sewer system.</p>	Referred to in new flood risk section in chapter 1.
			<p><b>Para 8.6</b> We advise that paragraph 8.6 include that new driveways should be permeable wherever possible and any that have to be impermeable should drain to soakaways not the combined sewer.</p>	This has been added.
			<p><b>Boundary treatments (paragraphs 8.10-8.12)</b> it should be noted that these are an opportunity to incorporate PFR through flood proof gates, etc.</p>	Reference to property flood resilience has been included in the new flood risk section in chapter 1, and General Principle 10 – integrated design.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
<b>CHAPTER 9: OTHER RELEVANT INFORMATION</b>				
	1 Environment Agency		It is good to see that with regard to <b>ecology paragraph 9.9</b> encourages the incorporation of small-scale opportunities for biodiversity enhancements, including the use of SuDS. As noted elsewhere, there are benefits to the water environment of redirecting surface water from the sewer network to onsite SuDS.	Thank you for the comment. You will note this has also now been strengthened throughout the SPD as well.
			We are pleased to see that <b>paragraph 9.12</b> refers householders to our Flood Risk Standing Advice. However, additional text could be included here highlighting that any new roof area or hard surface should avoid being drained to the combined sewer. Instead, these areas should be drained sustainably to a soakaway and/or use devices such as water butts wherever possible to help both water efficiency and water quality.	This has been expanded on in the new flood risk and drainage section in chapter 1.



Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			It should also include that extensions and alterations are an opportunity to consider and include PFR measures for those properties already in the flood zone. There should be guidance on this within the SPD especially for those properties in conservation areas and what types of PFR design and materials will be acceptable.	Property flood resilience has been included in the new flood risk section in chapter 1, however the SPD cannot go into detail, particularly regarding heritage assets, as what may be acceptable will be specific to each proposal.
	5 Devon Wildlife Trust		<p><b>Ecology</b></p> <p><b>Paragraph 9.8</b> states that a bat survey will be required in certain circumstances. No account is taken of the potential for the presence of nesting birds within the structure. A sentence is required which states that assessment of the building for nesting birds is required prior to commencing works or that works are undertaken outside of the main bird breeding season of March to August (inclusive). This is to ensure compliance with the Wildlife and Countryside Act 1981 (as amended).</p>	Additional text added on nesting birds in the ecology section in chapter 9.

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			<p><b>Paragraph 9.9</b> states that 'Exeter City Council encourages householders to incorporate small scale opportunities for biodiversity enhancement in their proposals.' We would urge the LPA to adopt higher aspirations than to merely 'encourage' opportunities for biodiversity enhancement.</p> <p>This is to ensure compliance with NPPF para. 180. The inclusion of swift bricks and bat boxes within all extensions should be mandatory. The provision of safe routes for hedgehogs between different habitat areas should be mandatory.</p>	<p>The SPD is unable to require biodiversity enhancement as this would be considered a new policy rather than supplementary to an existing policy, including the requirements of NPPF para 180 in relation to householder applications. The SPD does suggest these issues be considered in the design process and this has been strengthened in the update.</p>
<b>ADDITIONAL COMMENTS</b>				
	17 Individual		<p>The SPD must be clear that planning permission is needed when an extension does not have permitted development rights.</p>	<p>This is included in sections 1.4 and 1.5 in the introduction which also briefly explains permitted development rights. It is also reiterated at various points throughout the document that the SPD refers to proposals falling outside of permitted development.</p>

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
	18 Individual		We are currently involved in building an extension and we needed a Party Wall Agreement with our neighbour. Our neighbour is a council tenant and therefore the agreement is with East Devon County Council. However, the process for this was unclear and we ended up having to pay double the cost because we had to have our own party wall surveyor and also pay the EDCC Surveyor. Later we learned that if the process had been done differently we would have only needed to pay for one party wall surveyor. This seems patently unfair and information about this should be publicised clearly.	A section on 'other permissions separate to planning permission' has been added to chapter 1 of the SPD and refers to the need to consider party wall agreements, and a reminder that these lie entirely separate to planning permission.
	19 Individual		<p>More support for householders wishing to make improvements that would support sustainable travel, such as cycle parking storage options. Current planning guidance makes it easier to tarmac a garden to park vehicles than installing a cycle shelter for bikes.</p> <p>Restrictions for alterations that would have a negative ecological impact, such as tarmac driveways or replacing lawns with artificial grass, which results in both habitat loss and a reduction in permeable surfaces, which increases surface run off and risks of flash flooding.</p>	<p>This comment largely relates nationally set permitted development rights. The SPD and the Council's Residential Design Guide detail when cycle storage provision will be supported.</p> <p>The value of front gardens to townscape, biodiversity and run off / permeability has been added to the gardens section (paragraphs 3.13-3.15), as well as raised in the new flood risk and drainage section in chapter 1.</p>

Chapter / Consultation question	Individual / Organisation	Agree / Disagree	Response	Comment
			More support for rewilding efforts.	The SPD has expanded text and strengthened support for biodiversity, environmental performance, and ecology throughout the document during this update.
	21 National Highways		No comment	N/A
	22 Historic England		No comment as not LBC specific	N/A

# Householder's Guide: Design of Extensions and Alterations

Supplementary Planning Document



# Householder's Guide: Design of Extensions and Alterations **Supplementary Planning Document**

Proposed adoption version

January 2024

*\* **Front cover images:** Exeter has a rich and varied palette of existing materials and construction techniques that create a distinctive character and help to establish a strong sense of place*

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## Introduction

- 1.1 Householders' planning applications make up around 20 to 30 per cent of the total dealt with by the City Development team at Exeter City Council. Our planning officers have a responsibility to ensure that proposals do not harm the living conditions of neighbours and that through good design, they have a positive impact on Exeter's environment and its streetscapes.
- 1.2 This guide sets out in a clear and structured way the principles that will enable your planning application for changes to your house to be approved. It is also a valuable tool to ensure design quality in the city.
- 1.3 This document is principally designed for applicants submitting planning applications. If you are applying for Listed Building Consent (LBC), which is required when making either internal or external alterations to a listed building, we recommend you seek further advice from the City Development team.

## Permitted development

- 1.4 'Permitted development rights' enable certain extensions, alterations, and outbuildings to be constructed without planning permission. The allowances and limits provided by permitted development rights are set nationally. The [Planning Portal](#) website provides a wealth of information including an interactive tool that gives clear guidance on what you can do to your house without the need for planning permission, it also sets out the limitations.
- 1.5 Not all dwellings have permitted development rights. It is important that this is checked and understood when you are intending to make alterations to your house, to ensure the works are lawful. Flats do not benefit from permitted development rights. Whether your house has permitted development rights will depend on the history of the building, its location and whether it is listed or in a conservation area, for example. In some parts of Exeter, the permitted development rights have been removed or restricted to protect the local character.
- 1.6 For further information visit: [Do I need planning permission? - Exeter City Council](#).

## Pre-application advice

- 1.7 Exeter City Council offers a pre-application advice service to householders considering an extension or alterations to their property or a property not yet owned. The aim is to allow planning officers to identify any problems in advance and suggest changes to increase the likelihood of planning approval.
- 1.8 For further information and to submit a pre-application enquiry online visit: [Planning pre-app advice - Exeter City Council](#).

## Planning applications

- 1.9 Planning applications are made by submitting forms, specific plans and annotated drawings drawn to scale, any other supporting information and documentation necessary to process the application. The Council has a legal duty to ensure that planning applications contain all the statutorily required information to ensure they are valid, and that members of the public are able to understand, examine and comment on the submitted information.
- 1.10 Plans submitted with a planning application will be published on the Council's website, and it will help your application if these plans represent your proposal as clearly and accurately as possible.
- 1.11 The requirements to ensure that an application is valid can be found here: [Apply for planning permission and other consents - Exeter City Council](#) and includes the [Local List](#) information requirements for planning applications under 'information you will need to provide' bullet point. It is essential to check this link prior to submitting a planning application as there may be additional documentation to submit that is specific to your site or proposal, such as a design and access statement, or flood, heritage, ecology or tree assessment. However, most householder planning applications will require the following as a minimum:
- **Site location plan:** to identify the exact location of the site, and the relationship of the proposal with the site/property boundary. To comply with Government requirements this plan must meet the following criteria. Compliant plans be purchased online.
    - Use an up to date base map.
    - At an identified standard metric scale with the scale identified.
    - Show the direction north.
    - Outline the site boundary in red. This must show the application site boundaries and all land necessary to carry out the proposed development.
    - Any other land owned by the applicant that is close to or adjoining the site needs to be outlined in blue.
    - Identify sufficient adjoining or nearby roads and/or buildings to ensure the exact location of the site is clear.
  - **Any plans, drawings or information necessary to clearly describe the development.** This is likely to include existing and proposed elevations and floorplans. All plans and drawings need to be drawn to an identified scale and show the direction of north.
  - **Completed planning application form:** This must be the correct form for the type of application, such as the 'householder planning permission' form. The ownership certificates and agricultural land declaration section must be complete. Application forms are available through the Planning Portal either as part of the [online application](#) process, or as [downloadable forms](#).
  - **The appropriate fee paid:** In most cases when submitting a planning application there will be a fee to be paid. A missing or incorrect fee will delay the processing of your application. The Planning Portal keeps an up to date list of fees and provides a fee calculator tool: [What it costs - How to apply - Planning Portal](#).
- 1.12 **Consulting neighbours:** Applicants are advised to talk to neighbours to explain their proposals before submitting a planning application. Consulting neighbours at an early stage can ease the formal consultation process that will follow and therefore save time and expense later on by avoiding the need for plans to be revised.

- 1.13 **Changing proposals:** A new application is likely to be required for changes to an approved design if it will result in different dimensions, external appearance or materials. Please submit revised plans to us and we can advise if the changes would be considered a 'non-material amendment' or require a new planning application.

## External works

- 1.14 External works such as pergolas, decking, patios, boundary walls or fences often require planning permission. Please use the [Planning Portal interactive tool](#) as a guide to determine if planning permission is required. Or refer to the Planning Portal's common project guide to find out more about your proposed project: [Common projects - Planning Portal](#).
- 1.15 It is considered that boundaries, such as fences and walls, should be carefully designed to contribute to the local distinctiveness of the area. See Section 8 for further advice on boundaries.

## Sustainability

- 1.16 The City Council has declared a Climate Emergency and pledged to work towards creating a carbon-neutral city by 2030. We have adopted the [Net Zero Exeter 2030 Plan](#), which sets out what Exeter will need to put in place to be net-zero carbon by 2030.
- 1.17 Building an extension is an opportunity to improve your home's environmental impact including considering climate resilience, water use and reuse, energy consumption, reducing water runoff, and protecting and enhancing biodiversity. We will give merit to proposals that enhance environmental performance.
- 1.18 Many domestic renewable energy projects fall within permitted development. However, if the project involves a listed building or is within a conservation area, permitted development may not apply and planning permission and/or Listed Building Consent may be required. Please use the links provided below for more information on home electric vehicle (EV) charging points, common energy generation and micro-renewable energy projects such as solar photovoltaic (PV) panels, micro-wind turbines, ground and air source heat pumps and biomass technology:
- [Common projects - Planning Portal](#)
  - [Home energy generation - Planning Portal](#)
  - Sections 6.11 – 6.15 of this SPD for more information on solar photovoltaic (PV) panels falling outside of permitted development.
- 1.19 The Energy Saving Trust can provide further information about ways to reduce energy use at home: [Energy advice for your home - Energy Saving Trust](#).

## Flood risk and sustainable drainage

- 1.20 Increasing flood risk is one of the most high-profile consequences of climate change. It is vital that flood risk is considered at an early stage in the planning process. Many homes in Exeter are located in areas at risk of flooding. For example, large parts of St Thomas and Alphington are within a flood zone. You can check if your home is at risk from flooding and which flood zone it is in by using the [flood risk map for planning](#).

- 1.21 The Environment Agency provides additional advice if you are extending your home when you live in an area that may flood: [Environment Agency's advice for minor extensions](#).
- 1.22 Householder planning applications located within Flood Zones 2 and 3 will require a Flood Risk Assessment to be submitted. Please refer to the [Local List](#) information requirements for planning applications under the 'information you will need to provide' bullet point on [Apply for planning permission and other consents - Exeter City Council](#). If your home is located within a flood zone, it is advised that you seek advice from a specialist.
- 1.23 Ancillary outbuildings located within areas of flood risk should not include ground floor sleeping accommodation.
- 1.24 A Flood Risk Assessment will need to state levels in relation to Ordnance Datum (the height above average sea level) and ensure the proposed floor levels are either no lower than existing floor levels or 300 millimeters (mm) above the estimated flood level. Flood resistant and resilient measures will also need to be included showing how the property would be protected to at least 300mm above the estimated flood level.
- 1.25 You will also need to show how you're going to ensure the development is not flooded by surface water or groundwater. This could be through:
- Diverting water away from buildings but safely managing it within the site; or
  - Raising floor levels above the estimated flood depths of surface and groundwater flooding.
- 1.26 For further advice on property flood resilience, please use the following links:
- [Property Flood Resilience | The Flood Hub](#)
  - [What is Property Flood Resilience? – BeFloodReady](#)
  - [Property Flood Resilience Funding Scheme - Flood Risk Management \(devon.gov.uk\)](#)

### **Works within or near to a watercourse**

- 1.27 No building works should take place within 8m of a watercourse. If you need to carry out work in, over, above or within 8m of a Main River or Flood Defence, then you may need to apply for a [Flood Risk Activities Permit](#) from the Environment Agency. The [Statutory Main River Map](#) and [flood map for planning](#) will provide help finding out about designated main rivers and flood defences in your area.
- 1.28 An Ordinary Watercourse is defined as a watercourse that is not a Main River, and includes streams, drains and ditches, and passages through which water flows. Works affecting an Ordinary Watercourse may require consent from Devon County Council. You can find further information on [Devon County Council's land drainage consent webpage](#).

### **Sustainable Drainage (SuDS)**

- 1.29 Approaches to managing surface water which take account of water quantity, water quality, public amenity and biodiversity issues are collectively referred to as Sustainable Drainage Systems (SuDS). Householder development can cumulatively affect flood risk by increasing demand on surface water sewers and can contribute to reducing flood risk by ensuring hard surfacing is made permeable and implementing SuDS systems rather than connecting to the sewer.

- 1.30 SuDS systems are more sustainable than conventional drainage methods because they:
- Manage runoff volumes and flow rates, reducing the impact of development on flooding.
  - Protect or enhance water quality.
  - Are sympathetic to the environmental setting and the needs of the local community.
  - Provide a habitat for wildlife in urban watercourses.

1.31 SuDS should be provided for all proposals where there is an increase in impermeable area, where surface water cannot freely drain into the ground, such as an increased area of roof, driveway or paving. The different types of features that can easily be incorporated to all properties and be used for extensions and other householder development include permeable paving, rainwater harvesting and water butts, rain gardens, green roofs, living walls, ponds, filter trenches. This is even more critical in areas at risk of flooding.

1.32 Surface water should be disposed according to the following hierarchy as far as possible:

*Most sustainable*

- Rainwater re-use (rainwater harvesting/greywater recycling).
- An adequate soakaway or other infiltration system.
- To a surface water body (e.g. an ordinary watercourse).
- To a surface water sewer, highway drain, or other drainage system.
- To a combined sewer.

*Least Sustainable*

1.33 For further advice, please use the following links:

- [Delivering SuDS \(susdrain.org\)](http://susdrain.org)
- [Green Roofs | Green Roof Organisation](http://GreenRoofs.org)
- [UK Rain Gardens Guide, managing water in our towns and cities \(raingardens.info\)](http://raingardens.info)

## Crime prevention

1.34 It is essential to consider the impact that your proposal may have on the security of the original house and the neighbouring properties at an early stage. Security measures should be unobtrusive and designed as an integral part of the overall proposal. Opportunities to break in, such as drainpipes and flat roofs providing easy access to first-floor windows, should be avoided. Front doors should be visible from the street to prevent potential intruders from being hidden from view. Good natural surveillance from within the property should also be provided.

1.35 Security advice can be sought from Devon and Cornwall Constabulary. For further information visit: [Protecting your home from crime | Crime prevention | Devon & Cornwall Police \(devon-cornwall.police.uk\)](http://Protecting your home from crime | Crime prevention | Devon & Cornwall Police (devon-cornwall.police.uk)).

## Other permissions separate to planning permission

### Building Regulations

- 1.36 Irrespective of whether you require planning permission, you may need separate Building Regulation approval. This is to check the work you're doing meets certain safety and environmental standards that required by law. We advise early contact with Exeter City Council Building Control to establish likely requirements, costs and timescales.
- 1.37 For further information, visit: [Building regulation approval - Exeter City Council](#).

### Party wall agreements

- 1.38 Party wall agreements are different from planning permission or building regulations approval. You must tell your neighbours if you want to carry out any building work near or on your shared property boundary, or 'party wall', in England and Wales. For further information visit: [Party walls and building work - GOV.UK](#).

### Restrictive covenants

- 1.39 A restrictive covenant is a private agreement between landowners where land use is restricted in some way. Once agreed, restrictive covenants run with the land, and are placed in the title deeds to the property. When a property is on land with a restrictive covenant, even if planning permission has been sought and building regulations have been complied with, a homeowner could still breach a restrictive covenant. For further information visit: [Restrictive Covenants - GOV.UK](#).

## 2. Policy Context

- 2.1 This guide is one of a series of Supplementary Planning Documents (SPDs) that provide more detailed advice on planning policies. This Householder's Guide: Design of Extensions and Alterations SPD amplifies current Local Plan First Review 1995-2011 design guidance policies DG1 and DG4 (see box for policy wording) and, together with the [National Planning Policy Framework](#), forms the basis for Exeter City Council's determination of planning applications. The objective of the Local Plan First Review 1995-2011 design guidance policies is to promote good design in all development proposals.
- 2.2 This Householder's Guide: Design of Extensions and Alterations SPD is likely to need updating once the emerging Exeter Plan, the new Local Plan for Exeter, is adopted.
- 2.3 This SPD provides further advice on the design of householder extensions and alterations as these, individually and cumulatively, can significantly impact townscape and living conditions. No proposal is too small to have an impact, and Exeter City Council requires all applications to achieve high standards of design and living conditions. Applicants are advised to appoint an architect or other appropriately qualified professional to carry out the design work.
- 2.4 Many places and streets in Exeter are designated as 'conservation areas', where additional policy and legal protection exists to help conserve and enhance the character and appearance of these historic areas.
- 2.5 There are also a number of well-designed areas of housing within the city that have a strong, distinct character, which include designed open amenity areas and public spaces. Examples include the post war housing around Wonford including Burnthouse Lane and Rifford Road areas, and newer developments at Gras Lawn and Wyvern Barracks either side of Barrack Road. These unique characteristics should be protected, and further guidance is provided in this document.



## Exeter Local Plan First Review 1995-2011: Design guidance policies

### Policy DG1: Development should

- a) Be compatible with the urban structure of the city, connecting effectively with existing routes and spaces and putting people before traffic;
- b) Ensure that the pattern of street blocks, plots and their buildings (the grain of development) promotes the urban character of Exeter;
- c) Fully integrate landscape design into the proposal and ensure that schemes are integrated into the existing landscape of the city, including its three-dimensional shape, natural features and ecology;
- d) Be at a density that promotes Exeter's urban character and which supports urban services;
- e) Contribute to the provision of a compatible mix of uses that work together to create vital and viable places;
- f) Be of a height that is appropriate to the surrounding townscape and ensure that the height of constituent parts of buildings relate well to adjoining buildings, spaces and human scale;
- g) Ensure that the volume and shape (the massing) of structures relate well to the character and appearance of the adjoining buildings and the surrounding townscape;
- h) Ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape;
- i) Use materials that relate well to the palette of materials in the locality and reinforce local distinctiveness.

## Exeter Local Plan First Review 1995-2011: Design guidance policies

### Policy DG4: Residential development should:

- a) Be at the maximum feasible density taking into account site constraints and impact on the local area;
- b) Ensure a quality of amenity which allows residents to feel at ease within their homes and gardens;
- c) Ensure that the boundaries of private rear gardens facing public places are designed to make a positive contribution to the townscape;
- d) Where front gardens are included, provide enclosure to create defensible space.



## 3. General Principles

- 3.1 All extensions should follow the twelve General Principles and additional guidance in this section.
- 3.2 Further specific advice relating to particular types of extension can be found in separate chapters. Planning applications which follow the General Principles outlined in this document will generally be successful, and the time taken to achieve a consent will be minimised.

### General Principles

#### 1. Use

Extensions should not be designed or used as separate residential units or businesses.

#### 2. Street scene

Extensions should respect existing building lines, the pattern of buildings in the street and the spaces between them. Extensions should not project forward of the front main building line, nor cause terracing\* or contribute to creating terracing.

*\*Terracing refers to two-storey side extensions which result in an unacceptable reduction in width or total loss of the gap between properties - creating the impression of a continuous building frontage.*

#### 3. Natural light and outlook

Extensions should not adversely affect the natural light and outlook enjoyed by neighbours.

#### 4. Privacy

Extensions should be designed to minimise overlooking into neighbouring properties.

#### 5. Scale and massing

Extensions should be subservient\* to the original house and be carefully composed with sympathetic proportions.

*\*Subservience means that the size and proportion of an extension allows the main house to remain the dominant feature.*

#### 6. Roofs

Roofs should match the main roof in terms of shape, pitch and materials. The ridges or the highest rooflines should be set lower, and the eaves-line should be no higher than that of the main roof.

#### 7. Architectural details

Architectural details of the main building should be protected and repeated in the extension design.

## General Principles

### 8. Materials

Exterior materials, and the way they are used (e.g. coursing and pointing, jointing and fixing), should generally match the original house.

### 9. Garden Space

Proposals should normally ensure that 55 square metres of private useable garden space\* remain after construction. Where gardens are currently less than 55 square metres, an extension may not be permitted.

*\* 'Useable garden space' is land under the occupier's exclusive control within the dwellinghouse's curtilage. It only includes land that has been adequately screened, usually to the rear and side of the property, and excludes driveways. The minimum area is generally 55 square metres, please see Chapter 7 of the [Residential Design Guide SPD - Exeter City Council](#) for a full explanation of the requirements. The area may reduce for smaller dwellings but might need to increase for gardens with poor orientation.*

### 10. Integrated design

All elements of the proposal, including landscape works, sustainable drainage systems, flood resilience measures, bin and bicycle storage and security, should be considered and designed as part of the overall scheme from the outset.

### 11. Landscape

Extensions should be designed to minimise the impact upon existing soft and hard landscape features that positively contribute to local character, biodiversity and appearance e.g. mature planting, trees, and boundary treatments.

### 12. Security

The security of the extended and adjoining properties should not be prejudiced by the design of extensions. Security measures should not harm the established character of the street and the original house.

## Site and design considerations

- 3.3 This document cannot cover every challenge, particularly as each proposal is different. It is therefore vital to consider all the options thoroughly at the design stage in order to produce and submit the most appropriate design solution. When looking to extend or alter your home some locations or areas of the house can be more suitable to extend than others. For example, proposals that retain existing open space as much as possible and are located at least 8 m away from water courses have a greater impact in terms of reducing flood risk and impacts on biodiversity. Or ones that locate extensions where there is most solar gain, i.e. facing south westerly, will help to increase energy efficiency and reduce heating costs in the long term.

- 3.4 Some sites may need specific solutions which do not fully comply with certain General Principles. **Where the site/design appraisal suggests a proposal that does not adhere to the General Principles within this document, a complete justification of the design approach will need to be provided in a design and access statement.**
- 3.5 Each application will be considered on its own merits. Existing extensions of poor quality should not be taken as precedents for new proposals.

### Contemporary design

- 3.6 Exeter City Council does not wish to restrict high-quality creative designs and welcomes appropriate innovation. It will support contemporary design, provided that it fits in well with the street scene and responds well to all other planning considerations. For some proposals to extend homes, there may be scope for an innovative use of external materials, (including those that are more energy efficient or have low embodied carbon), although these would still be expected to harmonise with the host building.
- 3.7 Where a contemporary design is proposed, an application should be accompanied by a design statement justifying the approach taken and explaining how the design, notwithstanding its contemporary approach, adheres to the General Principles outlined within this chapter.

### Relation to site boundaries

- 3.8 No part of an extension, including rainwater goods, canopies and overhangs, should extend beyond site boundaries. If the extension overhangs, the works will no longer be a householder planning application, which is a simplified planning process. In this case applicants should seek prior agreement from the adjacent owner and a full planning application will be required.
- 3.9 Care should be taken when proposing an extension close to a neighbouring property to ensure that properties retain their independent form, and to provide adequate space for future maintenance of the extension including elements such as guttering and aerials.
- 3.10 There is potential for foundations to be built up to the boundary line but, depending upon the technical design of the foundation, the walls which they support might need to be constructed inset (as illustrated in Figure 3.1). Consider other possible technical constraints such as the strategy for rainwater disposal or surface water drainage, which may also need to be accommodated adjacent to the site boundary.

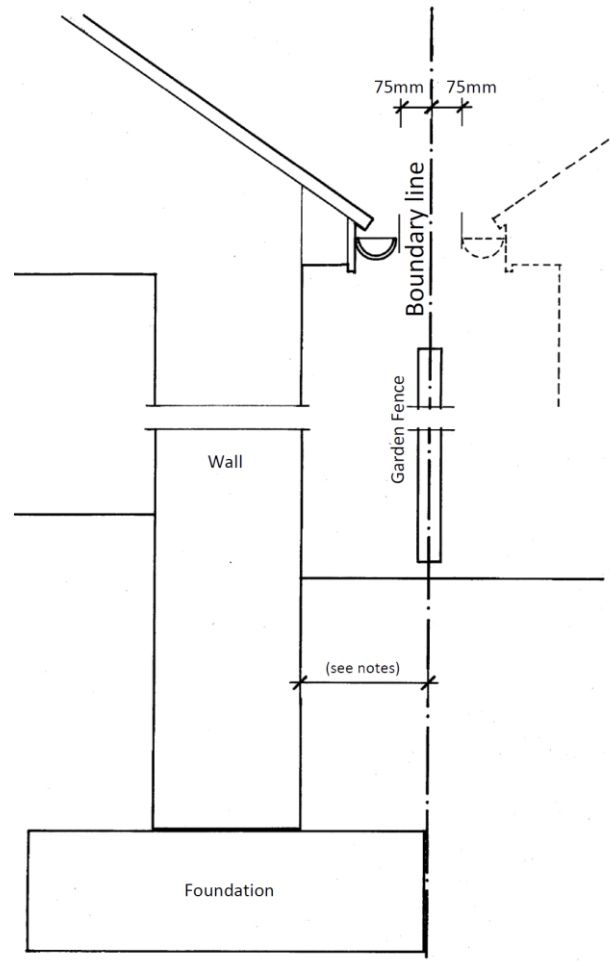


Figure 3.1: Example relationship of development to site boundary

### Access and servicing

- 3.11 An over intensification of the existing residential use through an extension or alteration, may result in an unacceptable deficit in the servicing requirements for the property contrary to Local Plan First Review 1995-2011 policy DG1. This may be in terms of car parking, storage space for cycles, refuse and recycling or even useable external space. This can also impinge on the overall function of the area, affect highway safety and diminish the attractiveness of the neighbourhood.
- 3.12 Converting garages to habitable accommodation can require planning permission, please check the [Planning Portal](#) or discuss with the City Development team if you are unsure whether your proposal needs permission. If the garage is within a flood zone this can be a constraint to conversion to habitable accommodation. This type of development can also result in the loss of a potential on-plot parking space, if this is the case and planning permission is required, Devon County Council as the local Highway Authority, would need to be consulted as part of the planning process to assess any resulting impact upon the surrounding roads.

## Gardens

- 3.13 Gardens are an important characteristic of many parts of Exeter forming an intrinsic part of the identity of a particular locality or neighbourhood. They are important for the health and wellbeing of households. They add to the biodiversity, forming an extensive network of habitats and wildlife corridors throughout the city and their importance to the diversity and richness of urban landscapes is often overlooked. Gardens provide good sources of food for insects, and for birds. They may include nesting sites for birds, habitats for frogs, toads, slow-worms and hedgehogs, etc and also ponds, attract dragonflies and other aquatic and semi-aquatic insects. In the longer term gardens will be essential to help society adapt to the effects of climate change and allow for the growing of local food. They are therefore a resource to be protected for now and for the future.
- 3.14 Development affecting residential gardens should:
- Ensure that extension and alterations of homes will allow residents, both occupiers and neighbours, to feel at ease within their garden (Local Plan First Review 1995-2011 policy DG4 part b), and meet the standards for space and design as set in principle 9 of the General Principles, and within Chapter 7 of the [Residential Design Guide SPD - Exeter City Council](#).
  - Consider the contribution and value of front gardens to townscape, and all gardens to biodiversity, and natural drainage and decreased surface water run off when a permeable surface.
- 3.15 You must also gain consent from Exeter City Council to fell or prune trees located within a conservation area or protected by a Tree Preservation Order. More information is available in sections 9.6 - 9.7.

## Materials and detailed design

- 3.16 In order to support local distinctiveness and to harmonise with the existing property in line with the General Principles (Section 3), the materials used in an extension should usually match and correspond with those of the host building. This includes the use of string or dental courses, brick patterns and quoins as well as sills, lintels and copings. There are a multitude of different colours, textures and shades of bricks and external finishes, and it is critical to the success of an extension to ensure new external walls match the existing as closely as possible. This will be an important factor within the application and if precise details of the materials proposed are not agreed prior to determination, they may be subject to a condition requiring a separate submission and an additional fee to discharge.
- 3.17 Other architectural details of the host building may be equally important, and an extension should not harm or detract from these. Instead, they should be protected and as appropriate repeated within the extension. Examples include projecting bays, chimneys and special types of window such as oriel or bay windows.
- 3.18 Where it is not possible to replicate the materials of the original building then a clear contrast may be preferable to an approximate match and for a recessed 'shadow gap' or other type of constructional seam to be introduced between 'old' and 'new'. Sometimes glazing can act usefully in this way.
- 3.19 There are also opportunities when choosing materials to reduce carbon by selecting ones that are sourced locally or made from materials that consume or produce less energy in production, and construction. The Council will give merit to these types of materials when they fit in with the host dwelling and the overall design.

- 3.20 The openings in a building are key aspects of the design and visual appearance. It is essential that new doors and windows adhere to the character of the property and general area. Generally, the size, positioning, proportion, shape and materials of existing windows should be repeated in an extension, and this also provides a strong clue as to the appropriate proportion for the extension itself. Recessing of windows i.e. the depth they are set back from the face of the elevation is a key characteristic of many of the older homes within the city. Replacement windows should very closely follow the character of the originals paying attention to their general pattern, means of opening and thickness of frames and glazing bars.
- 3.21 The external insulation of whole existing buildings in order to improve their energy performance is likely to promote lightweight cladding finishes and these may be difficult to reconcile with the established character of a neighbourhood where this is dominated by brick or masonry walls. A highly contrasting render finish is unlikely to be acceptable and tile-hanging or some other form of ceramic or clay-based cladding may be more successful in an area dominated by brick. Consider the textures, rhythms, colours and tones that are present in the building, its setting and the wider context of the site in seeking suitable cladding materials and finishes.

## 4. Rear Extensions

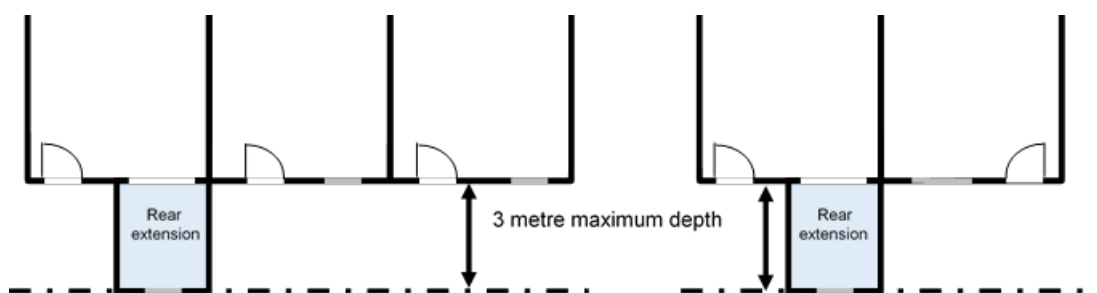
*This chapter should be read in conjunction with Section 3: General Principles*

- 4.1 Rear extensions may not always be in the public view, but it is still important to ensure the design quality is of a high standard so as not to detract from the character of the existing dwelling. A key consideration for both single and two-storey rear extensions is the impact upon the garden and rear external space, and the living conditions of a neighbouring property. This is particularly significant when the extension is near the property boundary.

### Depth

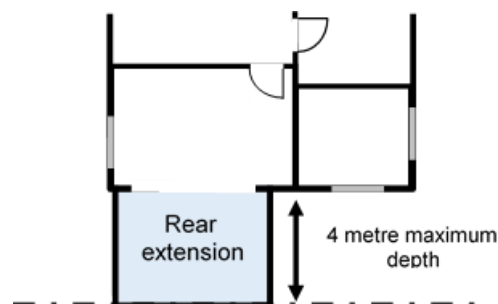
- 4.2 Extensions should be proportionate to the original building and avoid blocking natural light and outlook to neighbouring properties. The following depth limits ensure these requirements will be met (see also Figures 4.1 and 4.2):
- Terraced or semi-detached houses: maximum depth for a rear extension is **3 metres**.
  - Detached houses: maximum depth for a rear extension is **4 metres**.
- 4.3 Depth measurements should be taken from the main rear wall of the original house. If in doubt about measuring, contact the City Development team at Exeter City Council for advice.

#### Terraced and semi-detached houses



*Figure 4.1: Terraced or semi-detached houses: maximum depth for a rear extension is **3 metres**.*

#### Detached houses



*Figure 4.2: Detached houses: maximum depth for a rear extension is **4 metres**.*

- 4.4 Two-storey and first floor rear extensions are more likely to impact neighbours than single-storey ones in terms of natural light, outlook and amenity or living conditions. Therefore, in addition to the depth limits, the commonly adopted "45 Degree Rule" is used to assess proposals of this kind, as indicated in the diagrams below.
- 4.5 In the case of two-storey extensions, neighbouring properties should be clearly shown on both plan and elevation drawings, showing the position and size of their nearest windows in relation to the proposed extension.
- 4.6 Sun path analysis may be helpful to demonstrate the impact of proposals if they do not comply with the 45 Degree Rule, or in more complex situations.

**The 45 Degree Rule – recommended by Building Research Establishment**

1. Draw lines at 45 degrees from the centre of the nearest ground floor habitable room\* windows of adjoining properties on an accurate, scale plan and ensure that the proposed plan fits within the area between the lines and the house (Figure 4.3).
2. Draw lines at 45 degrees from the centre of the nearest ground floor habitable room\* windows of adjoining properties on an accurate, scale elevation and ensure that the proposed elevation fits within the space made by the lines (Figure 4.3).

*\* Habitable rooms include all living rooms, bedrooms and kitchens, but exclude bathrooms, or circulation space.*

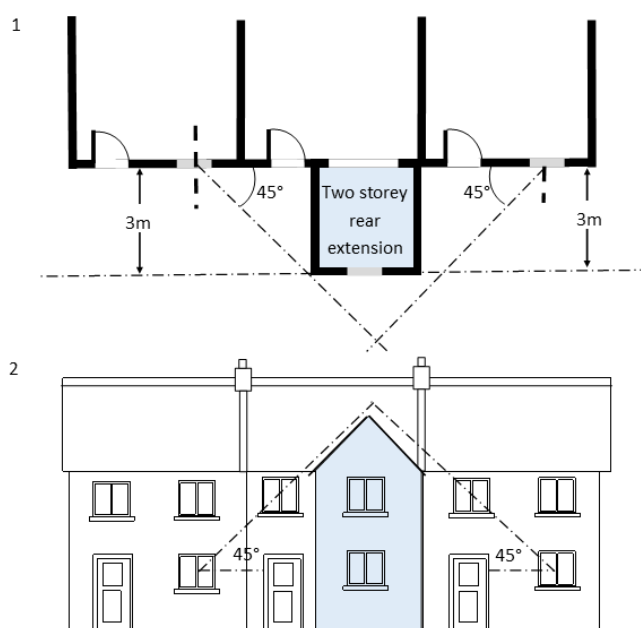


Figure 4.3: The 45 Degree Rule illustrated on a two-storey extension for a terraced property.



## Width

- 4.7 The width of an extension should ensure it remains subservient, in keeping with the house's character and has an acceptable relationship with neighbouring properties. Full-width extensions can be permitted if these aims can be achieved. The side walls of rear extensions should not normally extend beyond the existing side walls of the existing dwelling, as this can impact the character of the property and broader area.

## 'Wraparound' extension

- 4.8 A 'wraparound' extension involves extending to both the side and to the rear of the property, combining them both to create an L shape that wraps around the existing house. These types of extension often require planning permission, as they rarely meet permitted development requirements for extensions. Wraparound extensions often do not look subservient, can harm the character of a dwelling and living conditions of neighbours, and often don't reflect the urban grain of the area. Such applications are unlikely to be granted planning permission but will be considered on an individual basis.

## Privacy and outlook

- 4.9 Windows should not be placed on side walls overlooking neighbouring properties. High level, non-opening windows with obscure glass may be an acceptable solution in certain circumstances.
- 4.10 As outlined in the Local Plan First Review 1995-2011 (section 13.36), proposals for two-storey and first floor extensions should ensure that a minimum back-to-back distance of 22 metres is retained to preserve privacy (Figure 4.4). An extension may not be acceptable where the existing back-to-back distance is less than 22 metres and privacy is a concern.



*Figure 4.4: Back-to back distances: a minimum of 22 metres between the rear walls of the properties should be achieved in the interest of privacy and minimising overlooking.*

- 4.11 In cases of single-storey extensions, the 22m rule may be applied where overlooking occurs: for example, where there is a change in level.
- 4.12 The use of a flat roof as a roof terrace over a single-storey rear extension is likely to harm the privacy of neighbours and will not be acceptable. New balconies to the rear of properties are also unlikely to be acceptable. See Section 7 for more information on balconies and roof terraces.

- 4.13 Residents should be able to enjoy a good quality outlook without adjacent buildings being overbearing. Where habitable room windows face onto a blank or largely blank wall of another building, a minimum distance equal to twice the height of the blank wall (measured from ground floor level to eaves or parapet) must be provided between the two buildings (Figure 4.5).

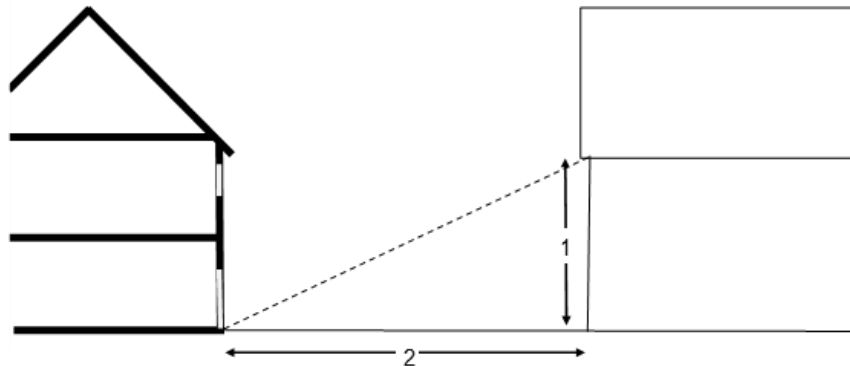


Figure 4.5: The distance between habitable room windows and a blank wall must be a minimum of twice the height of the wall.

- 4.14 Where there is a level difference between the two buildings, the distance must increase (Figure 4.6) or may decrease accordingly.

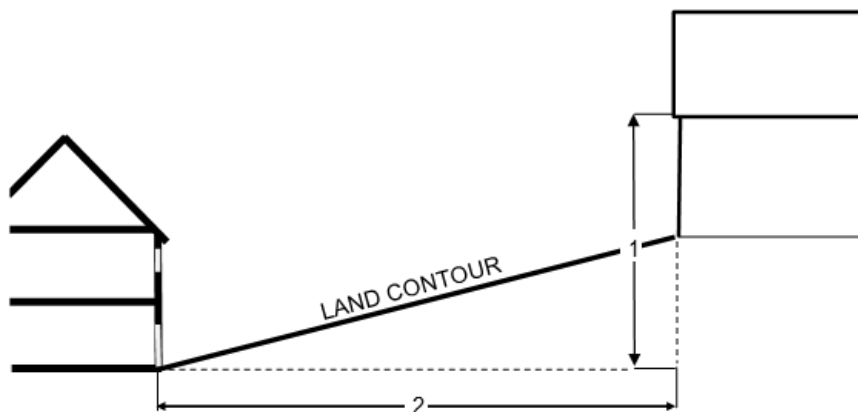


Figure 4.6: The distance between habitable room windows and an elevated blank wall must be a minimum of twice the height of the wall plus the level difference.

## Single-storey rear extension roof height

- 4.15 For single-storey rear extensions, there should be a gap of at least 150mm (about two brick courses) between the highest part of the roof of the extension and the underside of the first-floor windowsills (Figure 4.7). This is visually pleasing and helps preserve the character of the original house. If proposals do not comply, justification should be submitted with the application.



*Figure 4.7: Single-storey extension with 150mm gap between extension ridge and windowsills of the first-floor windows.*

## Conservatories

- 4.16 The criteria for single-storey extensions apply to conservatories. The design may need to include solid walls or fixed obscure glazing to prevent overlooking.

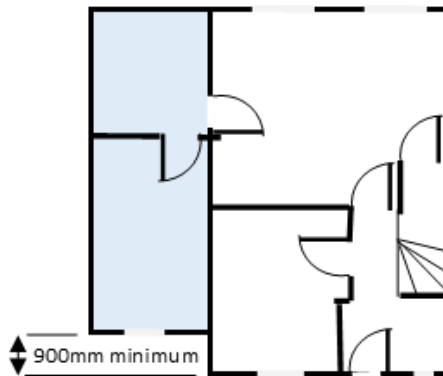
## 5. Side Extensions

*This chapter should be read in conjunction with Section 3: General Principles*

- 5.1 This chapter applies to single and multi-storey side extensions and first-floor side extensions over an existing structure such as a garage or carport.
- 5.2 In conjunction with the General Principles (Section 3), the guidance in this chapter will ensure that proposals preserve the character of the original house and the established street scene and protect the living conditions of the neighbours.

### Position

- 5.3 Extensions should be set back at least 900mm from the front main wall to ensure that the extension will be subservient to the original house (Figure 5.1). This arrangement allows the new additions to be read separately from the old, helping to preserve the established character of the street. Where there is an existing ground floor side extension in line with the principal elevation, the extension should again generally be set back not less than 900mm at the first-floor level. Where the street is characterized by a strong building line, with no setbacks it may be acceptable not to provide a 900mm setback. Side extensions that project forward of the dwelling's front elevation are unlikely to be acceptable.
- 5.4 *Please note: 900mm is in accordance with brickwork dimensions.*



*Figure 5.1: Side extensions should be set back at least 900mm from the front main wall of the house to ensure subservience.*

- 5.5 Single-storey side extensions beyond the rear main wall should comply with the guidance concerning depth for rear extensions outlined in Section 4.
- 5.6 Extensions of two-storey or higher, projecting beyond the rear main wall will not usually be permitted owing to the harm they may cause to the character of the main house, to the established townscape and neighbouring residential amenity.
- 5.7 Attention should also be given to a side extension's proximity to neighbouring boundaries and potential impact on neighbours. Any side extension close to the boundary risks being overbearing or causing overshadowing to the extent that it may not be acceptable.

## 'Wraparound' extension

- 5.8 A 'wraparound' extension involves extending to both the side and to the rear of the property, combining them both to create an L shape that wraps around the existing house. These types of extension often require planning permission, as they rarely meet permitted development requirements for extensions. Wraparound extensions often do not look subservient, can harm the character of a dwelling and living conditions of neighbours, and often don't reflect the urban grain of the area. Such applications are unlikely to be granted planning permission but will be considered on an individual basis.

## Proportion

- 5.9 To ensure an extension is subservient and is of visually pleasing proportions, it should be no more than half the width of the original house (Figure 5.2).

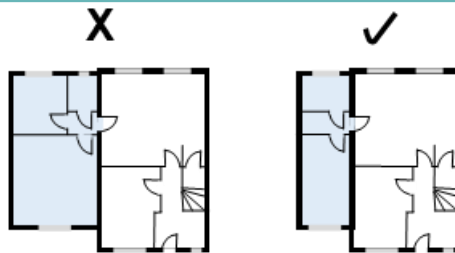


Figure 5.2: Side extensions should be no more than half the width of the original house to ensure subservience and visually pleasing proportions.

- 5.10 Side walls should remain parallel to the original house to ensure the established character of the street and the original house is maintained (Figure 5.3).

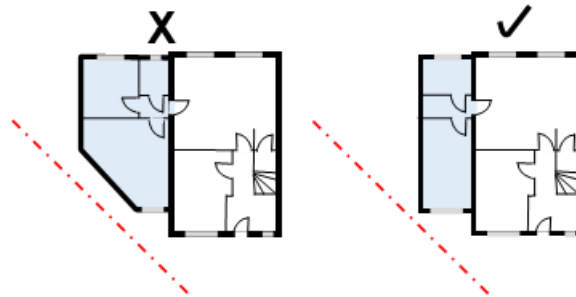


Figure 5.3: Side walls of extensions should remain parallel with the original house.

## Garages and carports

5.11 The criteria for side extensions apply to garages and carports. A 'lean-to' will often be the best solution unless the original house has a flat-roofed design. A lean-to roof may be hipped or vertical (Figure 5.4).

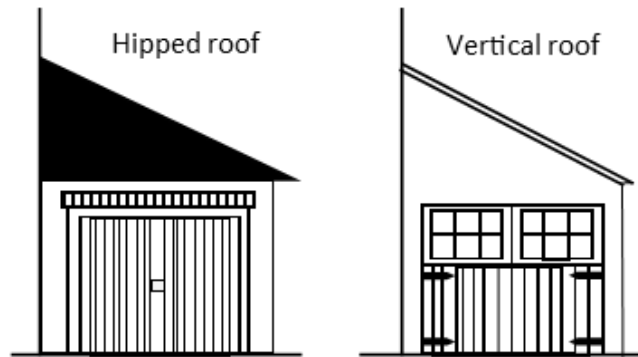


Figure 5.4. Lean-to roofs are considered the best option for a garage side extension, as shown these may be hipped or vertical.

## Terracing

5.12 Careful consideration should be given to the potential for increased massing created by side extensions, particularly at the first-floor level. Infilling the spaces between properties can create an unwanted terracing effect in the street scene (Figure 5.5)

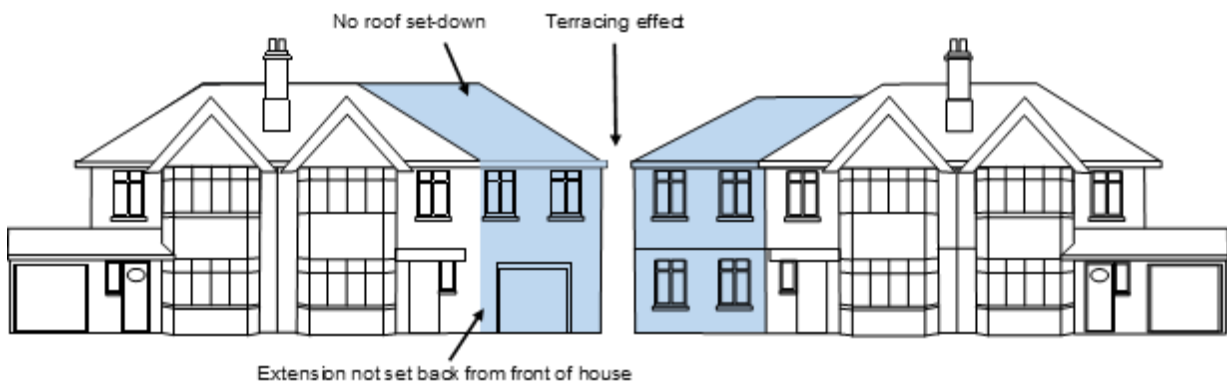


Figure 5.5: Two-storey side extensions can result in the loss of important gaps between buildings, known as the terracing effect.

## Corner plots

- 5.13 A side extension on a corner plot may be visible within two streets and it is important that it is subservient to the host dwelling and is not dominant within either street scene. Extensions should be acceptable if they are set behind the building lines of properties on both streets (Figure 5.6) and adhere to the width and proportion criteria set out in Section 5. There may not always be a clear building line and in such cases the impacts on the street scene will be assessed on an individual basis.

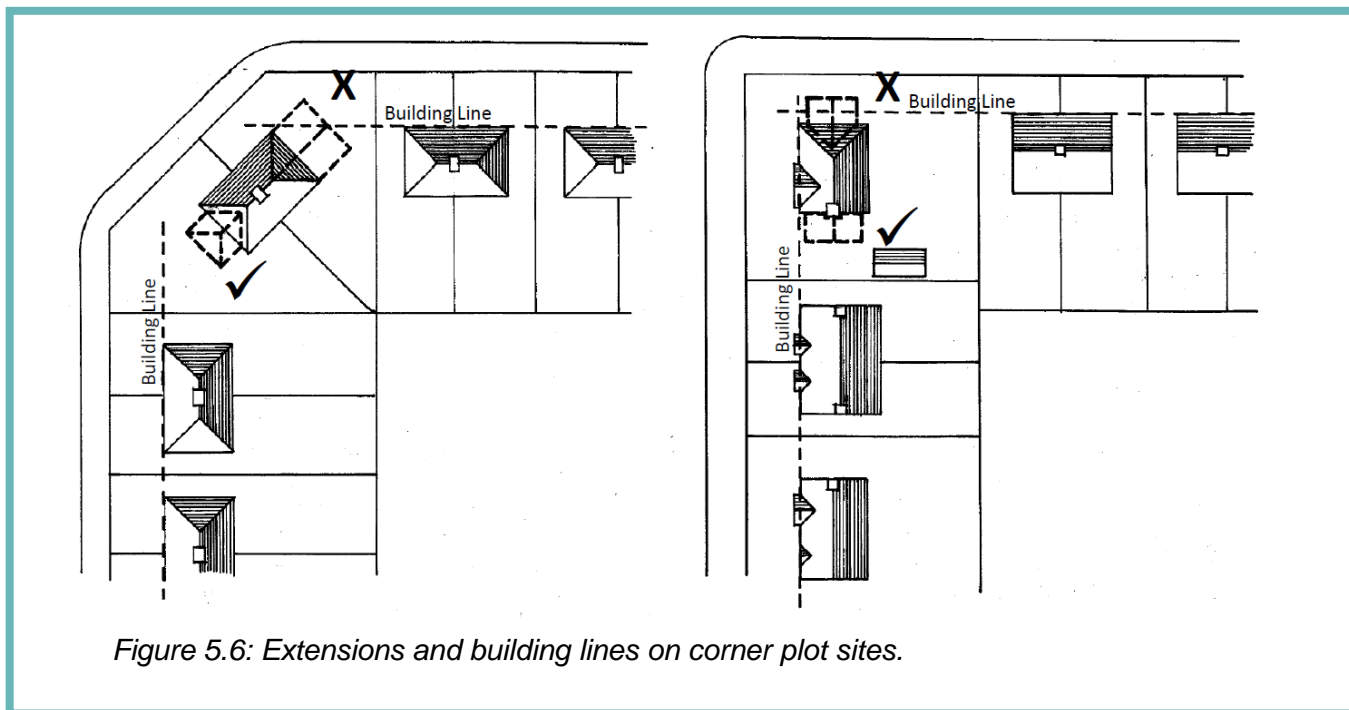


Figure 5.6: Extensions and building lines on corner plot sites.

## 6. Loft Conversions, Roof Lights and Solar Panels

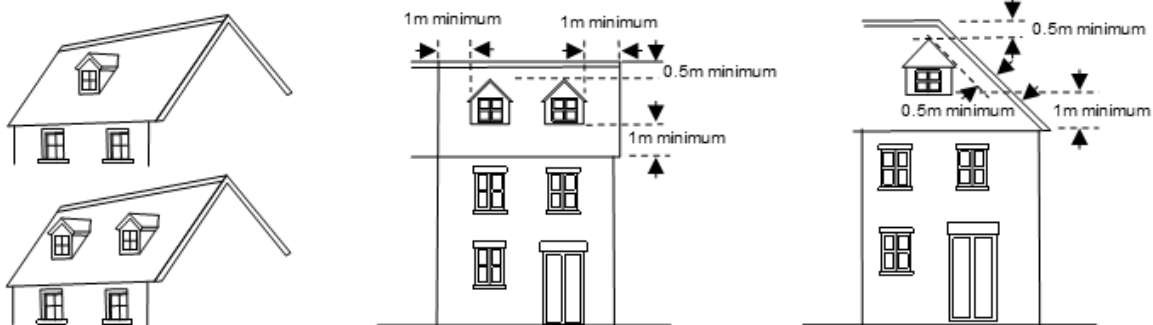
*This chapter should be read in conjunction with Section 3: General Principles*

### Principle and permitted development

- 6.1 Permitted development rights now provide greater scope for the addition of a dormer, that matches the existing roofing material, to the rear elevation of a property, often as part of a loft conversion. This permitted development right does not apply to homes located within a conservation area. To find out whether your home is within a conservation area please use our interactive map [Map of Conservation Areas - Exeter City Council](#). Please visit the Planning Portal for further advice on loft conversions: [Planning Permission - Loft conversion - Planning Portal](#).
- 6.2 When planning permission is required for a dormer, where there is an established townscape that is mainly without dormers, either at the front or rear of the property, proposals will not usually be acceptable. However, there may be greater scope where dormers have become an established part of the townscape.
- 6.3 If a dormer is required to provide headroom rather than just natural light for the proposed accommodation, the proposal is unlikely to be acceptable.

### Position

- 6.4 The following guidelines are provided in relation to the positioning of dormers:
- Dormers should either be located centrally or symmetrically on the roof, or be aligned with the windows below (Figure 6.1 left hand image)
  - Dormers should be set a minimum of 0.5m (measured vertically) below the ridge level, 1m above eaves and 1m from the boundary. For gabled roofs, dormers should be set in a minimum of 1m from the edge of the roof (Figure 6.1 central image).
  - For hipped roofs, extensions should not come within 0.5m of the hip tiles (Figure 6.1 right hand image).



*Figure 6.1: The three diagrams illustrate the advised positioning of dormers:*

- 1) left hand image: within the roof and relative to the windows below;*
- 2) central image: in relation to the ridge and edge of the roof;*
- 3) right hand image: position in relation to hip tiles for hipped roofs.*



## Size and scale

- 6.5 The size of dormers should be kept to a minimum so that the main roof of the house remains the dominant feature. The windows should be smaller than the habitable room windows on the main walls of the house so that the scale and proportions are visually pleasing (Figure 6.2).



Figure 6.2: The dormer's size allows the main roof to remain the dominant feature, and the dormer window is smaller than the window on the floor below.

## Design details

- 6.6 A range of designs of dormer roofs may be acceptable (Figure 6.3). The appropriate design solution should be based on the original house's character and the street scene. Dormer cheeks should be clad in materials to match or complement the main roof.

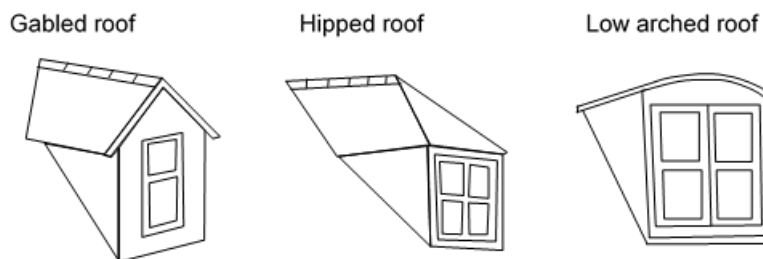


Figure 6.3: Potentially good dormer roof designs include gabled, hipped and low arched roofs.

## Privacy

- 6.7 Where a dormer window or roof light increases the potential for overlooking into the rear of neighbouring properties, planning permission will not usually be granted.

## Roof lights

- 6.8 The positioning of new roof lights within a roof slope should follow the design principles set out for dormers above. Where there are two or more roof lights to be introduced, they should be aligned, and a consistent size will normally create the most satisfactory appearance. Whenever possible, roof lights are best placed in the rear-facing slope so as not to be visible from the public street.
- 6.9 Roof lights that are the sole means of providing natural light to a space will only be acceptable if they are able to also provide a good outlook for occupants, whilst ensuring that overlooking is avoided.
- 6.10 In conservation areas, roof lights will not normally be approved if they result in harm to the character and appearance of the conservation area and therefore will not normally be approved on the front elevation. A rear elevation roof light in a conservation area is more likely to be supported where the visual impact is further reduced by specifying a type that can be fitted flush with the roof finish, sometimes referred to as a 'conservation roof light'. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).

## Solar photovoltaic (PV) panels

- 6.11 In many circumstances, solar panels fixed to the wall or roof of a house are classed as 'permitted development' and do not require planning permission. Use the following link for further advice: [Interactive House – Planning Portal](#).
- 6.12 If the solar panels are to be installed on a listed building or within the grounds of a listed building, Listed Building Consent and/or planning permission are likely to be required. In this instance, contact the City Development team to discuss your proposal.
- 6.13 For solar panels that do need planning permission, we would advise the following:
- Colour and material: choose solar panels that match the colour and material of your roof. Many manufacturers offer solar panels with various frames and cell colour options to blend in with the existing roof.
  - Low-profile mounting: opt for low-profile mounting systems that keep the solar panels closer to the roof surface. This minimises the visual impact.
  - Symmetry and alignment: ensure that the solar panels are aligned symmetrically and evenly spaced. This creates a balanced look and helps maintain the architectural harmony of your roof.
  - Hidden wiring: conceal wiring and connections as much as possible. This can be done by routing cables through the attic or behind walls to maintain a clean and uncluttered appearance.
- 6.14 If your property is in a conservation area, there may be other limits that apply, please check the [Solar panels - Planning Portal](#) for further advice. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).
- 6.15 It is advised that you ensure that your roof can support the weight of solar panels without compromising its structural integrity. Building Regulations will normally apply when installing solar panels on your roof. Please contact Exeter City Council's Building Regulations team to discuss: [Building regulation approval - Exeter City Council](#).

## 7. Roof Extensions and Alterations

*This chapter should be read in conjunction with Section 3: General Principles.*

- 7.1 This chapter applies to roof extensions and alterations, including changes to roof shape, raising of the ridge and the installation of balconies and roof terraces.

### Altering the roof shape

- 7.2 Extensions involving roof alterations should ensure that they would not result in an imbalance between a semi-detached pair of dwellings or a small terrace. Proposals for altering the shape of roofs (e.g. from hipped roof to gabled roof) that result in imbalance would not be acceptable due to their detrimental impact on the street scene (Figure 7.1). Where such works fall under permitted development provisions, then regard to the visual impact on both the host building and its surroundings should still be given. For example, additional accommodation could be provided by a side dormer rather than “gabling off” the hipped end roof. This would leave the form of hipped roof intact along with the symmetry of the pair of houses and so in design terms, it results in a more visually pleasing house.
- 7.3 A well-designed alteration that returns symmetry to the pair may be acceptable.



*Figure 7.1: The hip to gable extension here results in a negative imbalance to the symmetry of the pair of semi-detached dwellings.*

### Raising of the roof ridge

- 7.4 The acceptability of raising the ridge of a dwelling will depend on the area's character and a sympathetic design to respect the scale and general appearance of the street, including its topography.
- 7.5 Raising the ridge of a single property within a terrace or as part of a semi-detached pair is unlikely to be acceptable.
- 7.6 Where additional thermal insulation is proposed to be added to an existing roof then all alternative strategies should be explored before resorting to raising its height. But if this is demonstrated to be necessary then this will be supported providing that very careful detailed design in accord with the General Principles (Section 3) is exercised and the original eaves line is maintained.

## **Additional storeys**

- 7.7 Additional storeys may be permitted on detached properties where they are sympathetically designed and respect the scale, continuity, roofline and general appearance of the street, including its topography.

## **Balconies and roof terraces**

- 7.8 Balconies or raised platforms will be assessed regarding design and impact on residential living conditions, including privacy. In many cases, they can significantly affect a neighbour's privacy and create a sense of overlooking, particularly if they are located where it is possible to look into gardens or windows that previously enjoyed privacy. The presence of balconies and roof terraces may also result in noise disturbance, particularly to nearby windows, and can also be harmful to the appearance of a building. Careful consideration must be given to the location and design of a balcony or a terrace, including any associated balustrades.
- 7.9 Balconies and roof terraces at the front and rear of the building, or any other prominent locations visible from the street, will only be acceptable where they do not harm the appearance of the building and the street scene.

## **Privacy**

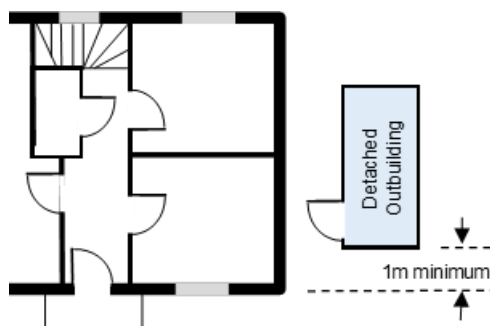
- 7.10 Roof extensions or alterations to include a balcony or roof terrace are unlikely to be acceptable where they are likely to overlook neighbouring properties and gardens.

## 8. Detached Garages, Outbuildings and Boundaries

*This chapter should be read in conjunction with Section 3: General Principles.*

### Location of garages and outbuildings

- 8.1 Detached garages and outbuildings should be set back at least 1m from the front main wall of the house to preserve the character of the street (Figure 8.1).



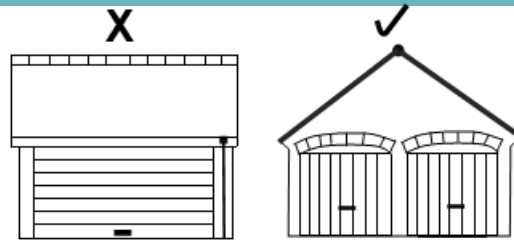
*Figure 8.1: The street's character will be preserved by setting back garages and outbuildings.*

### Subordinate and ancillary outbuildings

- 8.2 Outbuildings should be ancillary in use i.e. intended to be used by those living in the main house, and subordinate in scale to the dwelling.
- 8.3 Outbuildings that would function as new dwellings i.e. include all the facilities for self-contained living (including an opportunity for its own access), or are used as commercial space/premises, or a workshop for trade and employment, would not fall under the definition of a householder development. Such works will need a different type of planning consent to the simplified householder planning consent. The different planning consents are outlined on the Planning Portal: [Consent types - Planning Portal](#).

### Design details

- 8.4 Detached garages and outbuildings should be confined to single storey, so they are clearly subservient to the original house. A garage or outbuilding may not be acceptable where changes in level result in walls significantly higher than the standard domestic single-storey height. Garages should follow the General Principles (Section 3) by respecting the architectural character of the dwelling.
- 8.5 Double garages in conservation areas or associated to a listed building, should be accessed by two separate doors divided by a pier (Figure 8.2). Garage doors can significantly impact the established character of the original house and the street scene. Timber doors vertically rather than horizontally clad are normally the most appropriate design solution across various architectural styles.



*Figure 8.2: Double garages should be accessed by two separate doors divided by a pier if in a conservation area or within the setting/surroundings of a listed building.*

- 8.6 The width of driveways should be kept to a minimum to reduce the impact on the street scene. They should be surfaced in permeable materials that complement the house and its garden. Where permeable materials are not possible, any water run off should drain to soakaways rather than the combined sewer. Enclosure to the street should be maintained by walls, railings, gates or planting (Figure 8.3). Particular consideration will be given to proposals for driveways in conservation areas where there is a need to protect the heritage value of the street scene and the established character of the front boundaries. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).



*Figure 8.3 The design of detached garages and drives should respect the local street scene.*

- 8.7 Any queries regarding dropped kerbs should be directed to Devon County Council as the local Highway Authority which is responsible for alterations to the adopted highway (see Section 9 for more information). If the kerb is on a classified road, planning permission will also be needed.

## Cycle storage

- 8.8 Structures to store cycles in front gardens will usually require planning permission. Exeter City Council will encourage and support cycle storage when appropriately designed. Cycle storage should not dominate the front garden, particularly where it will be prominent in the street scene or affect the setting of heritage assets. Acceptability will depend on the size and position of the storage in relation to the dwelling and the street scene and on the size of the front garden area. Where space is limited, and the storage would be prominent in the street scene, the structure should:
- Be the minimum size required to store one or two bicycles.
  - Be constructed of high-quality materials and colours appropriate to the setting.
  - Be positioned to respect the architectural appearance of the dwelling and avoid visual conflict with features such as windows or window ledges.
- 8.9 Further information on provision of cycle parking can be found in Chapter 6 of the [Residential Design Guide SPD - Exeter City Council](#).

## Boundary treatments (fences)

- 8.10 In terms of their design, Exeter City Council seeks to ensure that private boundary treatments that face public places should provide an appropriate level of security whilst making a positive contribution to the townscape. Close-boarded timber screen fences facing streets and public places will not be acceptable. Enclosure to front gardens should therefore be by walls, railings or hedges in order to create an attractive appearance and provide 'defensible space' (Local Plan First Review 1995-2011 policy DG4 part d) between the dwelling and the street.
- 8.11 Although not a common characteristic of boundaries in the city, planted hedgerows do form a distinctive feature in some neighbourhoods and they have great potential to support and enhance biodiversity. This type of boundary would not need planning permission but may need to be accompanied by a temporary wire fence whilst the hedgerow became established (to contain pets, for instance).
- 8.12 A particular type of boundary treatment may be one of the defining characteristics of a conservation area. Maintaining and enhancing an existing pattern and means of enclosure may be an important consideration in a conservation area. To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).

## 9. Other Relevant Information

### Conservation areas and listed buildings

- 9.1 Pre-application advice should be sought for proposals affecting conservation areas and listed buildings. Please visit [Planning pre-app advice - Exeter City Council](#).
- 9.2 To find out whether your home is within a conservation area please use our interactive map: [Map of Conservation Areas - Exeter City Council](#).
- 9.3 All extensions, and many alterations, to listed buildings require 'Listed Building Consent' which is a separate process to obtaining planning permission. For further information visit: [Listed buildings - Exeter City Council](#).
- 9.4 For further information on undertaking work in conservation areas, please visit [Conservation areas - Other permissions you may require - Planning Portal](#).
- 9.5 For further information on alterations or extensions to listed buildings, please visit [Listed Buildings - Other permissions you may require - Planning Portal](#).

### Archaeology

- 9.6 On infrequent occasions, development can affect archaeological sites. Separate consent is required for this. Groundworks within central Exeter and in other historic areas can also affect buried remains. Please see the guidance on archaeology and development in Exeter: [Archaeology and Development SPG - Exeter City Council](#) or seek pre-application advice.

### Trees

- 9.7 Trees within conservation areas and trees protected by Tree Preservation Orders cannot be felled or pruned without the consent of Exeter City Council. To check whether any trees within or adjacent to your site are protected, and how to apply for works to a protected tree, please visit our website: [Tree Preservation Orders - Exeter City Council](#).
- 9.8 Important trees need to be protected during construction. Exeter City Council has produced [Trees and Development SPD - Exeter City Council](#) to assist householders and developers in retaining trees successfully.

### Ecology

- 9.9 Construction, demolition, extension or conversion proposals could unlawfully affect a bat roost in a building. More information about bats in buildings and their legal protection can be found here [Bat Conservation Trust](#). Exeter City Council will expect a bat survey to be submitted with a planning application in certain circumstances. For further information refer to the [Local List](#) information requirements for planning applications under 'information you will need to provide' bullet point on [Apply for planning permission and other consents - Exeter City Council](#). Also refer to national advice for further information [Bats: advice for making planning decisions \(gov.uk\)](#).
- 9.10 Certain birds use features within houses while nesting, and it is a criminal offence to intentionally destroy, damage or take an active nest or their eggs. If it is suspected that



nesting birds may be affected by a proposal, a qualified ecologist should be contacted for advice and the information submitted as part of the planning application.

- 9.11 Exeter City Council encourages householders to incorporate small scale opportunities for biodiversity enhancement in their proposals. These might include creating new habitats, enhancing existing habitats, providing green roofs and walls, planting trees or using sustainable drainage systems. Relatively small features can often achieve essential benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different habitat areas.

### **Highways: dropped kerbs, skips and scaffolding**

- 9.12 A dropped kerb, often referred to as a vehicle crossing, is a section of pavement that allows vehicles to cross from the road over the pavement. Typically, these do not require planning consent to be obtained from Exeter City Council. However, dropped kerbs nearly always require a licence to be applied for through Devon County Council before any work is carried out. Further information can be found by visiting: [www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk](http://www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk) and selecting 'Apply for a dropped kerb (vehicle crossing)'.
- 9.13 Skips, scaffolding and the storage of other materials or equipment on the highway, the term highway includes the pavement, nearly always need a licence. This should be applied for through Devon County Council. Further information can be found by visiting: [www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk](http://www.devon.gov.uk/roads-and-transport/make-a-request/devon.gov.uk).

### **Underground services and sewers**

- 9.14 Applicants should consult the relevant bodies, such as South West Water, Wales and West Utilities and Western Power, to avoid building too close to or over underground services such as water, gas and electricity.
- 9.15 Extensions and conversions, whether developed under permitted development or planning permission, are required to abide by the surface water disposal hierarchy, as described within Building Regulations. If a householder's property has an existing connection for their domestic surface water into a public sewer, this does not provide an automatic right to connect into the same sewer with subsequent development.
- 9.16 South West Water provide the following online guidance for householders regarding South West Waters policy in relation to works in proximity to statutory assets including public sewers and water mains, and potential build-overs:
- [Building near a public sewer - South West Water](#)
  - [Building near water mains - South West Water](#)

# Householder's Guide: Design of Extensions and Alterations

## Supplementary Planning Document



### Contact details

Local plans team, Exeter City Council,  
Civic Centre, Paris Street, Exeter, EX1 1JN

01392 265080

[planning.policy@exeter.gov.uk](mailto:planning.policy@exeter.gov.uk)

Please contact us to request this information  
in an alternative format or language.

We consider requests on an individual basis.

## Equality Impact Assessment: Householder’s Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD): Proposed adoption

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

<b>Committee name and date:</b>	<b>Report Title</b>	<b>Decisions being recommended:</b>	<b>People with protected characteristics potentially impacted by the decisions to be made:</b>
Executive: 5 March 2024 Council: 23 April 2024	Householder’s Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD): Proposed adoption	1. That the Executive notes the Consultation Statement, which documents the responses to the consultation on the SPD, attached at Appendix A. 2. That the Executive recommends that Council	Potentially all groups with protected characteristics because the Guide has the potential to impact upon all residents of Exeter. The aim is that the Guide will improve the city for the benefit of all residents

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		approves the adoption of the updated and revised Householder's Guide: Design of Extensions and Alterations SPD attached at Appendix B.	irrespective of protected characteristics.

**Factors to consider in the assessment:** For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** – some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers; asylum seekers).	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Disability:</b> as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.

<b>Protected characteristic/ area of interest</b>	<b>Positive or Negative Impact</b>	<b>High, Medium or Low Impact</b>	<b>Reason</b>
<b>Sex/Gender</b>	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Gender reassignment</b>	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Religion and belief</b> (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual).	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Age</b> (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Pregnancy and maternity</b> including new and breast feeding mothers	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.
<b>Marriage and civil partnership status</b>	<b>Neutral</b>	<b>Low</b>	The document does not include specific policies or guidance regarding this characteristic and therefore no impact is anticipated.

**Actions identified that will mitigate any negative impacts and/or promote inclusion**

None.

Assistant Service Lead: Hayley Stokes

Date: 25 January 2024

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## REPORT TO EXECUTIVE

Date of Meeting: 5 March 2024

## REPORT TO COUNCIL

Date of Meeting: 23 April 2024

Report of: Director Net Zero Exeter & City Management

Title: Tree and Woodland Strategy 2023-33

### Is this a Key Decision?

No

### Is this an Executive or Council Function?

Council

### 1. What is the report about?

1.1 The report provides an executive summary of the new Tree and Woodland Management Strategy, for the consideration of Executive. The public consultation to the strategy took place in 2020, subsequent to which recommendations were applied within the strategy document. The creation of the strategy was approved at Council on the 27 April 2021.

1.2 The Council is one of the largest tree owners in Exeter, and the one organisation that the public see as the guardian of the city treescape, both in its role as landowner and through planning controls. As such, it is the key organisation in developing a framework to protect and sustain the city's trees.

1.3 The Strategy documents best practice in regard to the maintenance and welfare of the Council's tree and woodland estate, and the service currently operates to the principles contained within it. The adoption of the strategy will formalise what has become standard operating procedure, but also provides a vision for the development of Exeter's tree estate.

### 2. Recommendations:

2.1 That Executive notes the report and recommends Council approves the adoption of Tree and Woodland strategy 2023-2033.

### 3. Reasons for the recommendation:

3.1 The strategy formalises and aligns the councils tree management in respect of industry best practice, duty requirements, and the Councils Corporate plan 2022-2026.

### 4. What are the resource implications including non financial resources

4.1 The tree inspection and management regimes have been developed over the last 10 years to the point it provides adequate and proportionate risk management. The current inspections and works revenue budget remain appropriate with an allowance for contract

upgrade, and assuming no significant impact from legislative, work practice, or waste disposal changes.

4.2 Ash dieback continues to present a financial risk with capital costs running between £50,000 to £150,000 per year for the next 5 years or longer (ECC Ash Dieback Action Plan 2019). The budget for 2023-24 stood at c.£302k, it is recommended that the existing capital budget remains in place and is carried forward to mitigate the ongoing impacts of Ash Die Back across the council's tree estate.

4.3 There is insufficient funding within the existing Revenue budget to manage woodlands effectively in line with a rolling management plan. A capital funded Woodland management scheme would enable existing woodlands to be brought into line. However, the council requires a woodland management plan prior to recommending funding considerations. This will be required to evidence the resource and financial needs associated with a cost-effective woodland management programme.

4.4 Arboriculture budgets are as follows:

	Budget 2023-24 £	Budget 2024-25 £	
Pay	133,220	142,890	4.5% pay award (24/25) and additional cost of the 23/24 pay offer
Services	4,550	4,550	
Sub-Contractors	115,780	115,780	
Housing	(39,010)	(45,810)	

## 5. Section 151 Officer comments:

5.1 There are no additional financial implications to consider. The amounts set out in section 4 are already provided for in the budget. Any future requests for funding would have to be taken in line with the Council's requirements to reduce spend over the next three years, and in competition with other critical, unfunded capital priorities.

## 6. What are the legal aspects?

6.1 This report recommends a management strategy in relation to the Council's trees and woodland. Section 5 of the report addresses planning and development aspects.

In particular, Members will note:

6.1.1 Section 197 of the Town and Country Planning Act 1990 which places a duty on local planning authorities to ensure, whenever it is appropriate, that in granting planning permission for development, adequate provision is made through the imposition of conditions for the preservation of planting or trees;

6.1.2 Section 198 of the Town and Country Planning Act 1990 concerning the power of local planning authorities to make Tree Preservation Orders where it is expedient in the interests of amenity in relation to trees, groups of trees and woodlands;



6.1.3 The Town and Country Planning Act 1990 in relation to proposed works to trees in conservation areas;

6.1.4 The Hedgerows Regulations 1997 in relation to the criteria for determining important hedgerows, permitted works, offences, and injunctions under the Regulations; and

6.1.5 The ability of the Council to take remedial action under Part 8 of the Anti-Social Behaviour Act 2003 in relation to high hedges.

## **7. Monitoring Officer's comments:**

7.1 This report raises no issues for the Monitoring Officer.

## **8. Report details:**

8.1 The strategy consultation was released in 2021 outlining the objectives the council was hoping to achieve through the implementation of the strategy. The consultation received 330 responses, and over 300 confirmed that they agreed or agreed strongly with the objectives outlined. There were only 12 negative responses. Where suggestions were made to improve the strategy, these were implemented into the final document where appropriate to do so. Through the consultation residents confirmed they wanted to see canopy increases, increased biodiversity and genetic resilience, good risk management, and an evidenced based approach to meeting targets such as 30% canopy cover over three years.

8.2 The previous tree strategy covered the period from 2009 to 2014. It consolidated knowledge of our tree stock and measures to manage trees effectively. Climate change was a theme within the earlier strategy, but this impact has evolved in the last ten years. More urgent action is now required to mitigate the effects of global warming. To gain the most benefit, landowners in the Greater Exeter area need to work together to plan and link existing and future tree cover. The new strategy provides a framework for more collaborative measures.

8.3 The council also developed the Tree Risk strategy in 2019. This formalised the routine inspection of Council Trees using National Tree Safety Group (NTSG) guidance alongside the 2012 Quantified Tree Risk Assessment Approach (QTRA). The Risk Strategy scope was limited to managing a common sense and cost-effective tree inspection programme, and to ensuring the council took reasonable care to avoid acts or omissions which cause a reasonably foreseeable risk of injury to persons or property. The strategy does not consider wider tree management issues, such as biosecurity and disease, environmental and ecology contribution, and best practice. As a result, an overarching Strategy is required to manage Exeter's Tree and woodland estate effectively, and with regard to the growing climate emergency.

8.4 Where relevant the new strategy has taken into account Central Government's 25 Year Environment Plan, England's Tree Health Resilience Strategy, Exeter's Green Infrastructure strategy 2009, Exeter's Climate Emergency declaration 2019, and references the Exeter Tree Cover report 2023. In addition to the above documents, the strategy accords with the Forestry Commission's The UK Forestry Standard 2023.

8.5 Key themes running through the new strategy are:

- Urban Tree benefits;
- The Financial and Structural value of trees;
- Tree protection;
- Urban air quality;
- Climate change;
- Wildlife and biodiversity; and
- Effective Risk Management

8.6 It provides and outlines the importance of trees and the inherent urban tree benefits: It has long been known that trees are beneficial to urban areas and provide social, economic, and environmental benefits such as:

#### Social

- Quality of place, giving a sense of scale and softening the hard landscape.
- Improvements to mental health and wellbeing.
- Providing shade and shelter from adverse weather.
- Traffic calming, reducing the speed of traffic by having a visual impact on drivers.

#### Economic

- Trees have the potential to increase property values by up to 18%, and in streets lined with mature trees house sales complete faster.
- Trees provide timber and bio-mass, and other produce such as fruits, berries, bark and foliage.

#### Environmental

- Cleaner air through the removal of harmful gasses and particulate matter.
- Carbon sequestration through storage of carbon in the tree biomass and associated organic matter.
- Storm water attenuation through interception, ground stabilisation and infiltration.
- Moderating urban temperatures, reduced local wind speeds, and lessening the urban heat island effect.
- Noise abatement through deflection and absorption of sound.
- Trees play an important role in biodiversity, providing habitat for wildlife and improving habitat and species connectivity allowing them to move through urban environments and bringing nature into the city.

8.7 The strategy looks at operational delivery and provides a framework of best practice to protect tree stocks and provide effective risk management. It requires successional planting regimes to support age diversity of tree stocks. Already in practice this approach takes 'a right tree right place' ethos, ensuring that the location, species, existing eco system services, biodiversity, biosecurity, and procurement factors are considered as standard for planting programmes.

8.8 The strategy also looks at managing biosecurity risks. Many tree pests and diseases are imported on live plant material via the horticulture and forestry plant trades. These pests and diseases can have devastating consequences on the UK tree population, often as there will be no natural predators or controlling agents. Pest and diseases not only

have negative consequences for urban tree populations and their associated ecosystem services, but they can also have a far more serious impact on biodiversity and the wider environment.

8.9 Pest and disease outbreaks can also put the public at greater risk of harm due to increased frequency of dead and dying trees that are more likely to fail as a result. In order to combat these issues, the strategy recommends the highest biosecurity standards and the practical measures necessary to limit the risk.

8.10 It identifies the planning and development risks. With an increasing demand for housing in the city and this inevitably places more pressure on trees and the natural environment. Well established trees and hedgerows are known to add great value to new development and neighbourhoods, and it is desirable to make sure that they are retained and protected throughout the development process where possible. The strategy outlines both the councils' duties, and its recommendations, to ensuring that Exeter trees have focused consideration throughout the planning and development process.

8.11 Finally, A five-year action plan reflecting the objectives of the strategy to give a structured approach to tree management in and around the city. In conjunction with this, a longer-term ten-year plan will be developed in partnership with others to enable larger scale planting and woodland development, with an investment programme. The service is already actively working towards the goals outlined in the action plan.

## **9. How does the decision contribute to the Council's Corporate Plan?**

9.1 The Tree and Woodland Strategy supports the Corporate Plan by promoting and enhancing carbon sequestration and negating the effects of air pollution, enhancing the amenity and recreational values of urban areas, and encouraging recreational activity in woodlands.

## **10. What risks are there and how can they be reduced?**

10.1 There are no risks associated with the implementation of the strategy itself. The strategy is in place to provide risk mitigation across the councils' tree estate, and to further organisational goals in respect of climate change and ecology and biodiversity loss. However, as the council does not own the majority of the land within the city, and as pressure increases to supply a range of priorities across available land, the council's ability to meet canopy targets will be limited to its ability to influence development. This however is in part mitigated by the Environment Act 2021 requirements for developers to provide 10% biodiversity net gain on all developments in the future, onsite or offsite. Where mandatory 10% enhancements are made, this will include hedgerows and tree extensions better supporting canopy gains in the future.

## **11. Equality Act 2010 (The Act)**

11.1 Under the Act's Public Sector Equalities Duty, decision makers are required to consider the need to:

- eliminate discrimination, harassment, victimisation, and any other prohibited conduct;
- advance equality by encouraging participation, removing disadvantage, taking account of disabilities and meeting people's needs; and

- foster good relations between people by tackling prejudice and promoting understanding.

11.2 In order to comply with the general duty authorities must assess the impact on equality of decisions, policies, and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

11.3 In making decisions the authority must take into account the potential impact of that decision in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage, and civil partnership status in coming to a decision.

11.4 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the strategy recommendations are limited to the delivery of tree management and welfare across the council estate. This bears no relevance to protected characteristics and is a service based on legal duty compliance.

## **12. Carbon Footprint (Environmental) Implications:**

12.1 The implementation of the strategy will support the city in reducing carbon footprint as current tree levels enable the storage of more than 61 tonnes of carbon each year and completes the sequestration of more than 1500 tonnes of carbon per year.

12.2 The strategy recognises the need for, and identifies the routes to, increasing Exeter canopy cover with an aspirational goal of a 30% Canopy over the next 20 years. This is a 9% increase on current canopy levels and would see an increase in the levels of Carbon capture, and sequestration within the city. Alongside 10% biodiversity net gain duty, this will support a large reduction in city wide carbon levels.

## **13. Are there any other options?**

13.1 The council can continue to operate without a new Tree and Woodland management strategy, using the existing Tree Risk strategy 2019 to manage tree and woodland landscapes. Doing so would maintain a risk-based approach to tree management. It applies a simple risk assessment process to managing the condition of each individual tree but is less concerned with the city's trees as a whole. A risk-based approach does not account for risks such as disease, lack of diversity and its potential impact on species decline, nor does it support the development of the canopy cover within the city.

**Director Net Zero Exeter & City Management, David: Bartram**

Author: Cat Chambers

## **Local Government (Access to Information) Act 1972 (as amended)**

Background papers used in compiling this report:-

None

Contact for enquires:  
Democratic Services (Committees)  
Room 4.36  
01392 265275

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# Tree and Woodland Strategy 2023- 2033



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# 1.0 The Strategy

## 1.1 Introduction

The city council is one of the largest tree owners in Exeter, and the one organisation that the public see as the guardian of the city treescape, both in its role as landowner and through planning controls. As such, it is the key organisation in developing a framework to protect and sustain the city's trees.

Our trees and woodlands are vitally important in helping deliver the council's Corporate Plan and key strategic priorities of:

- Healthy and active city
- Building great neighbourhoods and communities
- Net zero carbon city

The influence of the city's trees extends beyond the city boundaries, and so trees outside its boundaries influence the city in return. To develop a meaningful long-term plan, it is essential that other major stakeholders are involved in the strategy and its delivery. It is not intended that this strategy controls tree management throughout the area of its influence but provides guidance on how the actions of various landowners can influence our landscape.

We already have more tree cover than most other cities – we now want to build on that to help ensure the future health and well-being of our communities.

## 1.2 The Reasons for a Tree and Woodland Strategy for Exeter

The previous tree strategy covered the period from 2009 to 2014, and consolidated the council's knowledge of its tree stock, and measures to manage trees effectively.

Whilst climate change was noted within the earlier strategy, the impact has evolved in the last ten years and more urgent action is required to mitigate the effects of global warming. Landowners now need to work together to optimise existing and future tree cover in the Greater Exeter area. This strategy provides a framework for collaborative measures where the strengths of various groups and organisations can be utilised for greater overall benefit.

The city council has for many years valued the trees that help frame the city, protecting them through planning controls and designating the Valley Parks. Along with other important landowners, such as the University, Forestry Commission, and Environment Agency, we must now ensure that protection is enhanced, and the opportunity to plant more trees is taken. We have good tree cover in the city, but there is scope to increase this cover both within the city and within the Greater Exeter area.

This strategy provides a framework for the delivery of a progressive arboriculture approach in line with city council corporate strategies. It reflects the concerns and interests expressed by residents, and the views and guidance arising from the arboriculture industry.

This Strategy also illustrates Exeter's current position and recommends a realistic set of proposals for the future of Exeter's Tree and woodland landscape. These recommendations are founded on public consultation feedback, and industry best practice.

## 1.3 Background

The agricultural economy that gave Exeter its prosperity in the 16<sup>th</sup> century formed the field networks that determine the rural landscape around Exeter. Hedges form the boundaries to fields, and old woodlands remain in most valleys. The Valley Parks bring many of these ancient hedgerows into the city, and the River Exe forms another green corridor reaching right into and through the heart of the city. This, combined with the higher land to the north, gives the city a pleasingly green and rural feel. A third of the land within the city boundary is woodland, green space or fields. These are also valuable habitat corridors providing wildlife refuges in an increasingly urban landscape, allowing seasonal and foraging migration, and complimenting the Exe estuary as a Special Protection Area (SPA), and internationally recognised wetland sites. Ashclyst Forest to the east, the Matford, Peamore and Haldon greenways to the south, and Stoke Woods to the north, all contribute to the overall woodland canopy of this sub-region.

Exeter was formed at what was the lowest crossing point of the River Exe. The Exe valley is relatively narrow until it reaches Exeter, at which point it opens out to a valley and flood plain almost a mile wide. Formerly, the tides reached Exeter, and the combination of tidal waters and actions of the River Exe (particularly when in spate) eroding and depositing alluvial material, helps give the Exeter area its topographical character today. The soils in Exeter range from clay to sandstone shales, with additional alluvial deposits from the Exe. The natural climax vegetation would be oak, but the soils are able to support a wide range of species. There is a great diversity of both native and exotic tree types, due in no small measure to the horticultural heritage of the city left by the nurseries of Luccombe, Pince, Veitch, and others.

Exeter is a compact city, encompassing 4774 hectares in total, with a population of 130,800 according to the 2021 Census. However, there are more than 200 hectares of council-owned public open space, including 39 ha of woodland. Together with the Valley Parks, these green spaces make up 10% of the total area of the city. The breakdown of this Public Open Space is evidenced in this Strategies companion document, The Parks and Green Spaces Strategy 2023-33.

There are over 8,000 individual trees on council land, with many thousands more in the woodlands. Other landowners, such as the University, hospital, Forestry Commission, Environment Agency and larger business premises, also actively contribute to the tree cover within the city and beyond.

Exeter is a major centre of employment with large numbers commuting daily into the city. At 1<sup>st</sup> April 2019 there were 55,800 homes in Exeter. Future growth plans require the provision of 655 homes per year. Large residential developments have and are evolving in the Greater Exeter area outside the borders of the city, and this places pressure on, and underlines the importance of, trees and woodlands and their sustainable management.

Our tree population frames our environment and has become more important in the light of development pressures, climate change, and threats from disease.

## 1.4 The scope of the strategy

The geographical scope of the strategy covers the whole city and considers the immediate hinterland and nearby woodland areas, such as Haldon and Ashclyst Forests, and reflects the predominantly rural nature of the Exe Valley.

Apart from the city council, the tree population of the city is owned by many landowners such as: the University of Exeter, Environment Agency, and Forestry Commission. Additionally, Devon Wildlife Trust manages large areas of the Valley Parks on behalf of the city council. These bodies have all been approached during the development of this strategy for opinion and information, and in order for the strategy to be successful to benefit the whole of the Greater Exeter area, all will need to be actively involved in the management of our trees.

At the time of writing, street trees remain the responsibility of Devon County Council as the highways authority for the area, but due to the importance of street trees to improve the urban landscape and enhance physical and mental well-being, this strategy seeks to ensure adequate management and protection of existing street trees, and to enhance the street tree population.

Additionally, many trees are owned by individual residential property owners. Although not aimed at individual residents, this strategy recognises the value of trees in private gardens and seeks to provide management guidance and assurance that such trees are valued and valuable to the city.

The strategy will show:

- the context in terms of legislation and policies, and how the strategy influences and determines key actions
- the higher-level values of trees and woodlands in mitigating the effects of climate change and benefitting health and well-being, and the broader ecosystem interactions
- the manner in which trees on council land are inspected, managed and maintained
- that it is essential to have a long-term, planned approach to successional and resilient tree planting; and
- that the tree cover in the city is protected through the planning process.

The strategy duration is a ten-year period from 2023 – 2033 to allow the funding and implementation of measures in a planned and effective manner. The structure of the strategy should ensure the relevance remains after this period and the strategy can be extended with only minor revisions.

## 1.5 The vision, themes, and objectives

### Vision

To protect, care for, and enhance our trees, hedges, and woodlands for the benefit of communities, wildlife, the city, and future generations.

### Key themes

The Trees and Woodlands Strategy is designed to complement and achieve the Exeter City council's Corporate Plan.

To achieve this we looked at three key areas:

- the day-to-day management of the trees and woodlands
- the interaction between trees and the communities they share; and
- long-term management of trees and woodlands in our environment.

.....and this gave rise to the following themes:

- **Trees and woodlands** – manage and maintain the city’s trees and woodlands to provide a greater resilience to climate change and future threats, and create a more diverse and sustainable urban treescape.
- **The community** – trees and woodlands that are managed for the benefit of the city’s visitors, residents and communities - for now, and generations to come.
- **Develop a resource management approach** to enable trees and woodlands to be managed and developed as a sustainable asset to support local ecosystems and habitats.

## Objectives

These themes formed the framework for the following objectives:

### **Theme trees and woodlands:**

manage and maintain the city’s trees and woodlands to give greater resilience to climate change and future threats, and create a more diverse and sustainable urban treescape.

**Objective T1:** increase the city’s canopy cover from 20% to 30% within the next 20 years.

**Objective T2:** age diversity – work towards a broader age distribution for trees and woodlands across the city.

**Objective T3:** species diversity - establish a genetically diverse tree population at both a local and city-wide scale.

**Objective T4:** species suitability - create a tree population that is well-suited to the urban environment, local site conditions, and climate variation.

**Objective T5:** tree inventory – maintain a comprehensive tree inventory to help inform of management decisions and control risk.

**Objective T6:** natural assets - gain a better understanding of the ecological structure and function of the urban forest and associated green infrastructure.

**Objective T7:** gain a better understanding of trees on privately-owned land within the city, and seek to beneficially influence management where such trees have a proportionately high influence on the locality.

**Objective T8:** develop further the 2009 Green Infrastructure Strategy to manage woodland in the Exeter hinterlands with other landowners for larger-scale benefits, such as macro-scale woodland renewal and new planting, habitat corridors, interconnecting woodlands, biomass development, and woodland management skills, such as coppicing.

### **Theme the community:**

Trees and woodlands that are managed for the benefit of the city’s communities and residents, now and for generations to come.

**Objective C1:** develop collaborative working with organisations that have an interest in the city’s trees and urban woodlands.

**Objective C2:** promote and enable community involvement and neighbourhood action to develop local ownership, interest and understanding.

**Objective C3:** actively promote appreciation and understanding of trees as a community resource, with all tree owners (residents, farmers, and businesses), to enable local initiatives to support the vitally important ecosystem that they provide.

**Objective C4:** develop regional collaboration, working in partnership with other local authorities, landowners and NGOs that have an interest in developing the urban forest and large-scale woodland regeneration.

**Objective C5:** enable cooperation, communication and enforcement to prevent damage to trees with regard to utility companies that operate within the city, and seek opportunities to plant new trees during utility upgrades.

### **Theme develop a resource management approach:**

To enable trees and woodlands to be managed and developed as a sustainable asset to support local ecosystems and habitats.

**Objective R1:** ensure the city's trees and woodlands are actively and sustainably protected, managed and developed for future generations.

**Objective R2:** assess and understand canopy cover and set goals to have a better understanding of existing canopy cover and to set an achievable canopy cover target for the future.

**Objective R3:** environmental equality – promote and ensure the benefits of the urban woodlands are available to all, particularly those in most need.

**Objective R4:** develop a woodland management plan for all of the council's woodlands throughout the city, linking with adjacent landowners to optimise value.

**Objective R5:** financial aid and grant funding – develop a funding scheme for tree and woodland establishment and management.

**Objective R6:** quality standards and resources – ensure that works are completed to the highest standard.

**Objective R7:** tree establishment, planning and implementation – investment in tree establishment using a systematic, planned and methodical approach.

**Objective R8:** site suitability – matching species to location to optimise tree cover, establishment and development to maturity.

**Objective R9:** tree protection policy, promotion and enforcement – ensure adequate measures and resources are in place for tree protection and protection enforcement.

**Objective R10:** undertake best practice management of publically-owned trees, woodlands and natural assets.

**Objective R11:** develop and maintain a proportionate, resilient and defensible system of tree risk management.

**Objective R12:** ensure a reasonable and defensible approach to tree risk management.

**Objective R13:** maximise wood and green waste utilisation, working with a range of owners, governing bodies and contractors to promote this.

## 2.0 The Tree and woodland resource

Exeter City Council actively manages over 200 hectares of publicly accessible open space, ranging from formal parks to woodlands and small communal green spaces. There is a wide and diverse collection of trees, ranging from newly planted native woodland species through to the Victorian legacy of formal parks and private gardens, and the residue of ancient oak woodlands and hedgerows that remain in the heart of the city. Together, these green spaces make up nearly 10% of the total area of the city.

Exeter City Council has a comprehensive database of its trees, woodlands, and public open spaces. The database is integrated with GIS mapping software which allows for the positions of the trees and woodlands to be accurately mapped and data easily accessed when required. The tree data can be extracted and used to provide information about the species composition, age classes, size, defects, and risk rating. In order to manage trees and woodlands effectively, this information must be kept up to date.

A 2023 assessment of the canopy cover for the city as a whole, by Treeconomics, resulted in an estimated cover of 20.2%, which is higher than the UK national average (17%) for towns and cities.

Clair Munnery of the University of Exeter has been using i-Tree software to estimate canopy cover for each of Exeter's wards. The survey found that Newtown and St Leonard's is the ward with the least amount of canopy cover at 21%, with Exwick (39.7%) and Pennsylvania (40.8%) identified as being at the higher end of the spectrum. This reflects the period of development of these wards and the housing densities in each.

### 2.1 Urban tree benefits

It has long been known that trees are beneficial to urban areas. Some of these benefits are tangible and can be quantified in numerical and monetary terms, whilst others are known but not so easily measured.

Recent scientific studies show that trees provide some of the following benefits:

#### **Social**

- Quality of place, giving a sense of scale and softening the hard landscape.
- Improvements to mental health and well-being.
- Providing shade and shelter from adverse weather.

#### **Economic**

- Trees have the potential to increase property values by up to 18%, and in streets lined with mature trees, house sales complete faster.



- Trees provide timber and bio-mass and other produce, such as fruits, berries, bark, and foliage.

## **Environment**

- Cleaner air through the removal of harmful gasses and particulate matter.
- Carbon sequestration through storage of carbon in the tree biomass and associated organic matter.
- Storm-water attenuation through interception, ground stabilisation and infiltration.
- Moderating urban temperatures, reduced local wind speeds, and lessening the urban heat island effect.
- Phytoremediation of contaminated sites, turning harmful chemicals into less harmful substances.
- Traffic-calming, reducing the speed of traffic by having a visual impact on drivers.
- Noise abatement through deflection and absorption of sound.
- Trees play an important role in biodiversity, providing habitat for wildlife and improving habitat and species connectivity allowing them to move through urban environments and bringing nature into the city.

## **2.2 The financial and structural value of trees**

In recent years there has been a great deal of research into the ecosystem services that trees provide, using systems such as i-Tree, CAVAT (Capital Asset Value for Amenity Trees) and Helliwell.

The findings of these studies provides information about individual trees and tree populations and attempts to quantify the known benefits in numerical terms. This information can then be translated into monetary values. Improved understanding of the financial value of trees helps us to see trees and woodlands as green assets rather than viewing them as an unnecessary cost burden that deplete budgets.

Monetary values provide a means of informing the decision-making process and can guide investment choices by accounting for the financial value of trees alongside the cost of establishment and ongoing maintenance.

Financial values can also be of assistance when deciding the appropriate amount of compensation that should be demanded for illegal tree removal.

Using the CAVAT valuation approach, Treeconomics assessed the value of the tree cover for the city as a whole at £1.32 billion.

## 2.3 Urban Air Quality

*The Lancet Commission on Pollution and Health* (Landrigan 2017) found that within the UK 50,000 deaths are linked with poor outdoor air quality each year.

Air pollution is currently the biggest environmental risk to health. Children, the elderly, and people with pre-existing conditions are particularly vulnerable to the effects of poor air quality.

Emissions from transportation are the most common cause of exceeding government air pollution limits in Exeter. The effects of harmful pollution are exacerbated by higher air temperatures which are likely to increase as the climate gets warmer.

Most of the time, pollution levels in Exeter are low. Exeter City Council regularly monitors its air quality and there is a downward trend in harmful pollution with a small number of areas where nitrogen dioxide is above government objectives. The council have made parts of the city air quality management areas, and are taking steps to reduce air pollution across the city. The highest pollution areas are those in the vicinity of the city's congested arterial traffic routes.

Trees are well-known for their ability to improve air quality. Therefore, as tree managers we must do what we can to ensure that this function is optimised as part of the greater plan to improve air quality at both a local and national level.

Alongside grey infrastructure, trees increase turbulence and aid dispersion of pollution. However, dense tree planting along busy roads can exacerbate the problem by trapping the pollution in and creating canyons that fumigate people in the vicinity. Therefore, careful planning is required to prevent negative effects caused by well-intentioned planting.

Trees, hedges and green walls can be used as barriers between pedestrians and vehicles to create a screen offering some protection from the source of the problem. It has been shown that good urban tree planting design can reduce air pollution, and therefore green infrastructure needs to be a consideration when designing and developing the city.

## 2.4 Climate change

Climate change is the greatest environmental challenge of the twenty-first century. Drastic action needs to be taken if the rise in global temperatures is to be kept to two degrees Celsius below pre-industrial levels; the point at which the Intergovernmental Panel on Climate Change predicts that there would be catastrophic impacts on our planet. The ability of trees to mitigate the effects of climate change are well-known, though in the greater scheme of things urban trees only play a minor role in the reduction of global carbon. Greater London's 8.4 million trees are estimated to sequester about 77,200 tonnes of carbon each year (Rogers et al. 2015). This is approximately 3% of Greater London's annual carbon emissions, or to put it another way, enough to cover its carbon emissions for about 12 days. (Tree Species Selection for Green Infrastructure: A Guide for Specifiers, 2018).

However, on a local level, the ability of trees to assist with moderating local temperature and rainfall extremes, air pollution, and UV exposure is considerable.

It is known that urban environments have their own microclimates and temperatures are greater in built-up areas due to the 'heat island effect'. This is a result of the far greater concentration of grey

infrastructure in cities. The hard landscape of mainly concrete and tarmac absorbs solar radiation more readily than the green areas that make up the majority of the surrounding countryside. This heat is then radiated out into the local environment increasing local temperatures. Adding to this, the free flow of cool air and wind is reduced by tall buildings.

Trees provide a cost-effective means of moderating local temperature extremes by offering shade, deflecting and absorbing solar radiation, and cooling the air by transpiration of water through their leaves during the summer months.

Trees are known to reduce local wind speeds. Tree canopies are permeable, which has the effect of reducing wind speed, and this can have a significant impact on the energy consumption of buildings during the colder months. In contrast, tall buildings generate turbulence and can increase wind speed.

Strategic tree planting can be used to maximise the efficiency of buildings.

## 2.5 Saving Devon's Treescapes

Due to the potential scale of tree loss, both within the Devon landscape and nationally, a number of regional projects have been established to plan and deliver mitigation measures on a large scale.

Within Devon, the Devon Ash Dieback Resilience Forum (DADRF) has been established from the Devon Tree Officers Group with a number of additional partners. The Forum has been successful in securing funding for the Saving Devon's Treescapes Project (SDT), to be led by the Devon Wildlife Trust.

The Project Steering Group represents the wider interests of DADRF and other key partners in the delivery of the project.

The SDT project will also benefit from support from an Advisory Group comprising of members of the DADRF Landscape and Ecological Resilience Group, with associated Task and Finish Groups as required.

The project aims to encourage communities to get involved in planting trees outside of woodland areas, both in the countryside and in towns and cities, in order to replace trees expected to be lost due to Ash dieback.

By engaging with local communities, schools and volunteer groups, three community nurseries and micro-nurseries will distribute free trees. Headline project proposals include:

- the establishment of at least 250,000 new trees in Devon, outside of woodland areas;
- 125 events and workshops, annual 'tree-week' festivals and 360 landowner visits will inspire community involvement and action; and
- creating or enhancing more than 150km of hedgerow.

**Action 1:** Increase tree canopy through tree planting, natural regeneration and caring for existing trees with particular focus on wards where canopy cover is identified as low.

**Action 2:** We will aim to increase our canopy cover from 24% to 30% within the next 20 years.

**Action 3:** Promote the planting of trees on private land. We will do this by sharing information about the importance of urban trees, as well as offering tree planting advice and promoting and supporting initiatives that offer free or subsidised tree planting schemes.

**Action 7:** Tree planting proposals will have to provide proof of adequate consideration for the tree's position in the landscape and the potential for any negative impacts (establishment through to maturity).

**Action 8:** The council will continue to update its tree and woodland inventory to maintain a comprehensive understanding of its tree and woodland resource.

**Action 9:** The council will Use i-Tree Eco Survey to set and maintain our understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately-owned trees across the city.

**Action 12:** We will work in collaboration with council departments and local organisations that have an interest in the city's urban forest.

**Action 13:** We will encourage community involvement and provide volunteering opportunity's allowing people to make a positive contribution to their surrounding area and help advance urban forest goals.

**Action 14:** The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.

**Action 15:** We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.

**Action 17:** We will attempt to improve access to woodlands with particular emphasis on areas where public-access opportunities have not been fully realised.

**Action 21:** We will work towards creating a tree establishment plan that is influenced by canopy cover assessment, species, and age diversity to meet canopy cover objectives.

**Action 29:** The council will aim to improve people's understanding of the importance of urban trees through a range of information channels,

## **3.0 Wildlife and biodiversity and biosecurity**

### **3.1 Wildlife and biodiversity**

Exeter City Council's green spaces, including hedgerows, riparian corridors, and woodlands provide habitat for wildlife and provide spaces where people can enjoy informal active recreation throughout the city. In general, the more biodiverse an area is – the greater the

range of species and landscape types – the better for sustaining and evolving the more complex food chains and habitats.

### 3.2 Exeter's habitats

The Valley Parks and Nature Reserves in the city provide an important refuge for wildlife and offer places where people can learn about, enjoy, and interact with nature. These include Riverside, Ludwell Valley, Mincinglake, Alphington, and Whitstone Valley Parks, and Local Nature Reserves at Belvidere Meadows in Duryard and St James', and Barley Valley Local Nature Reserve in Exwick. RSPB nature reserves are located at Countess Wear, Topsham and Exwick in the wetland areas that are associated with the River Exe.

The lower reaches of the Exe, with its foreshore and low-lying land, is internationally recognised for its importance for wintering wildfowl and waders. There are also many rare species of plants, and the sandbanks and mudflats support communities of invertebrates that are of national significance. The site contains key features of geological interest and has been the subject of considerable scientific research. Due to this, Natural England have designated it as Site of Special Scientific Interest (SSSI).

Stoke Woods (Forestry Commission) is situated to the north of the city and has been designated as a SSSI, in part because of its geological and ecological interest. It still retains a small area of ancient semi-natural woodland a significant heritage feature for Exeter, as well as presenting a rich diversity of habitat for species partly or wholly reliant on its continued existence.

### 3.3 Tree based habitats

Exeter's green infrastructure makes an important contribution to these diverse and valuable ecosystems, providing a green link between different sites and habitats, allowing species to migrate through the city.

Trees and woodlands provide valuable habitats for a great variety of plants, lichens, fungi, mosses, mammals, birds, and insects (Hart, 1998). Woodlands are essential to a broad range of species. Native broadleaved woodland is particularly notable for their value to wildlife and biodiversity, supporting important and sometimes rare flora and fauna.

Veteran trees, as well as deadwood habitat, provide specialist niches for wildlife, including many fungi, lichens, and invertebrates. As such, both are highly valued and efforts must be made to retain and enhance trees with such characteristics. Deadwood in its various forms, whether it be standing dead trees, deadwood within live canopies or fallen and heaped deadwood on the ground, are all part of the lifecycle of a tree. Trees with cavities, cracks and fissures also offer valuable habitat for various woodland species including birds and bats. It should be remembered however that urban trees are quite often not in their natural setting and a balance must be struck between ensuring the safety of those who can be affected and the need for wildlife habitat. Efforts must be made to retain deadwood and trees with desirable characteristics where they do not pose a significant threat to public safety.

There is a risk that tree works can disrupt various species, particularly when they are vulnerable to disturbance, such as the disruption of birds, dormice and bats during breeding, nesting, roosting, and hibernating. Compliance with the 1981 Wildlife and Countryside Act and subsequent regulations requires appropriate checks and controls to be in place to ensure species protection.

Silviculture and urban tree management can have a positive impact on flora and fauna by improving species and age diversity, creating differing habitats that are often an integral part of habitat management and species conservation. For example, the process of coppicing in woodland makes conditions much more conducive for particular species of ground flora by improving light penetration to the woodland floor.

Wildlife habitats benefit enormously from well-informed tree and woodland management, conservation, and habitat improvement. Urban wildlife habitats can be fragmented and cut off from surrounding green infrastructure. There needs to be a concerted effort to improve wildlife corridors and habitat connectivity by bridging gaps in tree groups, woodlands, and hedgerows where it is possible to do so.

The council will comply with all appropriate legislation and will seek specialist advice when it is considered necessary and appropriate to do so.

Exeter City Council works closely with other organisations in the city, such as Devon Wildlife Trust, The Forestry Commission, RSPB, Natural England, and the Environment Agency, to ensure that our tree and woodland management supports and complements habitats and wildlife.

### 3.4 Biosecurity - the current situation

The *Application of Biosecurity in Arboriculture: Guidance Notes*, (Arboricultural Association 2018) stated that there has been more than a 600% increase in new pests and diseases arriving into the UK compared with the previous 20 years. This statistic is very concerning, and the rise has been largely attributed to increased global trade and climate change.

Many tree pests and diseases are imported on live plant material via the horticulture and forestry plant trades. These pests and diseases can have devastating consequences on the UK tree population, often as there will be no natural predators or controlling agents. Once established, control measures are extremely difficult and expensive to implement. Preventative measures to reduce the risk of further introduction and spread of harmful organisms is a more practical option.

Pest and diseases not only have negative consequences for urban tree populations and their associated ecosystems, but they can also have a far more serious impact on biodiversity and the wider environment.

The economic effects of dealing with the impacts of these harmful agents can be massive, for example it was recently estimated that ash dieback will cost the UK economy in the region of 15 billion pounds. The effects of further pest and disease outbreaks will no doubt put more pressure on the natural environment and the tree management resources.

Pest and disease outbreaks can put the public at greater risk of harm due to increased frequency of dead and dying trees that are more likely to fail as a result. In addition, there are direct health threats from harmful pests such as the Oak Processionary Moth (OPM) which has now reached the UK and is becoming established in London's tree population, despite efforts to contain and eradicate it. The OPM caterpillars produce hairs that commonly cause an allergic reaction leading to skin rash, conjunctivitis and respiratory problems further threatening human health.

Exotic pests and diseases present in the UK include Acute Oak Decline, Elm Zig-Zag Sawfly, Sweet Chestnut Blight, Red Band Needle Blight, Larch Tree Disease, and Shoot Blight of Cedar to name a few.

Pests and diseases established in Europe include Emerald Ash Borer, Plane Wilt, Oak Wilt, Pine Processionary Moth, and Phoney Disease of Peach. All of which have the potential to have devastating consequences for our tree population should they migrate.

It is important to keep in mind that indigenous populations of insects, bacteria, moulds, and fungi are part of the natural ecosystems, and their presence should not necessarily cause alarm. They usually play an essential role in the natural environment and the balanced cycle of decay and degradation in our trees and woodlands. Trees often live with insect infestations and wood degrading fungi for many years, and their presence does not automatically mean that a tree is in poor condition, or that action needs to be taken.

### 3.5 Biosecurity - what we are doing about it.

Because arboriculturists regularly encountered infected plant material, shred and transport branches and move from site to site, there is the risk that they may unintentionally facilitate the spread of harmful organisms. Therefore, measures and actions must be taken to reduce the chances of inadvertently spreading unwanted pests or pathogens throughout the city and the wider area.

In order to combat these issues the council follows the highest biosecurity standards and there are practical measures that can be taken to limit the risk. The council will take the following actions:

**Action 1:** Follow the latest government legislation and advice and comply with movement restrictions and Plant Health Notices where they apply.

**Action 2:** Retain on site infested / infected logs, where it is safe and practical to do so. Where logs cannot remain on site, it may be necessary to strip the bark or remove the logs and burn them at a nearby burn site.

**Action 3:** Retain on site infected / infested woodchip and other plant material where it is practical to do so. Where this is not possible or desirable to leave the arising's on site they will be taken to a nearby licenced green waste handling facility where they can be pasteurised or sterilised as necessary.

**Action 4:** Contaminated material will not be used as mulch or substrate.

**Action 5:** Anyone visiting an infected site should thoroughly clean footwear, equipment, and vehicles before leaving the infected area.

**Action 6:** New trees will be procured from trusted nurseries that adhere to the highest biosecurity practices (quarantine and isolation) and have a plant passport or phytosanitary certificate as required.

**Action 7:** Imported plants will be inspected before being planted.

**Action 8:** The latest biosecurity information will be distributed to staff, contractors, and members of the public to raise awareness, and assist with the early identification and eradication or control of harmful organisms.

**Action 9:** Report new pest and disease finding to the Forestry Research via the Tree Alert portal to ensure that they are made aware of the new outbreaks and distribution of tree threats.

**Action 10:** Phased tree planting and removal to ensure that there is good representation of all age classes at both a local and city level.

**Action 11:** Undertake tree planting and removal with a focus on creating a diverse mixture of species and genotypes.

**Action 12:** Source and select trees for planting that are well-suited to the local site conditions, alongside the phased removal of trees that are not suitable or have become problematic as a result.

**Action 13:** We will seek advice from, and work in collaboration with, local ecologists and nature conservancy charities such as Devon Wildlife Trust in order to gain a better understanding of the council's green infrastructure, and the special management that is required in order to protect and enhance the wildlife that they support.

**Action 14:** We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.

**Action 15:** The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.

**Action 16:** We will manage ECC's trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.

**Action 17:** We will improve the ecological value of our woodlands by developing a woodland management plan that is focused on sustainability and ecological integrity whilst facilitating appropriate public access.



**Action 18:** All planting stock must be procured from trusted nurseries that adhere to the highest biosecurity practices (quarantine and isolation) and have a plant passport or phytosanitary certificate as required.

**Action 19:** Staff, partner organisations and contractors will be expected to follow the highest biosecurity practices and stay up to date with the latest government advice and recommendations.

## 4.0 Tree establishment

### 4.1 Increasing canopy cover

Over the past 10 years the city council has planted in excess of 10,000 trees at various sites in the city. The city council recognises the importance of successional tree planting and aims to increase the city's canopy cover from its current level of 24.5% to 30% within the next 20 years. As the city council owns 18% of the total city area, with the remaining 82% in private ownership it is clear that in order to achieve the 30% canopy cover target there is need for collaboration with other landowners and organisations that have an interest in urban woodlands.

It is essential that replacement planting by as many landowners as possible is to an overall strategic aim to ensure that canopy cover, species and age diversity are not only sustained but also increased. Whilst native species clearly have advantages in providing habitats that match local biospheres, exotic species have beneficial attributes as well. Thus a balanced approach to species mix, and a focus on increasing canopy cover in areas where it is at its lowest will help towards reducing environmental inequality.

Many of the city's parks and open spaces already have good levels of canopy cover and care needs to be taken to avoid creating overstocked tree groups that are more predisposed to poor tree health and in some cases wind-throw. Management should encourage sufficient space for, and healthy growth of, individual specimens to reach their full potential.

It is not always possible or in the best interest of anyone to replace trees in the same location. Quite often trees have been planted without consideration for their future growth or have succumbed to soil-borne disease. Existing guides assist in choosing and planting trees (Defra, 2018. *Urban Tree Manual-v15*), and local tree planting plans will provide a framework that clearly states the reasons for the preferred species range, and allow community groups and landowners to use these as a basis for securing funding from a range of sources as part of a sustainable and long-term aim. To provide a more comprehensive overview of the extent of tree cover, and help to develop silvicultural management within Exeter, the city council's tree team will continue to map and identify sites that meet the criteria for sustainable tree growth, as well as seeking financial aid from sources such as grant funding and donations from local businesses and members of the public.

## 4.2 Successional planting

Tree planting is an important part of silvicultural management, and successional planting is an essential tool to develop canopy cover and manage tree species biodiversity. Carrying out tree planting on a planned and regular basis helps to create a varied and diverse age structure. This means that as older trees are lost they are replaced by already established successors, as occurs naturally in woodlands and forests. A diversity of age ranges also contributes to increased biodiversity with trees providing differing habitats, food sources and ecological niches at the different stages of their life cycle.

## 4.3 The Right Tree for the Right Place

The principles in DEFRA's *Urban Tree Manual V15* will be used to assist in selecting the "right tree for right place". The following factors will be considered:

1. **Location:** choosing the site, aspect, and an assessment of constraints.
2. **Tree selection:** ensuring appropriate species for the long term.
3. **Ecosystem services:** the broader benefits trees bring to the area.
4. **Biodiversity:** tree selection to enhance and support biodiversity.
5. **Procurement:** procurement policies and standards, including preferred provenance.
6. **Planting and establishment:** ground preparation, tree handling processes, adequate investment in after care, including, mulching, weeding, watering, and formative pruning.
7. **Pests and diseases:** identification of threats, management solutions.

## 4.4 The need for a planned and structured approach

One of the biggest challenges for tree planting and woodland creation in the urban environment is finding suitable land and positions to plant trees. There are often competing needs for greenspace as well as many above and below ground constraints. To overcome these challenges an ad-hoc approach to planting must be avoided, and instead opt for tree establishment that is planned as part of a larger strategic tree plan, with long-term consideration for the competing uses of green space and the sustainability of the urban forest as a whole.

Well thought out planting schemes should aim to achieve the greatest benefits and long-term sustainability whilst having consideration for people and property that could be adversely affected. This approach is expected to optimise the ecosystem services whilst reducing the level of tree-related complaints, and the requirement and costs of remedial works.

## 4.5 Procurement of healthy planting stock

The UK's trees and forests are coming under increasing threat due to climate change and the rising level of pests and diseases entering the UK due to globalisation and a warming climate. One of the ways of reducing risk is by procuring planting stock from local nurseries that follow the highest biosecurity standards to help prevent the spread of indigenous and exotic plant pests and pathogens.

## 4.6 Species selection

Selecting trees that are well-suited to the planting site will go some way to ensuring successful establishment, also resulting in a less susceptible and more resilient tree stock overall. It is now generally understood that species and genetic diversity is key to ensuring that the treescape is more resilient to biotic and abiotic threats. To help avoid monocultures, a useful guide is the '10, 20, 30 Rule'. This states that for any given tree population there should be no more than 10% of a particular species, 20% of a particular genus and 30% of a particular family.

Encouraging natural regeneration, where appropriate, is also an effective way of increasing genetic diversity that is adapted to local and changing conditions, and thus building more resilience.

Native broadleaved woodlands support a broad spectrum of indigenous flora and fauna and are of great ecological and historical importance. Often these qualify for a biodiversity action plan, especially if of ancient origin. Woodland planting will generally consist of native species which will be chosen according to the local National Vegetation Classification type, with the use of tools such as the Forestry Commissions Ecological Site Classification in order to make sure that the most appropriate species are selected, and that they are in keeping and with the existing or adjacent woodland ecosystem.

Exotic trees and cultivars however do have their place in the city and Exeter has a long history of breeding, importing, and planting ornamental and exotic trees. Urban environments often consist of engineered landscapes for which many of our native tree species are not well suited and it is often necessary to plant other species. Having the ability to use a variety of native and introduced trees allows more choice and a better ability to match the tree species with the prevailing site conditions, leading to better long term results. An example is the urban heat sink caused by buildings and roads absorbing then releasing heat, and an exotic tree from a latitude closer to the equator with xerophytic characteristics may thrive. Ornamental trees are also desirable for their ability to add variation and interest to many of Exeter's parks and open spaces, and private gardens, whilst contributing to the greater diversity and resilience of the tree stock.

In order to achieve best planting practice tree planting, specifications will be made in accordance with *British Standard Trees: from nursery to independence in the landscape - Recommendations BS8545: 2014*

## **What are we going to do about this?**

**Action 1:** Increase tree canopy through tree planting, natural regeneration and caring for existing trees with particular focus on wards where canopy cover is identified as low.

**Action 2:** We will aim to increase our canopy cover from 24% to 30% within the next 20 years.

**Action 3:** Promote the planting of trees on private land. We will do this by sharing information about the importance of urban trees as well as offering tree planting advice and promoting and supporting initiatives that offer free or subsidised tree planting schemes.

**Action 4:** Phased tree planting and removal to ensure that there is good representation of all age classes at both a local and city level.

**Action 5:** Undertake tree planting and removal with a focus on creating a diverse mixture of species and genotypes.

**Action 6:** Source and select trees for planting that are well suited to the local site conditions, alongside the phased removal of trees that are not suitable or have become problematic as a result.

**Action 7:** Tree planting proposals will have to provide proof of adequate consideration for the tree's position in the landscape and the potential for any negative impacts. (Establishment through to maturity).

**Action 13:** We will encourage community involvement and provide volunteering opportunity's allowing people to make a positive contribution to their surrounding area and help advance urban forest goals.

**Action 15:** We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.

**Action 18:** The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.

**Action 19:** The council will seek to take advantage of any available financial aid and grants for tree and woodland establishment and management.

**Action 21:** We will work towards creating a tree establishment plan that is influenced by canopy cover assessment, species and age diversity in order to meet canopy cover objectives.

**Action 31:** All planting stock must be procured from trusted nurseries that adhere to the highest biosecurity practices (quarantine and isolation) and have a plant passport or phytosanitary certificate as required.

**Action 32:** Staff, partner organisations and contractors will be expected to follow the highest biosecurity practices and stay up to date with the latest government advice and recommendations.

## 5.0 Planning and development

### 5.1 Trees in relation to development

There is an increasing demand for housing in the city and this inevitably places more pressure on trees and the natural environment. Exeter City Council aims to ensure that housing growth is balanced and sustainable and is achieved without the loss of the city's character and biodiversity.

Well-established trees are known to add great value to new development and it is desirable to make sure that they are retained and protected throughout the development process.

Trees are particularly vulnerable to irreparable damage during the construction phase, through direct damage caused by factors such as root severance, mechanical damage to stems and branches and or indirect damage through root zone soil compaction and contamination.

The Town and Country Planning Act 1990 (section 197) puts a specific duty on local authorities to ensure, whenever it is appropriate that, in granting planning permission for any development, adequate provision is made by the imposition of conditions for the preservation or planting of trees.

This means that the impact on existing trees and the requirement for the planting of new trees is considered as part of any new development. Trees that could be impacted by a new development will be assessed and evaluated by an arboriculturists with reference to British Standard BS5837: *Trees in relation to design, demolition and construction – recommendation* as part of an informed decision-making process.

Where tree officers think that it is necessary to amend a development proposal they can communicate this to the applicant. Once the final application has been received and assessed it can be considered for approval taking into account the local development plan, planning policy and other material considerations. Permission can be granted with several conditions which can include the retention and protection of particular trees or the provision of new planting on site or on public land elsewhere. This does not however allow the council to make unrealistic demands on the developer, and applicants can appeal refused planning permission or conditions through the Planning Inspectorate.

The government has published a mandate within 'A Green Future: Our 25 Year Plan to Improve the Environment' Defra, 2018, to ensure that there is a *'biodiversity net gain'* meaning the *delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity. Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they*

*were pre-development. They must assess the type of habitat and its condition before submitting plans, and then demonstrate how they are improving biodiversity – such as through the creation of green corridors, planting more trees, or forming local nature spaces. Green improvements on site would be encouraged, but in the rare circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere (Defra, 2019).*

Exeter City Council will work with developers and other stakeholders to ensure that the guidance within 'A Green Future: Our 25 Year Plan to Improve the Environment' is followed to achieve a 'net environmental gain' in relation to development, to deliver environmental improvements.

## 5.2 Development on council land

There are occasions when it is considered desirable to develop council owned land. In order to protect trees on or near to these proposed developments the council will adhere to best practice. The current British Standard BS5837: *Trees in relation to design, demolition and construction – recommendation* provides clear guidance on the steps that should be followed to protect and manage the existing trees throughout the development process. An appropriately qualified arborist will be consulted throughout the course of the development.

## 5.3 Tree Preservation Orders

Tree Preservation Orders (TPOs) are administered by the council's Planning Department, as is standard practice with most local authorities. TPOs are designed to protect trees that provide significant amenity to the area. A TPO can be applied to any species of tree but the protection does not include hedges, bushes or shrubs. TPOs can apply to individual trees (including saplings), groups of trees and woodlands. No tree species is automatically protected.

There will be a presumption against the cutting down or pruning of a protected tree, unless there are compelling grounds to do so, for example, the tree has become unstable. Where permission is granted the council may impose conditions requiring that a replacement tree is planted.

A TPO makes it a criminal offence to cut down, top, lop, uproot, wilfully damage or destroy a tree that is protected by that order, or cause or permit such actions, without the authority's permission. Anyone found guilty of such an offence is liable to prosecution, and an unlimited fine can be imposed for destroying or removing a protected tree without consent from the council.

The council rarely places TPOs on its own land, as this would be an unnecessary administrative burden, and the council as a body is expected to be a responsible tree manager. There are however, exceptional circumstance where there is a threat from a third party and a TPO will be applied to a council tree.

## 5.4 Conservation Areas

Exeter has 20 Conservation Areas, which are administered by the council's Planning Department.

Conservation areas are areas of special architectural and historic interest, the character or appearance of which it is desirable to preserve and enhance (Mynors, 2011).

Under the Town and Country Planning Act 1990 the council has a duty to publicise planning applications in conservation areas and have regard to the character and appearance of the area in carrying out its planning functions. Trees are recognised as an element in the character of a conservation area and as such there are rules that apply before works can be undertaken to trees in one of these areas.

Proposed tree works in a conservation area require that the council is given six weeks prior written notice detailing the proposed works. This gives the council the opportunity to place a TPO on a tree should it be deemed necessary.

## 5.5 Hedgerow regulations

The Hedgerow Regulations 1997 offer legal protection to hedges that are considered to be of importance. Anyone proposing to remove a hedgerow or part of the hedgerow which is covered by the regulations must notify the council of their intention to do so by submitting a Hedgerow Removal Notice.

A hedgerow is defined as having a continuous length of or exceeding 20 metres, or if it has a continuous length of less than 20 metres and at each end meets another hedgerow. Any gap resulting from a breach of the hedgerow regulations and any gap of 20m or less will be treated as part of the hedgerow (Maclean, 2017).

## 5.6 High Hedges

Under the Anti-social Behaviour Act 2003 the council has powers to intervene and act as an impartial adjudicator if there is a neighbourly dispute regarding an evergreen or semi evergreen hedge that is over 2m in height and all other means to resolve the issue have been exhausted. Further information can be found on the council's website.

### **What are we going to do about this?**

**Action 1:** We will engage with utility companies to ensure that their operations do not have a negative impact on council trees. The council will provide channels for residents and communities to report damage or trees at risk from damage by others.

**Action 2:** There will be a presumption against the cutting down or pruning of a protected tree. Where permission is granted the council will seek impose conditions requiring that a replacement trees is planted

**Action 3:** The council will seek to prosecute anyone who illegally damages or destroys public trees.

**Action 4:** Trees that could be impacted by a new development will be assessed and evaluated by an arboriculture's with reference to British Standard BS5837: Trees in relation to design, demolition and construction – recommendation as part of an informed decision making process.

## **6.0 Tree management on council land**

The city council is responsible for a considerable proportion of the city's trees, and there is a range of management measures in place to ensure trees are managed safely, but with the minimum of intervention.

### **6.1 Tree risk management**

To ensure that the council fulfils its duty of care we have adopted a Tree Risk Strategy that ensures that the council has a reasonable and defensible approach to tree risk management. The Tree Risk Strategy has been developed using a recognised standard methodology (Quantified Tree Risk Assessment) and follows the latest industry guidance and best practices.

### **6.2 Tree surveys**

The city council operates a relational database linked to a Geographical Information System (GIS) to provide spatial mapping. Trees are either recorded individually, as part of a group, or as a woodland, depending most often on factors such as the tree's surroundings (targets) and the estimated level of risk (probability of failure and size of part).

### **6.3 Tree inspections**

All council-owned trees are subject to periodic inspection, and these are carried out by appropriately qualified personnel. As part of our risk-based approach, inspections are prioritised according to location. This means that we would generally inspect trees in busy areas such as the city centre more frequently than those in lower use areas such as a woodland.

Systematic tree inspections ensure that where trees are in decline or have become hazardous due to structural defects, disease or decay, they are identified and appropriate works are prescribed accordingly. It also allows an overview of the tree stock to plan management and planting needs on an appropriate scale, such as when outbreaks of pests or diseases occur.



## 6.4 Pro-active tree maintenance

As part of a proactive approach to tree management a “Ward Work” programme ensures each of Exeter’s 13 Wards are visited at least once every five years. Ward work includes the following operations:

- Crown lifting to achieve statutory clearances over footpaths, cycle ways and highways.
- Removal of hazardous deadwood and hung-up limbs.
- The removal of basal suckers and epicormic growths.
- The severing of ivy to facilitate future tree inspections.
- The clearing of branches away from buildings (2 metres where possible).
- Pruning to clear infrastructure such as signs, lamp posts, and walls.
- Felling of small dead trees where they present a significant threat.
- Formative pruning and maintenance of young trees (mulching, stake removal, etc.).

Ward work does not include the removal of branches that overhang private properties. Some tree works may also be delayed due to factors such as the presence of nesting birds, the requirement for traffic management and specialist equipment hire.

## 6.5 General tree works

Alongside the ward work, the cyclical tree inspections programme and enquiries from members of the public lead to further works. Tree works are generally prioritised according to the assessed level of risk as part of ECC’s risk-based approach to tree management.

Trees in urban areas are often the cause of complaint particularly when they are in close proximity to properties and areas of high occupancy.

Problems can often be alleviated through good arboricultural management, however there are situations where poor past management and species selection mean that the arboricultural options are limited and it is not always possible to reach a solution that meets everyone’s needs. The council will do what is in the interest of the wider population and cannot always meet the desires of individuals.

Many tree species have great longevity and there is a tendency for people to think that they have an infinite lifespan. Although trees are generally longer lived than humans they, like all living things, will eventually fail. This is something that can lead to outcry from the public when pre-emptive action is required to manage the

decline of trees in the interest of public safety. Keeping in mind both the value of trees and the fact that they can fail and cause harm, there must be a balanced approach to tree management that takes into account the known value of trees whilst ensuring that there is not an unacceptable risk to the public.

All tree works will be carried out in accordance with the current British Standard (BS3998) or equivalent.

## 6.6 Enquiries

The council receives a high volume of tree-related enquiries. In an attempt to improve efficiency in this area the web-based reporting system has been streamlined to allow for easy reporting of tree-related complaints and hazards. People also have the opportunity to report issues via telephone, email, and post. In addition to this there is a list of “Frequently Asked Questions” (FAQ) on the website providing information about some of the more common causes of complaint and related policies. Although it is intended to respond to all enquiries within 14 days of receiving the initial report of the problem, at busy times of the year response time for non-urgent enquiries may be longer.

## 6.7 Requests for tree work

Under normal circumstances the council will only carry out works to trees for the following reasons:

- The tree is structurally compromised and poses a significant threat to the public, in line with the Tree Risk Management Strategy.
- Tree branches are low over footways, cycle paths, and roads, or obstructing signage, lights or site lines.
- The trees branches are close or touching buildings or other infrastructure.
- There is a proven case of tree related subsidence.
- The control of pests and diseases.
- For tree and woodland improvement / management.

## 6.8 Tree removal

Trees may need to be removed for a number of reasons, for example:

- The tree is hazardous and poses a significant threat to people and or property.
- The tree is self-set or inappropriately planted, and where its unsuitability for the location outweighs any environmental benefits.

- To abate a nuisance that could lead to litigation.
- The tree is found to be causing damage through subsidence.
- To make way for approved development or engineering works.
- Thinning works to improve the quality of the retained trees.
- Woodland management works, for example in accordance with the UK Forestry Standard.

## 6.9 Nuisance issues

Trees are often the cause of complaint. Commonly these nuisances are caused by seasonal events such as leaf fall in the autumn or shade caused by trees throughout the growing season. These problems are usually an inconvenience rather than a reasonable justification for heavy pruning or tree removal.

The council will not normally undertake tree pruning or removal for the following complaints:

- Overhanging branches.
- Leaves and fruit falling onto private property.
- Honeydew and sap.
- Nesting and roosting birds.
- Excessive tree height.
- Swaying trees and branches.
- Unproven claims of root damage, perceived or otherwise.
- Issues with shade and shadows.
- Phone line, power line and signal disruption.
- Trees blocking views.
- Pollen allergies.

All nuisance-related enquiries will be considered on a case-by-case basis, and the complainant will be informed about the outcome of the assessment.

## 6.10 Tree work standards

The majority of the tree works are carried out by the council's appointed contractors and will be carried out to the highest standard. It is a contractual requirement that the contractors are and remain approved by the Arboricultural Association.

All works are expected to be completed in accordance with the current industry best practice, such as British Standards 3998:2010 *Tree Work – Recommendations*. Other industry standards and guidelines are to be followed for operations that are not covered in BS3998 for tasks such as tree planting.

To ensure that the expected quality of work is delivered the council's tree team randomly audits approximately 10% of the completed jobs. If the standard is not met the contractors will be asked to return to site and make good before payment is made.

## 6.11 Veteran and ancient trees

A desktop study of the Woodland Trusts, Ancient Tree Inventory shows that there are approximately 26 veteran trees, 20 'notable' trees and three ancient trees recorded on Exeter's public open space (March 2019).

Exeter's ancient and veteran trees provide an important link to Exeter's rich and varied past and as such are of great historical importance. Veteran trees are known for the supporting a broad diversity of species and have special importance culturally, ecologically, biologically, and aesthetically.

Specialist management is required to sustain these trees so that they continue to exist for as long as possible. The city council's veteran tree management accords with Natural England's "*Veteran Trees Guide to Good Management Guidance*".

## 6.12 Tree management on ECC housing land

Exeter City Council owns and manages over 400 properties providing rented accommodation throughout the city. The property type varies from blocks of flats and sheltered housing to individual dwellings. The properties often have private gardens or are surrounded by communal gardens and green spaces. The management of the trees on these sites is within the remit of Exeter City Council's Tree Management programme.

There are currently over 1000 trees associated with city council housing land. The trees provide multiple benefits and play an important role in enhancing and softening the built environment, making them more enjoyable places to live. Trees on housing land contribute to the wider treescape and form an important part of the green infrastructure, providing connectivity and a green link to the surrounding areas.

The housing tree stock is diverse with a mixture of native and introduced trees of varying species and age ranges, from newly planted young trees through to mature and veteran age classes.

The trees found in communal areas have usually been planted in a planned manner, with less formal ad hoc planting often occurring in tenanted gardens. There is generally relatively few mature trees that predate the houses and have managed to survive despite the surrounding land being developed.

Due to the transient nature of tenancies, there is a legacy of little consideration for the long-term growth and sustainability of trees within gardens. Self-set trees are also commonplace and frequently occupy neglected gardens, and some of the more inaccessible communal areas. The effects of self-set trees and the ad hoc approach to planting is that many trees exist in locations where they are not suitable or desirable. In some cases this can be tolerated whilst in others there is a real impact on the reasonable enjoyment of the property. In contrast, there other areas that are completely devoid of trees and have become characterless and bleak as a result.

The council aims to address this by phased removal and pruning of trees that have become problematic or hazardous, in conjunction with a programme of tree planting to ensure that canopy cover is sustainable, and increased in areas where it is currently poor.

### 6.13 Vandalism and damage to council trees

As with other urban areas Exeter's tree are subject to varying levels of vandalism. Sometimes this vandalism is caused by deliberate action whilst on other occasions it can occur through simple ignorance and trees can become accidentally damaged through lack of care. Vandalism sometimes occurs randomly whilst on other occasions there are patterns with incidences occurring in particular areas usually alongside other antisocial behaviour.

More obvious forms of vandalism include topping, hacking, and ring barking of trees usually because of a perceived nuisance. Newly planted trees are particularly vulnerable to vandalism because they are easily snapped and broken. This is a source of great frustration for both the council and the local community who are all too aware of the difficulties and costs incurred in planting and establishing replacements.

Other forms of vandalism occur through the actions of others undertaking works in the public realm. The most common examples include the severing of roots for the installation of utility's and infrastructure, compaction of root areas with materials and or machinery. Urban trees are often severely affected by soil compaction. Most contractors undertaking this work for utilities have policies clearly stating that trees within the work zone must be protected, but often this is not correctly managed and irreversible damage is done. Even if the tree is not killed immediately, and the long-term impact on the trees stability and physiological condition are not immediately obvious, relatively "minor" failures

such as damage to the bark, or ground contamination by diesel, cement or road salt will have a detrimental and often fatal effect.

In an attempt to mitigate the effects of vandalism to newly planted trees the council will use larger planting stock which is less vulnerable to vandalism, particularly with regards to the snapping of stems and branches. The use of tree guards will also be considered where they are cost effective and can significantly reduce the risk. The downside to these measures is that they are often expensive and as such they will be limited to circumstances where they are the only means of successful tree establishment.

Attempts to educate people about the great importance of urban trees through the creation of tree trails and volunteering opportunities for schools is hoped to go some way to changing attitudes and reducing levels of vandalism as a result.

## 6.14 Tree-related damage claims

Trees are living organisms and despite a dynamic management system being in place accidents and damage can occur. Trees are managed to minimise the risk of accidental damage or injury from fallen limbs or failure of the whole tree, maintain reasonable and adequate clearance from properties and structures, and structural damage. The city council will assess any insurance-related matters with the support of the tree team. The city council will not pay any unsubstantiated claims, and will only pay claims where liability is proven, and foreseeable harm or damage has occurred. The onus is on the claimant to provide evidence to support a claim.

### **What are we going to do about this?**

**Action 1:** The council will continue to update its tree and woodland inventory in order to maintain a comprehensive understanding of its tree and woodland resource.

**Action 2:** We will risk assess trees using a recognised methodology (QTRA), set appropriate re-inspection intervals and keep records on the council's tree database (Confirm) in accordance with the council's Tree Risk Management Strategy.

**Action 3:** We will seek advice from, and work in collaboration with, local ecologists and nature conservancy charities such as Devon Wildlife Trust in order to gain a better understanding of the council's green infrastructure, and the special management that is required in order to protect and enhance the wildlife that they support.

**Action 4:** We will encourage community involvement and provide volunteering opportunity's allowing people to make a positive contribution to their surrounding area and help advance urban forest goals.

**Action 5:** The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.

**Action 6:** We will engage with utility companies to ensure that their operations do not have a negative impact on council trees. The council will provide channels for residents and communities to report damage or trees at risk from damage by others.

**Action 7:** The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.

**Action 8:** We will manage ECC's trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.

**Action 9:** The council will seek to prosecute anyone who illegally damages or destroys public trees.

**Action 10:** The council will manage its trees in accordance with industry standards and best practice to ensure that council trees are in good physiological and structural condition in order to promote longevity and maximise ecosystem services.

**Action 11:** The council will manage tree risk in accordance with its Tree Risk Management Strategy following the latest industry guidance (NTSG) and using a well-recognised and accepted risk assessment methodology.

**Action 12:** The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.

## 7.0 Delivery of the Tree and Woodland Strategy

### 7.1 Action Plans

A five-year action plan will be developed reflecting the objectives of this strategy to provide a structured and funded approach to tree management in and around the city.

In conjunction with this a longer-term ten-year plan will be developed in partnership with others to enable larger scale planting and woodland development, with an investment programme.

## 7.2 Strategy monitoring and review

This strategy, and the action plans, will be reviewed and updated annually to ensure that it remains relevant to the city, and is compliant with current legislation, guidance and industry best practice.

## 7.3 Investment plan

A short and medium-term investment plan is required to provide a planned approach to delivering the Tree and Woodland Strategy. Long-term planning is particularly essential due to the long timescales for trees to establish, whilst allowing the flexibility to react to short term but significant risks such as infections and storm damage.

### Revenue expenditure:

#### Inspection regime

The inspection regime has been developed over the last 10 years to the point where the frequency and style of inspection provides adequate and proportionate risk management data, with records digitally updated in real time. The volume and costs of works will vary according to a wide range of influences, and works are prioritised primarily in relation to risk. The current inspections and works budget is appropriate with an allowance for contract upgrade, and assuming no significant impact from legislative, work practice or waste disposal changes.

#### Woodland management

Old and new woodlands need management, though this can be on a long-term rolling programme. It is assessed on individual locations rather than a fixed maintenance structure. However the budget restraints since 2010 have resulted in a number of woodlands missing restorative felling, or formative thinning, resulting in poor and weak specimens subject to windthrow.

There is insufficient funding within the Revenue budget to manage woodland management effectively. Whilst existing woodlands are not being adequately managed, the capacity to promote more sustainable community woodland schemes is jeopardised. A capital –funded Woodland management scheme would enable existing woodlands to be brought into line, primarily by utilising a mix of volunteer and contractor resources, and aligned with community woodland planting schemes.

#### Problematic trees

Some of the council's tree stock is simply not suitable for its position and may be causing significant damage to property and infrastructure as a result. There are also trees that pose an unacceptable risk due to the presence of structural defects. Defects which may be inherent to a particular species or cultivar, or simply because the tree has become damaged, diseased or in a state of decline due to adverse growing conditions and old age. These trees will require an ongoing program of phased removal and replacement, in line with the council's Tree Risk Management Strategy.



## Capital projects

### Ash Die Back

The eventual implications remain difficult to assess. Current advice is that special care may be needed during felling operations, particularly where manual felling or removal is required. Heavily infected trees are often not safe to climb, significantly increasing costs associated with specialist equipment hire, in order to enable safe removal.

At the same time sanitation felling ahead of potential infection is both unpopular and difficult to justify in terms of environmental impact and cost. Whilst the extent to which Local Authorities will take on public safety felling of trees in unknown ownership is likely to be far less than that undertaken during the Dutch Elm Disease outbreak of the 1970s, there will be some instances where this will need to be addressed.

It remains the case that the disease outbreak could cost ECC an extra £50,000 to £150,000 per year for the next 5 years or longer. (ECC Ash Dieback Action Plan 2019).

## Revenue Position

Previous and planned budgets.

Year	Annual Revenue budget	Tree and woodland development projects	Annual revenue maintenance budget	Housing Staffing costs	Housing works	Ash Dieback	Public Realm Staffing costs
2019-2020	225,620 192,320	2,000	112,980	(33,300)	170,000	0	106,870
2020-2021	231,630 197,060	3,000	112,980	(34,570)	150,000	50,000	112,880
2021-2022	200000	10,000	150,000	(35,000)	140,000	50,000	114,000
2022-2023	210000	5,000	150,000	(35,500)	100,000	100,000	116,000
2023-2024	220000	3,000	150,000	(36,000)	100,000	100,000	118,000
2024-2025	221000	3,000	150,000	(45,000)		75,000	121,000

Estimated budgets include an increase for RPI costs, but a decrease over time to reflect less costly reactive works, improved efficiency, and a peak in terms of woodland planting capacity after 2023. Ash dieback measures are noted separately as potential capital funding as the revenue budget will not cope with the volume and complexity of Ash tree removal, based on current predictions and work practices.

## 10 year management plan

Arising from the detailed action plans for tree management within the city and the Greater Exeter area, a long-term plan for tree care, tree and woodland planting schemes, and cyclical woodland management will be developed. This will be undertaken in conjunction with partner organisations such as Devon Wildlife Trust and adjacent Local Authorities.

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## 9.0 Appendices

### 9.1 Policy and Strategy Links

#### **Exeter Corporate Plan**

The Corporate Plan 2022- 2026 has three strands:

- Healthy and active city
- Building great neighbourhoods and communities
- Net zero carbon city

The Tree and Woodland Strategy supports the Corporate Plan by promoting and enhancing carbon sequestration and negating the effects of air pollution, enhancing the amenity and recreational values of urban areas, and encouraging recreational activity in woodlands.

#### **Liveable Exeter**

Liveable Exeter is a transformational housing delivery programme identifying eight liveable neighbourhoods within Exeter. Active Design principles guide the key outcomes including 'Activity for All' and a network of multi-functional open space. The benefits of trees within local urban landscapes has been long established and this strategy will provide guidance on a resilient tree programme.

#### **England's Tree Health Resilience Strategy. Gov.uk 2018**

This strategy sets out plans to reduce the risk of pest and disease threats. It also sets out how to strengthen the resilience of our trees to withstand threats. The strategy includes a national action plan, which sets out what is already being done, what is needed to protect our trees, and the important benefits they provide.

#### **'A Green Future: Our 25 Year Plan to Improve the Environment', Defra, January 2018**

This 25 year environment plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.

One of the key objectives is “increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042”.

### **Exeter City Council. Ash Dieback Action Plan, May 2019**

This plan is to enable ECC to assess the current position and the potential effect of Ash Dieback in relation to the city and its inhabitants. The outcome of this assessment will assist in our response to avert risk and mitigate the inevitable environmental and ecological impact. This issue-specific plan sits alongside the broader Tree and Woodland Strategy.

### **Exeter City Council Tree Risk Strategy, May 2019**

This risk strategy was produced ahead of the Tree and Woodland Strategy to determine the extent of risk to which the council may be exposed, to identify gaps in the risk management system, and framed the management approach to controlling risk. This will be a live document subject to annual review. It will sit under the Tree and Woodland Strategy.

### **Local Plan – The Exeter Plan 2020- 2040 (draft 3<sup>rd</sup> round consultation)**

The Local Plan ‘Natural Environment’ objective relates to protecting and enhancing of Exeter’s Natural environment through the cities valley parks, River Exe, and natural greenspaces. Policy NE7 (pending public consultation) specifically references the requirement for developers to provide increases in the amount of Tree cover within Exeter to the 30% target. This Tree and Woodland strategy has contributed as a Supplementary Planning Document providing evidence for the development to date. It will continue to support Local plan policy objectives through the effective management and delivery of Exeter’s treescape, and through collaboration across the wider sub-region.

### **Planning and Local Development Framework (Core Strategy-Sustainability Appraisal Report 2012)**

Core Policies that are of particular relevance to trees and woodlands are:

- NE3 – This policy lays out a requirement for developers to apply a mitigation hierarchy to biodiversity loss, and compensate as a last resort to ensure a total target of 10% netgain as per legal requirements.
- NE4 – This Policy mandates that developers proactively protect, enhance and deliver multi-functional greenspaces, capable of delivering environmental, economic and wellbeing benefits.
- NE6 – Requires all development to increase the level of greening factor within Urban environments, including the use of trees, parks, and green roofs.

### **Live and Move Everyday Active Strategy 2022 Live Better, Move More, report 2019**

The Physical Activity Strategy 2019 provides the overall direction for increasing physical activity in Exeter, and a means of aligning other strategies, partnerships and initiatives to secure an Active Design/whole system approach.

The Trees and Woodlands Strategy will contribute to the Physical Activity Strategy 2019.

### **Parks and Green Spaces Strategy (Draft)**

These strategies provide the framework for provision, protection and enhancement of and parks and green spaces, and the protection and value of trees is referenced across all the strategies.

### **Exeter and East Devon Green Infrastructure Strategy, 2009**

This strategy was produced to provide specific opportunities to shape and deliver green infrastructure within the area of the study. The Green Infrastructure Vision is stated as: “Green infrastructure will help to create high-quality, attractive and functional places that will provide a setting for day-to-day living, enhance the character and diversity of the landscape and protect heritage assets that contribute to the area’s unique sense of place and cultural identity. It will enrich the area’s wildlife value by addressing the negative impact of habitat loss and fragmentation by promoting habitat enhancement and linkage. GI will also help to connect people to places by linking residents and visitors to leisure and work destinations along a network of safe and clearly-defined routes.”

This aligns with the aims and objectives of the Trees and Woodlands Strategy. More specifically, the following aims are mirrored in the Trees and Woodlands Strategy.

Aim 2: Reinforcing local identity and distinctiveness

Aim 3: Enhancing biodiversity

Aim 4: Strengthening community cohesion

Aim 5: Promoting health and well-being

Aim 6: Establishing multi-functioning green spaces

Aim 7: Managing the environment

### **Towards a Carbon Neutral Exeter, report July 2019**

The council has made a commitment to become carbon neutral by 2030. There are many measures that can be taken towards achieving this goal, but amongst those where a trees and woodlands strategy can contribute are:

- green corridors and safe off-road walking and cycling routes;
- tree planting to screen from vehicles and airborne pollution;
- the management, maintenance and planting of trees to absorb carbon dioxide; and
- the retention and improvement of green spaces as a haven from traffic.

## 9.2 Action Plan - actions to achieve themes.

- This table summarises all the action points in relation to the three themes of the strategy. Some action points are duplicated as they support more than one theme.
- Some action points will be ongoing, others will relate to a single project.
- Action points will change over the lifetime of the strategy.

Objectives	Actions
<b>Theme - TREES AND WOODLANDS</b>	
<p><b>Objective T1:</b> Increase the city's canopy cover from 24.5% to 30% within the next 20 years.</p>	<p><b>Action 1:</b> Increase tree canopy through tree planting, natural regeneration and caring for existing trees with particular focus on wards where canopy cover is identified as low.</p> <p><b>Action 2:</b> We will aim to increase our canopy cover from 24% to 30% within the next 20 years.</p> <p><b>Action 3:</b> Promote the planting of trees on private land. We will do this by sharing information about the importance of urban trees as well as offering tree planting advice and promoting and supporting initiatives that offer free or subsidised tree planting schemes.</p>
<p><b>Objective T2:</b> Age diversity – work towards a broader age distribution for trees and woodlands across the city.</p>	<p><b>Action 4:</b> Phased tree planting and removal to ensure that there is good representation of all age classes at both a local and city level.</p>
<p><b>Objective T3:</b> Species diversity - Establish a genetically diverse tree population at both a local and city wide scale.</p>	<p><b>Action 5:</b> Undertake tree planting and removal with a focus on creating a diverse mixture of species and genotypes.</p>
<p><b>Objective T4:</b> Species Suitability – Create a tree population that is well suited to the urban environment, local site conditions, and climate variation.</p>	<p><b>Action 6:</b> Source and select trees for planting that are well suited to the local site conditions, alongside the phased removal of trees that are not suitable or have become problematic as a result.</p> <p><b>Action 7:</b> Tree planting proposals will have to provide proof of adequate consideration for the tree's position in the landscape and the potential for any negative impacts. (Establishment through to maturity).</p>

Objectives	Actions
<p><b>Objective T5:</b> Tree inventory – Maintain a comprehensive tree inventory to help inform of management decisions and control risk</p>	<p><b>Action 8:</b> The council will continue to update its tree and woodland inventory in order to gain a better understanding of its tree and woodland resource.</p> <p><b>Action 9:</b> The council will Use i-Tree Eco Survey to set and maintain our understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately-owned trees across the city.</p> <p><b>Action 10:</b> We will risk assess trees using a recognised methodology (QTRA), set appropriate re-inspection intervals and keep records on the council’s tree database (Confirm) in accordance with the council’s Tree Risk Management Strategy.</p>
<p><b>Objective T6:</b> Natural assets - Gain a better understanding of the ecological structure and function of the urban forest and associated green infrastructure.</p>	<p><b>Action 11:</b> We will seek advice from, and work in collaboration with, local ecologists and nature conservancy charities such as Devon Wildlife Trust in order to gain a better understanding of the council’s green infrastructure, and the special management that is required in order to protect and enhance the wildlife that they support.</p>
<p><b>Objective T7:</b> Gain a better understanding of trees on privately owned land, within the city, and seek to beneficially influence management where such trees have a proportionately high influence on the locality.</p>	<p><b>Action 9:</b> The council will Use i-Tree Eco Survey to set and maintain our understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately-owned trees across the city.</p>
<p><b>Objective T8:</b> Develop further the 2009 Green Infrastructure Strategy to manage woodland in the Exeter hinterlands with other landowners for larger scale benefits such as macro-scale woodland renewal and new planting, habitat corridors, interconnecting woodlands, biomass development, and woodland management skills such as coppicing.</p>	<p><b>Action 9:</b> The council will Use i-Tree Eco Survey to set and maintain our understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately-owned trees across the city.</p> <p><b>Action 11:</b> We will seek advice from, and work in collaboration with, local ecologists and nature conservancy charities such as Devon Wildlife Trust in order to gain a better understanding of the council’s green infrastructure, and the special management that is required in order to protect and enhance the wildlife that they support.</p> <p><b>Action 12:</b> We will work in collaboration with council departments and local organisations that have an interest in the city’s urban forest.</p>

Objectives	Actions
	<p><b>Action 18:</b> The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.</p> <p><b>Action 21:</b> We will work towards creating a tree establishment plan that is influenced by canopy cover assessment, species and age diversity in order to meet canopy cover objectives.</p> <p><b>Action 27:</b> We will improve the ecological value of our woodlands by developing a woodland management plan that is focused on sustainability and ecological integrity whilst facilitating appropriate public access.</p>
<b>Theme - THE COMMUNITY</b>	
<p><b>Objective C1:</b> Develop collaborative working with organisations that have an interest in the city's trees and urban woodlands.</p>	<p><b>Action 12:</b> We will work in collaboration with council departments and local organisations that have an interest in the city's urban forest.</p> <p><b>Action 15:</b> We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.</p>
<p><b>Objective C2:</b> Promote and enable community involvement and neighbourhood action to develop local ownership, interest and understanding.</p>	<p><b>Action 13:</b> We will encourage community involvement and provide volunteering opportunity's allowing people to make a positive contribution to their surrounding area and help advance urban forest goals.</p> <p><b>Action 14:</b> The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.</p>
<p><b>Objective C3:</b> Actively promote appreciation and understanding of trees as a community resource with all tree owners – residents, farmers, and businesses to enable local initiatives to support the vitally important ecosystem that they provide.</p>	<p><b>Action 14:</b> The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.</p>
<p><b>Objective C4:</b> Develop Regional collaboration – Working in partnership with other local authorities, land owners and</p>	<p><b>Action 15:</b> We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.</p>



Objectives	Actions
NGOs that have an interest in developing the urban forest and large scale woodland regeneration.	
<b>Objective C5:</b> Enable cooperation, communication and enforcement to prevent damage to trees with regard to utility companies that operate within the city, and seek opportunities to plant new trees during utility upgrades.	<b>Action 16:</b> We will engage with utility companies to ensure that their operations do not have a negative impact on council trees. The council will provide channels for residents and communities to report damage or trees at risk from damage by others.
<b>Theme - DEVELOP A RESOURCE MANAGEMENT APPROACH</b>	
<b>Objective R1:</b> Ensure the city's trees and woodlands are actively and sustainably protected, managed and developed for future generations.	<p><b>Action 8:</b> The council will continue to update its tree and woodland inventory in order to gain a better understanding of its tree and woodland resource.</p> <p><b>Action 18:</b> The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.</p>
<b>Objective R2:</b> Assess and understand Canopy cover and set goals – to have a better understanding of existing canopy cover and to set an achievable canopy cover target for the future.	<p><b>Action 2:</b> We will aim to increase our canopy cover from 24% to 30% within the next 20 years.</p> <p><b>Action 8:</b> The council will continue to update its tree and woodland inventory in order to gain a better understanding of its tree and woodland resource.</p> <p><b>Action 9:</b> The council will Use i-Tree Eco Survey to set and maintain our understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately-owned trees across the city.</p>
<b>Objective R3:</b> Environmental equality – promote and ensure the benefits of the urban woodlands are available to all, particularly those in most need.	<p><b>Action 1:</b> Increase tree canopy through tree planting, natural regeneration and caring for existing trees with particular focus on wards where canopy cover is identified as low.</p> <p><b>Action 13:</b> We will encourage community involvement and provide volunteering opportunity's allowing people to make a</p>

Objectives	Actions
	<p>positive contribution to their surroundings and help advance urban forest goals.</p> <p><b>Action 17:</b> We will attempt to improve access to woodlands with particular emphasis on areas where public access opportunities have not been fully realised.</p> <p><b>Action 27:</b> We will improve the ecological value of our woodlands by developing a woodland management plan that is focused on sustainability and ecological integrity whilst facilitating appropriate public access.</p>
<p><b>Objective R4:</b> Develop a woodland management plan for all of the council's woodlands throughout the city, linking with adjacent landowners to optimise value.</p>	<p><b>Action 18:</b> The council will develop a woodland management plan to ensure that Council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.</p> <p><b>Action 27:</b> We will improve the ecological value of our woodlands by developing a woodland management plan that is focused on sustainability and ecological integrity whilst facilitating appropriate public access.</p>
<p><b>Objective R5:</b> Financial aid and grant funding – develop a funding scheme for tree and woodland establishment and management.</p>	<p><b>Action 19:</b> The council will seek to take advantage of any available financial aid and grants for tree and woodland establishment and management.</p>
<p><b>Objective R6:</b> Quality standards and resources – ensure that works are completed to the highest standard.</p>	<p><b>Action 18:</b> The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.</p> <p><b>Action 20:</b> We will manage ECCs trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.</p> <p><b>Action 31:</b> All planting stock must be procured from trusted nurseries that adhere to the highest biosecurity practices (quarantine and isolation) and have a plant passport or phytosanitary certificate as required.</p>

Objectives	Actions
	<p><b>Action 32:</b> Staff, partner organisations and contractors will be expected to follow the highest biosecurity practices and stay up to date with the latest government advice and recommendations.</p>
<p><b>Objective R7:</b> Tree establishment planning and implementation – Investment in tree establishment using a systematic, planned and methodical approach.</p>	<p><b>Action 21:</b> We will work towards creating a tree establishment plan that is influenced by canopy cover assessment, species and age diversity in order to meet canopy cover objectives.</p>
<p><b>Objective R8:</b> Site suitability – matching species to location to optimise tree cover, establishment and development to maturity.</p>	<p><b>Action 22:</b> We will ensure that newly planted trees have sufficient growing space and suitable growing conditions so that they can reach their genetic potential and thus maximise the benefits that they provide.</p>
<p><b>Objective R9:</b> Tree protection policy, promotion and enforcement – ensure adequate measures and resources are in place for tree protection and protection enforcement.</p>	<p><b>Action 23:</b> There will be a presumption against the cutting down or pruning of a protected tree. Where permission is granted the Council will seek impose conditions requiring that a replacement trees is planted.</p> <p><b>Action 24:</b> The council will seek to prosecute anyone who illegally damages or destroys public or private trees.</p> <p><b>Action 25:</b> Trees that could be impacted by a new development will be assessed and evaluated by an arboriculture’s with reference to British Standard BS5837: <i>Trees in relation to design, demolition and construction – recommendation</i> as part of an informed decision making process.</p>
<p><b>Objective R10:</b> Undertake best practice management of publically owned trees, woodlands and natural assets.</p>	<p><b>Action 20:</b> We will manage ECC’s trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.</p> <p><b>Action 26:</b> The council will manage its trees in accordance with industry standards and best practice to ensure that council trees are in good physiological and structural condition in order to promote longevity and maximise ecosystem services.</p>

Objectives	Actions
	<p><b>Action 18:</b> The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.</p>
<p><b>Objective R11:</b> Develop and maintain a proportionate, resilient and defensible system of tree risk management.</p>	<p><b>Action 10:</b> We will risk assess trees using a recognised methodology (QTRA), set appropriate re-inspection intervals and keep records on the council’s tree database (Confirm) in accordance with the Council’s Tree Risk Management Strategy.</p> <p><b>Action 28:</b> The council will manage tree risk in accordance with its Tree Risk Management Strategy following the latest industry guidance (NTSG) and using a well-recognised and accepted risk assessment methodology.</p>
<p><b>Objective R12:</b> Ensure a reasonable and defensible approach to tree risk management</p>	<p><b>Action 10:</b> We will risk assess trees using a recognised methodology (QTRA), set appropriate re-inspection intervals and keep records on the council’s tree database (Confirm) in accordance with the council’s Tree Risk Management Strategy</p> <p><b>Action 20:</b> We will manage ECC’s trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.</p> <p><b>Action 28:</b> The council will manage tree risk in accordance with its Tree Risk Management Strategy following the latest industry guidance (NTSG) and using a well-recognised and accepted risk assessment methodology.</p>
<p><b>Objective R13:</b> Maximise wood and green waste utilisation, and working with a range of owners, governing bodies and contractors to promote this</p>	<p><b>Action 30:</b> The council will seek to recycle and utilise all arising from tree works operations.</p>

## 9.3 Exeter City Council – Tree Risk Strategy

### Exeter City Council – Tree Risk Strategy

#### Executive Summary

The Council owns many trees and recognises and values the benefit that they bring to the City. Trees do pose a risk to safety but generally the risk to human safety is very low and this risk needs to be considered in balance with the benefits that they provide.

Research has shown that trees provide a range of social, environmental and economic benefits including:

- Improve air quality through the Interception and capture of atmospheric pollution.
- Carbon capture and sequestration.
- Urban cooling through shade and evaporation.
- Flood mitigation through interception, storage and transpiration of rain of rainwater.
- Noise abatement.
- Reduced wind speed
- Improvement of human health and wellbeing.
- Wildlife habitat
- Softening of the hard landscape.
- Trees have the potential to increase property values by up to 18%, and in streets lined with mature trees house sales complete faster.

The Council will undertake routine inspection of their trees in a cost effective way to ensure that the limited tree budget is spent as effectively as possible. Trees that are in the busiest locations (e.g. those next to roads, buildings, busy paths) will be inspected more regularly than those in less used places. All trees will be assessed over a 5 year period according to their priority in relation to public safety.

This approach accords with the current national guidance published in:

Common Sense Risk Management of Trees – The National Tree Safety Group (NTSG).

This strategy allows a proactive management of the Councils trees and safety management will be prioritised over complaints of nuisance from the public unless there is an urgent need for the works. It is vital that the limited budget is spent according to the priority of the works and public safety is the Councils key duty.

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1.0 Mission Statement:

1.1 Trees provide a wide range of benefits to society and the Council recognises the many benefits of trees to the quality of the City. A balance is needed between the need to manage the risk they pose whilst maximising the benefits to the community. The strategy ensures that the Council owned trees are part of a routine inspection programme that is reasonable and cost effective whilst meeting the Councils duty of care to local residents, visitors and employees balanced against the intrinsic value of the trees.

2.0 Service – scope and standards

2.1 Scope:

2.1.1 The strategy relates to trees within Council ownership only and to those trees under day to day Council control (trees on leased land may be excluded due to the provisions or requirements of the lease).

The strategy will integrate the routine inspection of trees with day to day queries (emergency response and general complaints) and ensure that works are prioritised according to need.

The strategy follows current best practice and the following documents or information sources have been used in the development of this strategy document:

- Common Sense Risk Management of Trees – The National Tree Safety Group (NTSG).
- Quantified Tree Risk Assessment – QTRA Ltd.
- Tolerability of Risk Framework - Health and Safety Executive (HSE).

The document has also taken into account the current legal position (both statute law and common law) and how these relate to the Duty of Care placed on landowners.

The tree risk strategy aims to target resources to reduce the risk posed by trees where the risk is identified as being at its greatest – this is a prioritised system.

2.1.2 This enables the Council to ensure that the tree budget is allocated according to need taking into account a full range of factors. The strategy also ensures that money is spent where the risk is greatest and to avoid reactive spending where those trees pose a low risk of harm.

2.2 Prioritisation of risk:

2.2.1 The law requires only that the Council should “take reasonable care to avoid acts or omissions which cause a reasonably foreseeable risk of injury to persons or property”. This strategy aims to ensure that the prioritisation of inspections is reasonable and that the Exeter City Council meets their duty of care. In order to achieve this it is necessary to prioritise inspections as many of the trees within the Councils ownership pose a very low risk of harm.

However, many others are in locations where the land use is high and it is important that there is a systematic method of inspecting the trees, according to their priority, to ensure a reasonable approach is taken and that budget is allocated according to need.

The NTSG document states:

**Defendable Practice**

A key objective for most owners and managers is to maintain a defendable position at the lowest cost while avoiding undesirable loss of valued trees. Defendable management is consistent with a duty of care based on reasonable care, reasonable likelihood and reasonable practicability. Landowners and managers who know how important their trees are tend to take an interest in them; including their setting and how people use their land, the benefits that trees bring and their structural features. It is reasonable that decisions regarding tree safety are considered against a background of the general low risk from falling trees. Being reasonable involves taking actions proportionate to the risk. This inevitably involves a judgment for owners, duty holders and advisers. Reasonable tree management has both reactive and proactive elements. While the owner or manager may need to react to events involving dangerous trees as they arise, it is also prudent to have forward-looking procedures to keep tree-related risks at an acceptable level. These procedures do not need to be complicated and may be incorporated into a tree strategy where applicable.

- 2.2.2 Both the NTSG publication (Common sense approach to risk management of trees, 2012) and the Quantified Tree Risk Assessment system (QTRA) advocate a prioritisation based on the use of the site or the area under trees or within striking distance of the trees (commonly known as the Target Area) as the starting point for a priority based system. Simply put trees within busy places, or close to buildings, pose a higher risk due to the number of people using the site.
  - 2.2.3 Trees naturally shed branches or parts and this only poses a risk to public safety when people are using the area where the part falls. Any inspection programme needs to focus resources on the areas of the greatest use where trees are most likely to injure people or damage property. This is a reasonable approach.
  - 2.2.4 The QTRA system provides a robust method of prioritising targets according to site use. Arguably this is the strongest part of the system and the target evaluation method has been adopted here as it is simple to implement and is transparent in how it works. The system has also been peer reviewed and adapted following user input.
- 2.3 Risk of Harm (Risk Index):
- 2.3.1 A risk index will be used to prioritise works. This is a method of determining the importance of the necessary works to minimise the risk posed to people or property.

The QTRA system produces an 'output' that is called the Risk of Harm and is defined as follows:

**Risk**



Risk is the combination of the probability of an event and its consequence (Anon. 2009). In terms of assessing risks from falling trees and branches, the commonly quoted equation 'risk = likelihood x consequence' is appropriate e.g. risk is the product of (1) the likelihood that the tree will fail in the coming year, (2) the likelihood of the target being occupied, and (3) the magnitude of the expected consequence.

### Risk of significant harm

The QTRA output is termed the Risk of Harm and is a combined measure of the likelihood and the consequence of tree failure considered in terms of the loss, within the coming year, of a human life, something of comparable value or a proportion thereof.

Using the QTRA system a risk index is produced as follows:

Target occupation x size of the part x probability of the part failing = the Risk

The Risk Index is actually based on quantified measures of the three components (above) and produces a probability. This allows the risk to be measured against Health and Safety Executive (HSE) guidance that quotes different levels of risk as a probability (see Figure 1 below).

The above method also pays regard to HSE guidance relating to the 'Tolerability of Risk Framework' and the NTSG guidance.

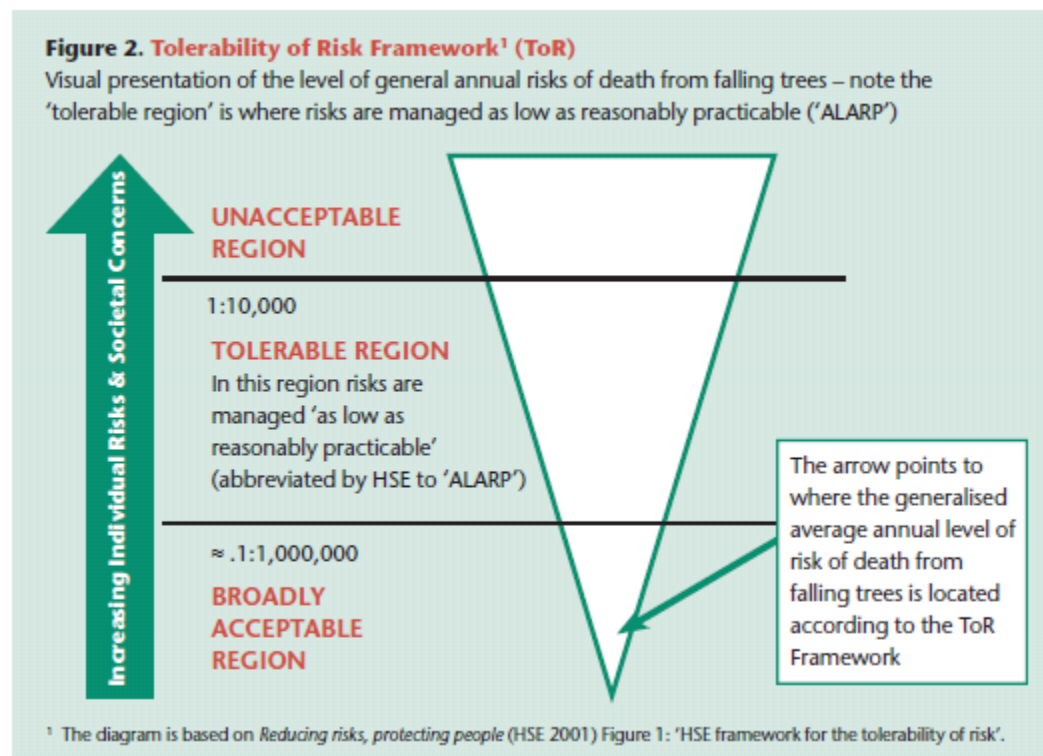


Figure 1 - Excerpt from NTSG Common Sense Risk Management of Trees 2011.

2.3.2 The HSE guidance also advises that any residual risks are not unduly high and that they should be kept as low as reasonably possible (ALARP).

### ALARP (As Low As Reasonably Practicable)

Determining that risks have been reduced to 'As Low As Reasonably Practicable' involves an evaluation and comparison of both the risk to be reduced and the sacrifice or cost involved in reducing that risk. If it can be shown that there is gross disproportion between

them, the risk being insignificant in relation to the sacrifice or cost, it can be demonstrated that to reduce the risk further is not reasonably practicable.

The NTSG guidance states (in relation to acceptability of risks) that:

Accordingly the HSE has identified that an individual risk of death of one in one million per year for both workers and the public corresponds to a very low level of risk, and this should be used as a guideline for the threshold between the broadly acceptable and tolerable regions. It points out that this level of risk is extremely small when compared with the general background level of risk which people face and engage with voluntarily.

2.3.3 Therefore, the QTRA system has been adopted as part of the Risk Strategy as it provides a clear measure that both uses and corresponds to the HSE and NTSG advice. Tree works will be prioritised accordingly. The QTRA user manual (V5. 2018) is attached as an appendix to this document to avoid replicating its methods in this strategy (the user manual defines the parameters of the system).

## 2.4 Standards:

2.4.1 Tree works that are required to maintain the Councils tree stock will be carried out in accordance with BS3998:2010 (Tree Work Recommendations), wherever possible, to minimise the long term impacts of tree surgery work both in terms of the risk they pose and the ongoing maintenance costs.

2.4.2 In general terms the greater the level of tree surgery works that are undertaken to any specific tree the higher the long term maintenance costs. Heavy tree surgery tends to result in a requirement for ongoing management works, or introduce defects that require regular pruning works to prevent failure (e.g. topping) and minimise risk. This is species and individual specific but it is desirable to limit the extent of tree surgery works for several reasons.

2.4.3 Recommended works will seek to minimise the level and extent of tree surgery to minimise costs and risk.

## 3.0 System implementation and parameters – Performance Indicators

3.1 It is important that the risk strategy is robust and easily audited with clearly identified outcomes. A set of performance indicators (clear outcomes) are set out below and the implementation of these will be checked and audited on an ongoing basis. Following review changes will be implemented to adjust the system accordingly.

3.2 The performance indicators are:

- A comprehensive record will be kept of all tree inspections.
- Inspections and subsequent tree surgery works will be recorded on the tree database (Confirm).
- The inspections will be phased so that every tree (or group of trees) will be inspected at least once over a 5 year period. The frequency of inspection will depend on the use of the area and the risk

posed by specific individual trees. All trees will be inspected within the designated timescale for each tree or risk zone (see zoning).

- All tree surgery works will adhere to current best practice where possible and unless there is an overriding justification not to.
- All urgent tree works will be undertaken within the specified timescale i.e. within 1 week.
- Non urgent works will be undertaken on a priority basis. Works will be prioritised according to need or by using the QTRA risk index i.e. the higher the risk posed by the defect the quicker the work will be done. Non urgent works will be reviewed every three months and carried out according to priority and budget.
- The risk zones will be reviewed at least every 5 years or following an inspection or where additional information that reveals a higher or lower use of the site.
- The inspection rota will be reviewed every 3 months to ensure that the annual and 3 monthly target of sites to be inspected is met.
- The whole strategy will be reviewed annually and any necessary actions will be programmed and implemented with a clear timescale or deadline set.
- All staff will be trained according to need and the training programme. All inspectors will be adequately qualified and experienced. Inspectors will be trained in Basic Tree Inspection as a minimum. Inspectors should be working toward Professional Tree Inspection level.

#### 4.0 Site zoning – risk zoning and mapping

##### 4.1 The NTSG document (Common Sense Risk Management of Trees, 2011) states:

###### **Key steps in tree safety management**

The essentials:

A reasonable and balanced approach forms the basis of a tree safety strategy for sensible tree safety management. By a “strategy”, we mean a plan that guides management decisions and practice, in a reasonable and cost-effective way, typically covering three essential aspects:

- Zoning: appreciating tree stock in relation to people or property
- Tree inspection: assessing obvious tree defects
- Managing risk at an acceptable level: identifying, prioritising and undertaking safety work according to level of risk.

##### 4.2 In order to ensure that the available budget is allocated properly and that the Council is inspecting the trees appropriately the different sites will be zoned according to use.

### 4.3 Risk zones

- 4.3.1 An initial, desk based, zoning exercise was undertaken to prioritise which the inspection regime for sites. Whilst this was a useful starting point and allowed for a reasonable starting position, it was essential to revise the zoning on a site by site and tree by tree basis during the inspections. In addition the date of the last inspection was considered when determining which sites to assess – older sites were generally looked at first to bring the whole inspection rota back into order.
- 4.3.2 The initial approach is being refined during inspections. The inspector will assess the target zone during the site inspection and correct or alter where necessary, based on site observations.
- 4.3.4 Any risk assessment valuation system can be used in conjunction with this strategy and where trees are identified as having the potential of posing an unacceptable risk this will be refined using a recognised system (e.g. Quantified Tree Risk Assessment system (QTRA Ltd)). Any system that is used must correspond with the advice in the NTSG guidance. The broad categories above provide a simple and easily used approach and the categories can be calculated utilising the Councils existing GIS data and system.
- 4.3.5 Where an inspector finds a tree that may pose an unacceptable risk consideration is given to if and how the risk can be made ALARP.
- 4.3.6 The greatest risk to public safety has proved to be from trees within falling distance of where people move at speed in vehicles (NTSG). Therefore, roads are considered to be high priority targets especially where the use is high or where speeds are fast. The City does include numerous quiet rural lanes and roads which will also be prioritised according to use and the factors in 4.4.2.
- 4.3.7 Resources will be allocated to address high risk trees first but with scope to address high nuisance trees where these are causing an unacceptable disturbance e.g. highway clearance. There is flexibility within the system to allow allocation for cost effectiveness for management purposes i.e. if inspections reveal management works that will reduce long term costs these will be considered if funds permit.
- 4.3.8 The initial spreadsheet used to undertake the zoning exercise was updated as a secondary record following the inspection of a site. This will be superseded over the first five years by the Confirm database as it is essential that this is the primary record and the tool to determine future inspections.

#### 4.4 Frequency of inspection

4.4.1 The NTSG guidance does not specify a frequency of inspection and states that this is a decision for the landowner to make. The Council needs to balance the cost of inspections, the available resources (time and cost) against the risk posed by the trees.

4.4.2 The re-inspection frequency will be determined by:

- The use of the site or part of the site influenced by the tree.
- The age and size of the tree.
- The species of the tree.
- The presence of existing defects

4.4.3 All of the above are relevant factors in determining the risk posed by trees as, for example, a young beech tree will pose a much lower risk than a large mature one, in the same location, and may not require as frequent an inspection. The database will then be used to ensure that sites due for re-inspection are assessed in line with their inspection date. Due to workloads it may not always be possible to inspect the tree(s) on the precise month that was recommended. They will be inspected as close to that as reasonably practicable.

4.4.4 The surveyor will refine the frequency of inspection using the re-inspection date in the Confirm database.

4.4.5 The zoning is based on an initial desk based exercise which is a reasonable initial approach. Any high risk trees that are identified on a day to day basis will be re-prioritised accordingly.

4.4.6 The inspection rota will be managed using the Confirm software based on the inspectors recommendation, so as to identify trees requiring annual inspection and then those that can be inspected on a two, three, four or five year basis with an inspection occurring at least once in the five year rota.

4.4.7 Low risk sites / areas may include high risk trees and this is an unavoidable consequence of a target led system. However, during routine inspections of site high risk trees will be prioritised on a different inspection frequency.

#### 4.5 Level of inspection

4.5.1 It is possible to assess the risk posed by trees using different level of inspections. Trees in locations with very low use may not require detailed inspection and the level of risk can be reasonably assessed following a brief walkover survey with a preliminary visual assessment.

4.5.2 Surveys will be conducted using the Visual Tree Assessment Methodology (Mattheck & Breloer 1994) and will be ground based assessments.

4.5.3 Where the survey identifies potential hazards that require further assessment this will be recommended by the surveyor and the tree will have a detailed inspection or climbing inspection. This will be carried out in the timescale specified by the inspector and according to priority.

4.5.4 Walkover surveys will be used on general site visits (following routine queries) as a quick method of assessing if any potentially high risk hazards are present. Walkover surveys will also be used for woodlands and trees in groups.

- 4.5.5 Detailed inspections – to be carried out using decay detection equipment if appropriate or using suitable tools (e.g. trowel, airspade etc).
- 4.5.6 Climbing inspections – where a defect in the canopy on a section of the tree that may lead to harm cannot be assessed then a climbing inspection will be undertaken and the results recorded on the tree record. The climber will be competent in tree inspection and will record the size and location of defects using photos where required. A climber could also be directed by a more experienced operative on the ground.
- 4.5.7 Other Council members of staff will also report problems e.g. Parks and Open Spaces teams, Engineers, Housing Officers when they observe problems arising from high winds etc or during routine visits to sites. The reporting of defects from site managers provides an important role in the risk strategy in the time between the routine inspections.

#### 4.6 Recording of information

4.6.1 All information will be recorded on the Councils tree database (Confirm software). The individual record for each tree will be updated and the basic information checked (heights, spreads, age class, trunk diameter etc.) during routine surveys. The updating of information is important as the data is used in the zone calculation.

4.6.2 Every year there will be an update of the Risk Zones and inspection prioritise program.

#### 4.7 Level of data collection:

4.7.1 Individual trees will have a unique record in the database and this will be updated following or at the time of inspection. Inspectors will use hand held devices with the Confirm software to capture data.

4.7.2 Groups or woodlands will be assessed as a unit with a single record for each group or woodland. A walkover survey will be conducted of groups or collection of trees. Where an individual tree within the group or woodland requires particular attention or poses a different (higher) risk than the collective a unique record will be created e.g. large trees on a woodland edge growing next to a busy road may be picked up individually. The collective database record will be updated at or immediately following the inspection.

4.7.3 In some instances individual trees within woodlands have been recorded but due to dense canopy cover GPS accuracy was poor and the position was marked by eye. Several years later the location of these trees can be very difficult to determine. Where this is the case a new record is created for the woodland or group unit, as appropriate. All trees are assessed but the type of record altered to suit changing circumstances.

#### 4.8 Risk Control Measures

4.8.1 Where tree works are identified the following measures will be considered:

- Tree removal
- Tree pruning
- Bracing or propping – in conjunction with pruning and after an assessment of the tree.
- Signage – where warning sign may be the reasonable measure to reduce the risk.
- Public awareness – interpretation boards or signs that may aid public understanding of risk – e.g. signs advising the public to be wary of entering sites during extreme weather conditions.
- Site closure – where appropriate or enforceable.
- Target control – excluding access using fencing, dense planting or vegetation management, moving footpaths.

4.8.2 The risk control measure will minimise the risk posed to an acceptable and reasonable level. Risk cannot be removed entirely and a balance will be made between risk reduction and the benefit provided by the feature.

#### 4.9 Personnel

- People who hold the Professional Tree Inspectors Certificate or who have appropriate qualification and/or experience.
- Site managers or Council staff who can report defects or queries relating to trees.
- 

#### 4.10 Training

4.10.1 All formal inspectors will be trained in the QTRA system and be a licensed user as a minimum requirement.

4.10.2 All inspectors will be aiming for Professional Tree Inspector standard (LANTRA accreditation / certificate of competence).

4.10.3 Other Council staff (e.g. site managers) who may report problems or queries between formal inspections do not require specific training. A number of council staff have undertaken Basic Tree Inspector Training to allow them to identify basic defects. Exeter City Council will run training events for key members of staff so that they are able to identify hazardous trees, which will then be reported to the Tree Team for further investigation.

#### 5.0 Prevention of future risk

5.1 The risk strategy aims to reduce the risk posed by trees on an ongoing basis where reasonably practicable. This will be achieved by regular review of the implementation of the strategy and through other management measures.

#### 5.2 Tree planting

5.2.1 The requirement for tree surgery can be reduced over the long term by careful tree species selection when undertaking new planting. Where new planting is required or desirable careful consideration will be given to the choice of planting species. The selected species needs to meet the long term objectives of the site, have the opportunity to fulfil its true potential and provide all the possible benefits. Consideration will be given to the following:

- Soil – The condition and type of soil needs to be considered when making the choice about which species to plant and if any improvement need to be made prior to planting.
- The above and below ground space available – including proximity of adjacent buildings, roads, footpaths, services and other structures.
- Site orientation and available light – will the planting be to the south of inhabited structures or will it dominate a particular feature near it?
- The shape of the proposed tree in relation to the space e.g. spreading, fastigiated etc.
- The ultimate size of the tree – is the tree a large, medium or small species.
- Species characteristics – does the species have a tendency to shed branches, have high volumes of fruit, have a rooting pattern that may damage surfaces or structures, is the species especially shade bearing? Planting should avoid using species with known problems where that may conflict with the site use.
- Will the planting location block views?
- Is there the opportunity to broaden the age structure with a view to creating a varied and sustainable canopy cover for the location?
- On sites where monocultures exist, can the tree stock be diversified by introducing a mixture of species and therefore improving the resilience to pest, diseases and climate change?
- Tree planting should be carried out in accordance with British Standard BS8545\_2014.

5.2.2 Consideration of the above should lead to the most suitable tree being chosen for the site and reduce potential nuisance factors that lead to pressure for inappropriate tree surgery. Ideally trees would only require minimal pruning over their lifetimes reducing risk and management costs. Given sufficient space trees can shed parts naturally without leading to a high or unacceptable risk. This aim can be achieved via sensible plant selection.

### 5.3 Formative pruning

5.3.1 Many defects that lead to tree failure when trees are mature can be removed by routine formative pruning in the early years of a trees life. The aim of formative pruning should be to produce a tree that has a branch structure which is mechanically sound and generally free from potentially hazardous features.

5.3.2 Trees are generally more able to cope with pruning when young compared to pruning them at maturity. Pruning mature trees tends to lead to the formation of extensive decay and defects increasing the risk they posed, thereby increasing management costs.

5.3.3 Pruning young trees formatively can address inherent weaknesses and form a crown shape that prevents trees conflicting with nearby features e.g. roads or buildings. Formative pruning is cheaper than pruning mature trees and involves less risk from tree surgery operations (lower use of chainsaws and removal or large limbs).



- 5.3.4 Many structural defects arise from poor nursery practice (or the inherent method of growing trees close to together). Formative pruning needs to start in the nursery so plant selection is important.
- 5.3.5 During the inspection of the Councils tree stock young trees will be inspected to record their location, species etc. as part of the tree database. The inspection will also include an assessment of their structural condition and formative pruning will be carried out to promote a defect free structure and with growth encouraged to clear structures by the time the tree reaches maturity (first 50 years).
- 5.3.6 The following actions will be taken (Performance Indicator):
- New trees will be inspected on delivery from the supplier – any trees with a poor or unacceptable structural form (trees not complying with BS3936 part 1 or other current guidance) will be rejected.
  - Young trees will be formatively pruned after establishment (at least two years after planting and once they are in a good physiological condition) to:
  - Remove or suppress weak branch unions.
  - Remove crossing branches that will cause structural weakness
  - Select a clear single leader – secondary or aggressive growth will be shortened to sub-dominate (suppress) or removed.
  - Remove branches along the main stem to create a widely spaced structure.
  - Suppress the temporary lower crown where the branches may develop to obstruct features like roads or buildings or become excessively long or heavy.
  - Prune storm damaged trees to prevent failure in later life.
- 5.3.7 Live growth will be removed to create a good structure. The physiological condition of the tree needs to be assessed before any pruning is recommended. Ideally trees will be pruned when they are in the optimum condition to respond well to the loss of leaf material.
- 5.4 Failure Log
- 5.4.1 As part of the ongoing monitoring of the Councils tree stock a failure log will be kept and maintained. This will enable patterns to be seen relating to:
- 5.4.2 Particular species that have a tendency to fail.
- 5.4.3 Areas where tree failure may be highest or where 'hot spots' of failure may occur.
- 5.4.4 Collection of the data will help to inform estimation of real risk levels (as opposed to purely surveyor estimated risk) and see patterns of tree failure. The data can be correlated and analysed to help future priority setting and inform management decisions relating to budget allocation, species choice etc.
- 5.4.5 The failure log will include:
- Tree species
  - Age class
  - Location
  - Weather conditions at the time of failure

- Specific type of failure
- Contributory factors
- How foreseeable the incident was prior to failure
- Action taken following failure

5.4.6 Appendix 3 includes an example of the failure log and in addition a spreadsheet or database will be kept of failure to allow easier analysis.

5.4.7 In practice this has been difficult to implement whilst responding to storm related events especially when this has led to multiple issues across parts of the city. Location seems to be a more important issue than species – the direction of wind and the proximity to coastal areas seem to be more likely to influence damage or failure than species.

## 6.0 Review

6.1 The Risk Strategy will be reviewed annually and this will be a full review of the contents and implementation.

6.2 The annual review will assess the effectiveness of the strategy by ensuring that an adequate number of trees and sites are being inspected and that appropriate works are implemented.

6.3 The annual review will consider any accidents, failures and near misses that have occurred and what measures are required to reduce risks.

6.4 The annual review will also include:

- Zoning – the risk zone allocation will be reviewed and any sites where the zoning is thought to be incorrect will be amended.
- Inspections – the review will assess the effectiveness of the inspection program / rota. If all the sites on the rota for that year have not been inspected then the suitability of the rota will be assessed and modified as necessary.
- Performance Indicators – the review will ensure that the PI are being met.
- Benchmarking – the strategy will be measured / assessed against another organisation of a similar size and type.
- The Risk Strategy will be amended to take into account any changes in best practice or legislation.

6.5 A three monthly review of the inspection rota will be carried out to assess if an adequate number of sites is being inspected each month / 3 month period.

## 6.6 Complaints and work requests from the Public

6.6.1 The aim of the strategy is to ensure that limited funds are spent as efficiently as possible. The Council will not prune or fell trees due to the minor nuisance that they pose unless the nuisance is excessive or breaches legislation e.g. highway clearance and / or the nuisance cannot be resolved by other means.

6.6.2 In general the Council will not prune trees for the following reasons:

- Shading or loss of light
- Domination of houses or gardens
- Television reception
- To gain views.
- Leaf Fall

7.0 Internal Audit

7.1 The Strategy will be assessed internally by Environment and City Management Manager.

7.2 Areas that pose a risk to the system will be assessed e.g. budgets, resources etc.

7.3 Each part of the system will be audited / assessed to see if it is functioning correctly with an assessment every three months with a full review annually.

7.4 Any deficiencies in the system will be reported to the Tree Manager for with a recommendation for improvement.

## 8.0 References / Bibliography

Mattheck K & Breloer H, The Body Language of Trees, Department of the Environment 1994.

Lonsdale D Dr, Principles of Tree Hazard Assessment and Management, Department for Transport Local Government and the Regions, 1999.

Common Sense Risk Management of Trees – The National Tree Safety Group (NTSG).

Quantified Tree Risk Assessment – QTRA Ltd, User Manual V3.05 2012.

Appendix 1 Failure Log – example form for collecting data





<b>Date:</b>	<b>Location:</b>	
<b>Tree Species:</b>	<b>Age Class:</b> Y / EM / MA / M / OM / VET	<b>Ezzytreev Ref:</b>
<b>Weather conditions at time of failure:</b>		
<b>Specific type of failure – describe:</b>		
<b>Contributory Factors (if any):</b>		
<b>Was the failure foreseeable?</b>		
<b>Did the failure lead to damage to property or injury of people?</b>		
<b>Action taken:</b>		
<b>Officer:</b>		
<b>Failure Log Spreadsheet updated (Date):</b>	<b>Confirm Record updated (date):</b>	

Tree Risk Assessment Appendix 2 – Quantified Tree Risk Assessment

**A Non-technical Summary** Tree safety management is about limiting the risk of harm from tree failure while maintaining the benefits conferred by trees. Although it may seem counter-intuitive, the condition of trees should not necessarily be the first consideration. Instead, tree managers should first take account of the usage of the land on and around which the trees stand, and this in turn will inform the process of assessing the trees.

The Quantified Tree Risk Assessment (QTRA) method applies established and accepted risk management principles to tree safety management. Firstly, the targets (people and property) onto which trees could fail are assessed and quantified, thus enabling tree managers to determine whether they need to assess trees and to what degree of rigour an assessment or inspection of the trees is required. Where necessary, a tree or branch is then considered in terms of both its size (potential impact) and probability of failure. Values derived from the assessment of these three components (target, size and probability of failure) are combined to calculate a risk of harm within the coming year. The year is simply a convenient time-frame over which to measure the risk and does not in itself infer that the risk should be re-assessed annually; rather the frequency of re-assessment should be informed by the level of risk and the characteristics of the tree population and land-use.

The quantification of risk is not the only consideration when managing tree safety. The financial cost of reducing the risk and the potential loss of the many benefits from trees should be accounted for when making risk management decisions. By quantifying the risks we can more readily assess this balance.

	<b>Broadly Acceptable</b>	Do nothing.
	<b>Tolerable</b>	Do nothing, unless you expect the risk to increase significantly before the next assessment. The benefits conferred by the tree will usually outweigh the risk.
	<b>Tolerable</b>	Reduce the risk unless there is broad stakeholder agreement to retain it.
	<b>Unacceptable</b>	Reduce the risk.

(QTRA - a non-technical summary V5.2.3 2018)

## **Appendix 2 Exeter City Council, 2019. Ash Dieback Action Plan**

This plan is to enable ECC to assess our current position and the potential effect of Ash Dieback in relation to our city and its inhabitants. The outcome of this assessment will assist in our response to avert risk and mitigate the inevitable environmental and ecological impact.

This document lays out the Ash Dieback Action Plan for Exeter City Council:

- About Ash Dieback and the need for the toolkit
- Benefits of Trees and Woodlands
- General management advice
- Ash Trees in the UK/ Region/ County/ Area
- Potential impact of Ash Dieback on landscape and biodiversity in Exeter City
- Potential impact of Ash Dieback on local landowners, land managers and homeowners
- Potential impact of Ash Dieback on local utilities and infrastructure organisations
- Potential impact of Ash Dieback on your organisation and the potential financial implications
- Recovery from the effects of Ash Dieback

In addition, a Delivery Plan is set out which covers:

- Production of a baseline ash tree survey.
- Establishing a multi-agency structure.
- Reviewing current legal practice.
- Developing a risk management plan.
- Producing a publicly available local bio-security tool-kit / guidance for ash dieback.
- Developing and running local training.
- Producing a communications strategy and public information.
- Developing an Ash Dieback recovery plan.
- Creating measured systems to monitor and assess the spread of ash dieback.
- Preparing and developing a tree strategy to ensure preparedness for future tree diseases.

Key Findings, Recommendations and Actions:

- Only trees with an intolerable ratio of risk of harm are recommended appropriate works.
- Exeter City Council manages an estimated 200,000 trees of which there are 465 plotted ash, however this figure is likely to be far greater as many of the trees have not yet been individually recorded. In addition to this the council owns and manages approximately 40 hectares of broadleaved woodland.
- Homeowners taking felling operations into their own or untrained hands will be at greater risk due to the disease.
- Summer 2019 will give us a more conclusive idea of the progression within the city.

- This disease outbreak could cost ECC an extra £50,000 to £150,000 per year for the next 5-10 years.
- The existing Tree Risk Strategy will provide a means of managing the risks that infected trees pose to people and property.
- Our web document will be updated as and how the spread of the disease progresses.
- A document will be released on our internal news site aiding symptom recognition along with a facility for notifying our Tree Team.
- Tolerant and resistant trees should be retained, as should a proportion of dying or dead trees where it is safe to do so.
- Identify positions within the city for re stocking and doubling our planting numbers in advance of the biodiversity loss.
- Further plotting of ash on our existing mapping system and database alongside the use of a spreadsheet that accounts for dates, locations and numbers of trees lost to the disease.
- Our tree strategy will incorporate our reaction to the impact of events such as this.

### Appendix 3 Ash Dieback and Dutch Elm Disease

Ash dieback is caused by the airborne fungus *Hymenoscyphus fraxineus* that is thought to have originated in Asia. The disease was first recognised in Europe in the 1992 and has spread across the continent, causing devastation to the ash tree populations in its path. Ash dieback was first recorded in the UK in 2012, although it is now thought that it is likely to have been here for a decade before that. The disease now affects most parts of the UK and it is becoming established in Exeter's hedgerows, trees and woodlands.

It is expected that Exeter, as with the majority of the UK, will lose between 50-85% of its native tree species *Fraxinus excelsior*, the Common Ash tree and its variants.

*The common ash (Fraxinus excelsior) is one of our most important and prolific native tree species. The species accounts for 12% of broadleaved woodland in Great Britain and is commonly found in parks, gardens and hedgerows. They grow in a wide range of soils and climatic conditions, fulfilling roles in terms of amenity and ecosystem services, whilst providing valuable habitat for a wide range of species. There are 955 species associated with ash trees, of which 45 are believed to have only ever been found on ash (Sankus. M, 2019)*

Ash is a common species around Exeter and elsewhere in the UK. The council has approximately 465 plotted Ash trees (June 2018), however, this figure is likely to be far greater as many of the trees have not yet been individually recorded. In addition to this, the council owns and manages approximately 40 hectares of broadleaved woodland, for which Ash is a major component.

Ash dieback is expected to have a devastating impact on Exeter's Ash trees and it is likely to result in the loss of the majority of the city's Ash tree population. The disease is already having a major impact on trees in the surrounding countryside. The loss of Ash trees will have significant impact on the cityscape and ecosystem services. Removing infected trees and replanting with alternative species, will also have a substantial financial cost, which will put further pressure on already strained budgets.

There is however, some hope and experience, from our European neighbours, showing that approximately 5% of Ash trees are genetically tolerant to the disease. Research indicates that these genetic traits can be inherited and therefore it is important that we retain as many healthy Ash trees



as possible. This will go some way to mitigate the effects of the disease and ensure that there is a seed source for future generations, of genetically tolerant ash trees. Dead and dying trees can also continue to perform some of their ecosystem functions and it is therefore important that we retain trees where they do not pose a significant threat to the public.

*“Natural regeneration will encourage the process of natural selection for tolerance, so healthy trees should be maintained for as long as possible to ensure regeneration from tolerant mother trees.”* (Defra – June 2019)

In response to the impacts of the disease and the scale of the problem, Exeter City Council has put in place an Ash Dieback Action Plan (see appendix xxx for a summary). The Action Plan was developed using the Ash Dieback Action Plan Toolkit, a guidance document produced by the Tree Council <https://www.treecouncil.org.uk/What-We-Do/Ash-Dieback>

The Action Plan accords with the overall Tree and Woodland Strategy, but specifically focuses on the challenges presented by Ash dieback. The Action Plan addresses both the short term risk implications, as well as the longer term impacts on the landscape, ecosystem services and the wider environment.

The council is working in line with local plans and national objectives and is a member of the Devon Ash Dieback Resilience Forum. DADRF is convened by Devon County Council and members of the forum include Local Authorities, private estates, conservation Charities and industry bodies.

*“The Devon Ash Dieback Resilience Forum is working collaboratively to raise awareness, provide advice, and manage the risks posed by the disease and spearhead measures to mitigate its environmental consequences. The Forum has published freely available Guidance Notes, and the full set is available on the Devon Local Nature Partnership website”* (Devon County Council, 2019).

There are currently no commercially available treatments for Ash dieback. Because of the airborne nature of the disease and its presence in the wider environment, the current understanding is that sanitation felling is not an effective means of controlling its spread. At present only those trees that pose a significant threat to public safety, will be subject to remedial action.

In an attempt to mitigate the effects of the disease, the council will seek to retain those trees that do not pose a significant threat, promote natural regeneration (where it is appropriate to do so) and increase tree planting numbers, using a diversity of species and genotypes.

### **Dutch elm disease**

Dutch elm disease (*Ophiostoma ulmi*) is now known to have been in the United Kingdom since the 1920s. During the 1960s and 1970s, a much more aggressive strain of the fungus *Ophiostoma novo-ulmi* emerged. The more aggressive strain of the disease, has had a devastating impact on the UKs elm population (*Ulmus* spp. and the closely related *Zelkova* spp.). By the time *Ophiostoma novo-ulmi* had become established in the 1970s, millions of elm trees had been killed by the disease.

Dutch elm disease is now present throughout the UK and continues to pose a problem, preventing the majority of the native elm population getting past the juvenile stage (15-20 years). Dutch elm disease is carried by Elm bark Beetles, mainly in the genus *Scolytus*, which acts as a vector for the spread of the fungus. The disease is also known to have the ability to spread via root contact from infected to healthy trees.

Dutch elm disease effects the trees vascular system, ultimately killing its host. However, the underground component often persists. English elm (*Ulmus procera*), is one of the most common elm species in Devon and it has a suckering habit. The characteristic suckering of the English elm, means that infected trees often asexually reproduce, resulting in dense groups of young trees that are all genetically identical and are highly susceptible to reinfection.

Reinfection usually occurs within the first 10-20 years of regrowth and the cycle of regeneration, infection and dieback continues. Once infected, trees can die within one or two growing seasons.

Attempts to control the spread of DED in the UK, have mostly been abandoned, because the disease is now well established in the wider environment and control measures are largely ineffective.

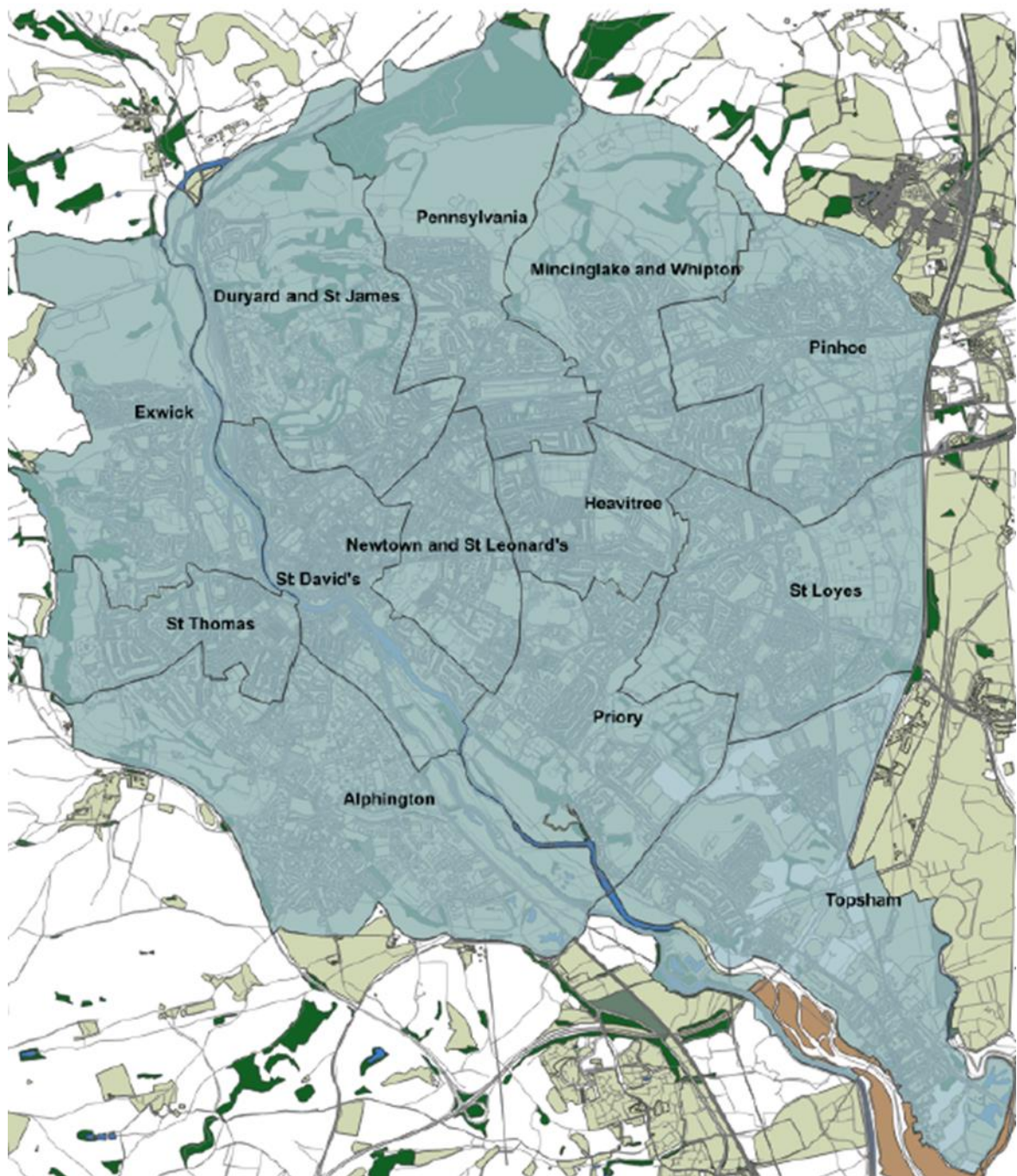
Breeding programs have led to the production of disease resistant cultivars, but these trees are not likely to offer a like for like equivalent replacement for our native elm species.

The cyclical and ongoing nature of the disease usually necessitates continued management, particularly where the infected trees pose a threat to people and property. Along with a program of dead elm removal, the council will continue to plant trees on an annual basis and aim to increase species diversity to offset the loss.

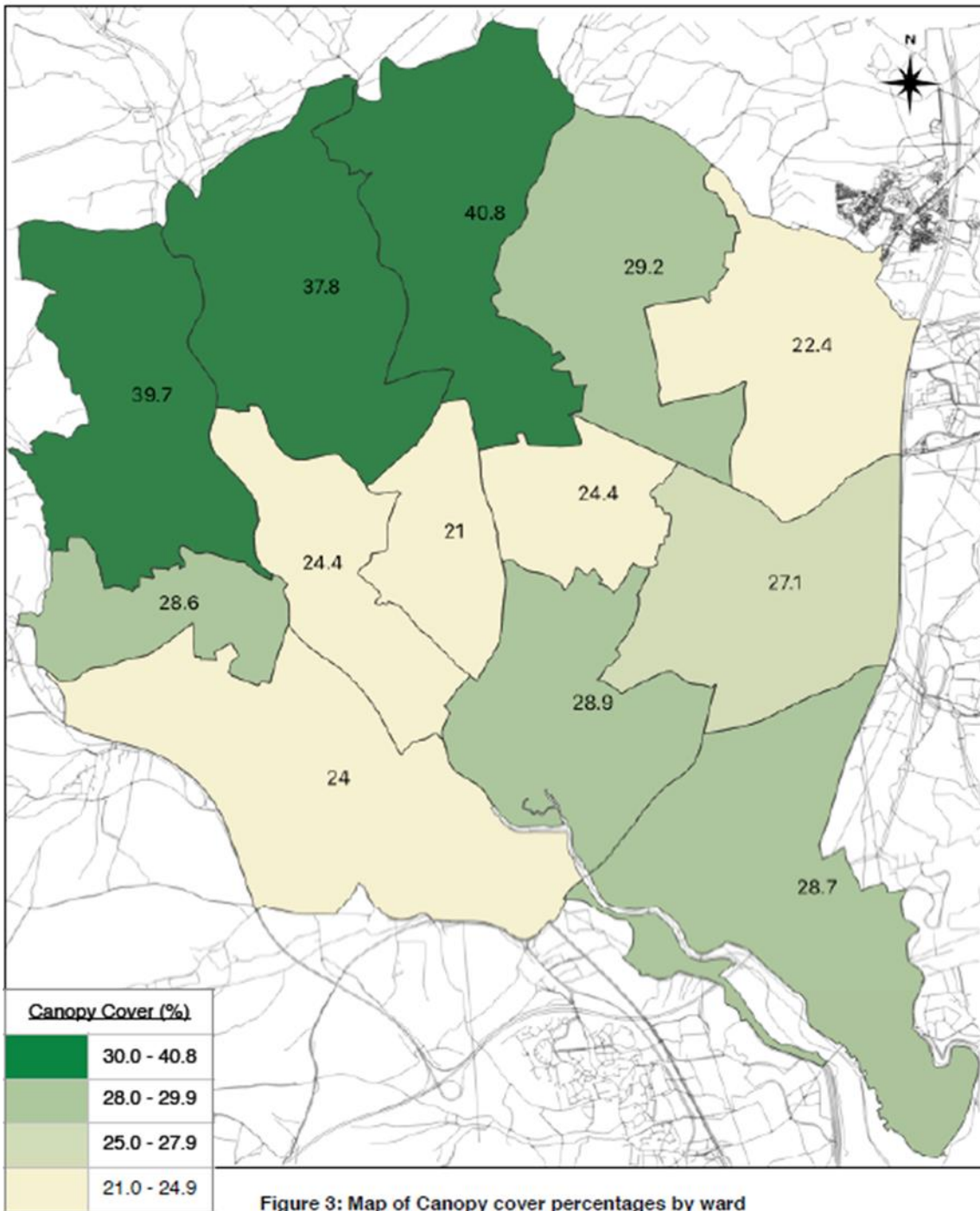
**Devon County Council – Ash dieback, viewed 2019. For more information see the following link <https://www.devon.gov.uk/environment/ash-dieback>**

**Sancus. M, 2019. Arboriculture Association – Ash Dieback Guidance, 2019. Can be found online at <https://www.trees.org.uk/Help-Advice/Public/Ash-Dieback-%E2%80%93-Practice-Guidance>**

**Appendix 4 Treeconomics Map of Exeter 2018**



(Munnery (Treeconomics), 2018)



(Munnery (Treeconomics), 2018)



## **Appendix 5 Defra, 2018. 'A Green Future: Our 25 Year Plan to Improve the Environment'**

The 25 Year Environment Plan aims to deliver cleaner air and water in urban and rural landscapes, protect species and enrich wildlife habitats by implementing approaches that prioritise the environment. It aims to reform the management of agriculture and fisheries, marine and terrestrial environments and nature restoration, tackle waste and soil degradation in rural and urban areas, and tackle the effects of climate change; higher temperatures, rising sea levels, extreme weather and ocean acidification.

The UK Government aims to lead on conservation, climate change, land use, sustainable global food supplies and marine health, champion sustainable development, lead in environmental science, innovate for clean growth and increase resource efficiency, in addition to delivering gold standards in protecting and growing natural capital, using this as a decision-making tool. Using scientific and economical evidence, benefits in all environmental aspects for wellbeing, health and economy will be considered.

Due to Government responsibilities for policies and programmes affecting sectors nationally and internationally, some aspects apply to the UK as a whole. Where responsibility rests with the Northern Ireland Executive and the Scottish and Welsh Governments, the proposals apply to England only.

The UK Government will work with the Devolved Administrations to uphold environmental standards, protect shared natural heritage, and continue to work areas where common frameworks need to be retained. The Plan does not pre-empt these discussions.

The full document is available here: <https://www.gov.uk/government/publications/25-year-environment-plan>

## **Appendix 6 Defra, 2018. The Tree Health Resilience Strategy**

The Tree Health Resilience Strategy aims to protect England's tree population from pest and disease threats. Due to the impossibility of eliminating all threats from occurring, the strategy aims to strengthen protection, minimise impacts and enhance resilience of England's trees.

The strategy tackles threats of pests and diseases by reducing risk of occurrence and strengthening trees to better withstand threats. It focuses on delivering three outcomes to build resilience: (1) Resistance, (2) Response and recovery, (3) Adaptation.

The strategy calls for collective action to build the resilience of UK trees to help them resist, respond, recover, and adapt to pests and diseases. The priority areas include:

- Protecting and valuing trees as important natural capital
- Prioritising biosecurity in all aspects
- Developing and applying the latest science and evidence on threats to inform the risk-based approach
- Applying the environmental goals to the management of England's trees
- Build knowledge and capability to apply the concepts of resilience at all levels

The environmental goals for tree resilience and improving baseline diversity, health and condition include:

- Extent – continued increase of trees
- Connectivity – enhancing the linear forest and matrix of trees within other habitat settings
- Diversity – enhancing genetic diversity and structural diversity of England's treescape
- Condition – encourage healthier trees

The strategy will deliver environmental and behavioural goals through a National Action Plan and is intended to be used by various stakeholders, applicable at all levels to enable others to apply the broad concepts of resilience to the management of trees.

Full document available here: <https://www.gov.uk/government/publications/tree-health-resilience-strategy-2018>

## **Appendix 7 Saving Devon's Treescape - objectives**

### **The project**

People are passionate about trees. Our project will harness this passion by empowering 36,500 people – most of whom will never have undertaken practical conservation action before – to make lasting improvements to their treescapes, providing hope in the face of the alarming changes that ash dieback is already bringing. Ash dieback is everyone's problem; Saving Devon's treescape will encourage everyone to be part of the solution.

**The project will deliver across Devon, with 50% of resources dedicated to action in five priority areas (two urban and three rural). These will be Malborough (South Devon); Torbay; Exeter and Cranbrook new town; Neroche area (Blackdown Hills AONB); and Coly Valleys (East Devon).**

**The project is urgent. Firstly, because ash dieback is happening now, and the pace of its impacts on Devon's treescape is accelerating. Secondly, because (in recognition of the gravity of the coming crisis) we have been offered substantial – but strictly time limited – match funding by Devon County Council for any grant that can be secured.**

### **Objective 1: Awaken interest in TOWs and engage people in their long term care**

- **3 new community tree nurseries will empower local people and generate tree stock for a Free Tree Scheme;**
- **2 hubs will be developed to coordinate sustainable woodfuel supplies;**
- **100 schools will engage in outdoor learning and treescape creation / enhancement in their grounds and neighbourhoods;**
- **Free Tree packs, information and advice will be distributed at 29 shows;**
- **80 community events will inspire people to work for healthy treescapes;**
- **45 TOWs workshops for communities, farmers and landowners will reach 675 people; and**
- **In each of the five priority areas a new volunteer group will be established and supported to plant, tag and nurture new TOWs.**

### **Objective 2: Safeguard the future of TOWs and their wildlife**

- **360 treescapes advisory visits will be made to farmers and landowners;**
- **150km of existing hedges will be enhanced through sustainable management regimes, emphasising important hedgerow trees and treelines.**

### **Objective 3: Establish more trees in the landscape and enhance connectivity**

- **A 3-2-1 ash replacement formula will be championed, with at least three new trees planted (or encouraged) for every large ash lost, two for every medium-sized ash, and one for every small ash;**
- **427 native "Landmark" trees will be planted and nurtured, one for every parish in Devon;**
- **250,000 new urban and rural TOWs will be established, around 50% within the five project priority landscapes;**
- **50 hectares of TOWs will be planted in field corners and copses;**

- **20 km of exemplar “Flagship” hedgerows with standards will be planted in prominent, accessible landscapes, demonstrating best practice to landowners and the wider public;**
- **2,500 hedgerow trees will be established through planting and aftercare;**
- **12,000 hedgerow saplings will be tagged and nurtured to the point where they are no longer vulnerable to hedge trimming; and**
- **4,500 metres of wild ‘fruit routes’ will be established in urban landscapes, including 19,500 TOWs bearing edible fruit for foraging by both humans and wildlife.**



## Appendix 8 ECC tree species

Acacia dealbata  
Acer buergarianum  
Acer campestre  
Acer Campestre Queen Elizabeth  
Acer capillipes  
Acer cappadocicum  
Acer ginnala  
Acer griseum  
Acer lobelii  
Acer negundo  
Acer palmatum  
Acer palmatum 'Atropurpureum'  
Acer palmatum Osakazuki  
Acer platanoides  
Acer platanoides Crimson King  
Acer platanoides 'Drummondii'  
Acer pseudoplatanus  
Acer pseudoplatanus Leopoldii  
Acer pseudoplatanus Purpureum  
Acer pseudoplatanus Variegatum  
Acer rubrum 'Armstrong'  
Acer rufinerve  
Acer saccharinum  
Acer saccharum  
Aesculus flava  
Aesculus hippocastanum  
Aesculus hippocastanum Baumann  
Aesculus x carnea  
Ailanthus altissima  
Alnus cordata  
Alnus glutinosa  
Alnus glutinosa 'Laciniata'  
Alnus incana  
Alnus incana Laciniata  
Amelanchier arborea Robin Hill  
Amelanchier lamarckii Robin H  
Amelanchier sp.  
Araucaria araucana  
Arbutus unedo  
Azara microphylla  
Betula alba  
Betula albosin Septentrionalis  
Betula albosinensis fascinat

Betula ermanii  
Betula grossa  
Betula nigra  
Betula pendula  
Betula pendula 'Dalecarlica'  
Betula pendula 'Fastigiata'  
Betula pendula 'Purpurea'  
Betula pendula 'Tristis'  
Betula pendula Youngii  
Betula pubescens  
Betula utilis  
Betula utilis jacquemontii  
Carpinus betulus  
Carpinus betulus 'Fastigiata'  
Carpinus betulus Frans Fontane  
Castanea sativa  
Catalpa bignonioides  
Catalpa speciosa  
Cedrus atlantica 'Glauca'  
Cedrus brevifolia  
Cedrus deodara  
Cedrus libani  
Cercidiphyllum japonicum  
Cercis canadensis  
Cercis siliquastrum  
Chamaecyparis Erecta Viridis  
Chamaecyparis lawsoniana  
Chamaecyparis lawsoniana Lutea  
Chamaecyparis nootkatensis  
Chamaecyparis pisifera Plumosa  
Chamaecyparis pisifera Sq  
Chamaecyparis spp.  
Cornus controversa  
Cornus mas  
Corylus avellana  
Corylus colurna  
Cotoneaster frigidus  
Cotoneaster simonsii  
Cotoneaster x watereri  
Crataegus crus-gallii  
Crataegus laevigata Pauls S  
Crataegus monogyna  
Crataegus monogyna 'Stricta'  
Crataegus prunifolia  
Crataegus x lavalleyi  
Cryptomeria japonica

Cupressus × leylandii  
Cupressus arizonica  
Cupressus cashmeriana  
Cupressus macrocarpa  
Davidia involucrata  
Eucalyptus gunii  
Euonymus latifolius  
Fagus sylvatica  
Fagus sylvatica Aspleniifolia  
Fagus sylvatica 'Dawyck'  
Fagus sylvatica Dawyck Gold  
Fagus sylvatica 'Pendula'  
Fagus sylvatica 'Purpurea'  
Fagus sylvatica Rohanii  
Ficus carica  
Fraxinus americana  
Fraxinus angustifolia  
Fraxinus excelsior  
Fraxinus excelsior Diversifoli  
Fraxinus excelsior Jaspidea  
Fraxinus excelsior Pendula  
Fraxinus ornus  
Fraxinus oxycarpa  
Fraxinus oxycarpa Raywood  
Fraxinus pennsylvanica  
Ginkgo biloba  
Gleditsia triacanthos  
Gleditsia triacanthos Sunburst  
Hamamelis intermedia  
Hamamelis intermedia 'Harry'  
Ilex aquifolium  
Ilex aquifolium Aureomarginata  
Ilex aquifolium variegatum  
Ilex x altaclerensis  
Juglans nigra  
Juglans regia  
Juniperus communis  
Juniperus communis Compressa  
Juniperus phoenicea  
Koelreuteria paniculata  
Laburnum anagyroides  
Laburnum x watereri 'Vossii'  
Lagerstroemia  
Larix decidua  
Larix kaempferi  
Laurus nobilis

Ligustrum lucidum  
Ligustrum lucidum Exc superbum  
Liquidamber styraciflua  
Liriodendron tulipifera  
Magnolia Galaxy  
Magnolia grandiflora  
Magnolia Kobus  
Magnolia stellata  
Magnolia x Brooklynensis  
Magnolia x soulangeana  
Magnolia 'Yellow Bird'  
Malus baccata  
Malus Cox's Orange Pippin  
Malus domestica  
Malus 'Eleyi'  
Malus floribunda  
Malus Jonagold  
Malus 'Rudolph'  
Malus sylvestris  
Malus tschonoskii  
Malus x purpurea  
Mespilus germanica  
Metasequoia glyptostroboides  
Morus alba  
Morus nigra  
Nothofagus obliqua  
Nyssa sylvatica  
Ostrya carpinifolia  
Parrotia persica  
Parrotia persica Vanessa  
Paulownia tomentosa  
Phillyrea latifolia  
Picea abies  
Pinus mugo  
Pinus nigra  
Pinus nigra austriaca  
Pinus radiata  
Pinus strobus  
Pinus sylvestris  
Pinus wallichiana  
Pittosporum bicolor  
Pittosporum tenuifolium  
Platanus orientalis  
Platanus x hispanica  
Populus alba  
Populus nigra

Populus nigra betulifolia  
Populus nigra 'Italica'  
Populus tremula  
Populus trichocarpa  
Populus x canadensis  
Prunus - Pink Perfection  
Prunus 'Accolade'  
Prunus Amanogawa  
Prunus avium  
Prunus avium Plena  
Prunus cerasifera  
Prunus cerasifera 'Pissardii'  
Prunus domestica  
Prunus Kanzan  
Prunus laurocerasus  
Prunus lusitanica  
Prunus maackii 'Amber Beauty'  
Prunus padus  
Prunus padus Watereri  
Prunus sato-zakura  
Prunus sato-zakura 'Kanzan'  
Prunus serrula  
Prunus serrula 'Tibetica'  
Prunus serrulata  
Prunus Shirofugen  
Prunus Shirotae  
Prunus spinosa  
Prunus 'Sunset Boulevard'  
Prunus Tai-haku  
Prunus x hillieri 'Spire'  
Prunus x yedoensis  
Pseudotsuga menziesii  
Pterocarya fraxinifolia  
Pyrus calleryana 'Chanticleer'  
Pyrus communis  
Pyrus salicifolia Pendula  
Quercus cerris  
Quercus frainetto  
Quercus ilex  
Quercus palustris  
Quercus petraea  
Quercus pubescens  
Quercus robur  
Quercus robur 'Fastigiata'  
Quercus rubra  
Quercus x hispanica Lucombeana

Rhus typhina  
Robinia pseudoacacia  
Robinia pseudoacacia 'Frisia'  
Salix alba  
Salix babylonica 'Tortuosa'  
Salix caprea  
Salix daphnoides  
Salix fragilis  
Salix x sepulcralis chrysocoma  
Sambucus nigra  
Sequoia sempervirens  
Sequoiadendron giganteum  
Sophora japonica  
Sorbus americana  
Sorbus aria  
Sorbus aucuparia  
Sorbus aucuparia Aspleniifolia  
Sorbus aucuparia Sheerwater S  
Sorbus aucuparia 'Streetwise'  
Sorbus cashmiriana  
Sorbus intermedia  
Syringa vulgaris  
Taxodium distichum  
Taxus baccata  
Taxus baccata 'Fastigiata'  
Thuja plicata  
Thuja plicata 'Zebrina'  
Thujopsis dolabrata Aurea  
Tilia americana  
Tilia cordata  
Tilia cordata 'Greenspire'  
Tilia oliveri  
Tilia platyphyllos  
Tilia platyphyllos 'Aurea'  
Tilia platyphyllos 'Rubra'  
Tilia tomentosa 'Brabant'  
Tilia tomentosa 'Petiolaris'  
Tilia x euchlora  
Tilia x europaea 'Pallida'  
Tilia x europea  
Trachycarpus fortunei  
Ulmus glabra  
Ulmus glabra 'Exoniensis'  
Ulmus lobel  
Ulmus procera  
X Cupressocyparis leylandii

Zelkova serrata  
Zelkova serrata 'Green Vase'

## Appendix 9 Most common individually identified trees on ECC land

The table below lists the most common individually identified trees on ECC land. Taking into account woodlands, Quercus, Fraxinus and Acer will be the most populous species

SPECIES	OCCURANCES	%
Betula pendula	361	4%
Fraxinus excelsior	340	4%
Acer platanoides	338	4%
Acer pseudoplatanus	332	4%
Quercus robur	326	4%
Tilia sp.	286	3%
Sorbus aucuparia	254	3%
Chamaecyparis lawsoniana	234	3%
Prunus sp.	195	2%
Tilia x europea	175	2%
Carpinus betulus	139	2%
Fagus sylvatica	138	2%
Ilex aquifolium	138	2%
Crataegus monogyna	129	2%
Pinus sylvestris	122	1%
Prunus avium	117	1%
Aesculus hippocastanum	108	1%
Acer campestre	102	1%
Taxus baccata	99	1%
Tilia cordata	90	1%
Platanus x hispanica	87	1%
Betula sp.	82	1%
Betula pubescens	80	1%
Alnus glutinosa	75	1%
Malus sp.	75	1%
Quercus ilex	71	1%
Taxus baccata 'Fastigiata'	69	1%
Thuja plicata	65	1%
Quercus rubra	61	1%
Betula pendula 'Tristis'	60	1%
Betula utilis jacquemontii	60	1%
Sorbus aria	60	1%
Alnus sp.	57	1%
Acer pseudoplatanus 'Leopoldii'	55	1%
Liquidamber styraciflua	55	1%
Fagus sylvatica 'Purpurea'	51	1%
Acer saccharinum	50	1%
Fraxinus ornus	49	1%
Fraxinus angustifolia	46	1%
Pinus nigra	45	1%



Prunus padus	45	1%
Robinia pseudoacacia	45	1%
Tilia platyphyllos	43	1%

In order of occurrence frequency within our woodlands;

Frequency	Species
10 of 11 woodlands.	Oak, Ash.
8 of 11 woodlands	Field Maple, Hazel.
6 of 11 woodlands	Cherry, Sycamore.
5 of 11 woodlands	Norway maple, Hawthorn.
3 of 11 woodlands	Lime, Blackthorn, Hornbeam, Willow.
2 of 11 woodlands	Alder, Poplar, Elder, Birch
1 of 11 woodlands	Beech, Chestnut, Rowan, Spindle, Scots pine, Box elder, Yew, Elm, Sweet chestnut

## Appendix 10 Veteran Trees

site_code	plot_number	site_name	feature_location	Age Class	Height (m)	Spread (m)	DBH (cms)	Size class.
66605053	60078	St Bartholomew's Cemetery	Acer pseudoplatanus	V	8	4	250	1
14201459	60006	Westcombe	Castanea sativa	V	16	20	300	10
66601009	60008	St David's Church	Cedrus brevifolia	V	20	22	275	12
66614010	60007	St Margaret's Church	Fagus sylvatica	V	15	15	180	4
66605051	60116	Rougemont Gardens	Morus nigra	V	9	9	75	1
14201988	60011	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60022	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60057	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60066	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60092	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60111	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60139	Belmont Park	Platanus x hispanica	V	20	9	82	1
14201988	60034	Belmont Park	Platanus x hispanica	V	22	18	200	8
66605060	60014	Southernhay Green	Platanus x hispanica	V	24	20	250	12
66617017	60053	St Thomas Church	Quercus cerris	V	22	20	175	8
66605051	60036	Rougemont Gardens	Quercus ilex	V	15	20	200	6
66605060	60010	Southernhay Green	Quercus ilex	V	18	20	180	6
66601001	60068	Bury Meadow	Quercus palustris	V	22	18	110	4
66601001	60058	Bury Meadow	Quercus palustris	V	24	16	180	7
66607003	60177	Heavitree Pleasure Ground	Quercus robur	V	8	4	120	0
66615011	60005	Burrator Drive Play Area	Quercus robur	V	12	10	90	1
66607003	60053	Heavitree Pleasure Ground	Quercus robur	V	12	9	120	1
66615011	60004	Burrator Drive Play Area	Quercus robur	V	15	10	100	2
14201227	60026	Lakeside Avenue	Quercus robur	V	15	12	100	2
66615011	60003	Burrator Drive Play Area	Quercus robur	V	15	15	125	3
66618021	60076	Cowick Barton Playing Field	Quercus robur	V	15	12	180	3
66618021	60025	Cowick Barton Playing Field	Quercus robur	V	9	22	175	3
14201227	60014	Lakeside Avenue	Quercus robur	V	20	15	150	5
66613005	60041	King George V Playing Field	Quercus robur	V	18	14	180	5
66607003	60118	Heavitree Pleasure Ground	Quercus robur	V	12	16	250	5
66607003	60237	Heavitree Pleasure Ground	Quercus robur	V	22	14	160	5

site_code	plot_number	site_name	feature_location	Age Class	Height (m)	Spread (m)	DBH (cms)	Size class.
66618021	60081	Cowick Barton Playing Field	Quercus robur	V	22	15	150	5
66613005	60034	King George V Playing Field	Quercus robur	V	18	16	175	5
66613005	60058	King George V Playing Field	Quercus robur	V	18	17	175	5
66613005	60074	King George V Playing Field	Quercus robur	V	20	14	200	6
66607003	60191	Heavitree Pleasure Ground	Quercus robur	V	22	17	180	7
66613005	60040	King George V Playing Field	Quercus robur	V	23	16	200	7
66613005	60073	King George V Playing Field	Quercus robur	V	24	18	175	8
66613005	60056	King George V Playing Field	Quercus robur	V	22	14	250	8
66613005	60045	King George V Playing Field	Quercus robur	V	22	20	175	8
14201459	60008	Westcombe	Quercus robur	V	24	18	180	8
66613005	60046	King George V Playing Field	Quercus robur	V	22	16	250	9
66613005	60075	King George V Playing Field	Quercus robur	V	20	25	250	13
66601009	60001	St David's Church	Quercus x hispanica Lucombeana	V	9	7	120	1
66607003	60077	Heavitree Pleasure Ground	Robinia pseudoacacia	V	9	10	120	1
66618050	60001	Pinces Gardens Allotments	Sequoiadendron giganteum	V	24	9	250	5
66618050	60000	Pinces Gardens Allotments	Sequoiadendron giganteum	V	23	9	300	6
66607002	60012	The Church of St Michael and All Angels	Taxus baccata - 'Notable Tree' designation	V	9	12	125	1

## Appendix 12 ECC Woodlands

<b>Location</b>	<b>Class</b>	<b>Area m2</b>
Alphington Woodland	Woodland	28,844
Chantry Meadow	Woodland	4,661
Horseguards	Woodland	1,430
Farm Hill	Woodland	1,306
Farm Hill	Woodland	1,190
Farm Hill	Woodland	1,306
Guys Road Woodland	Woodland	2,370
Savoy Hill Woodland	Woodland	9,578
Savoy Hill Woodland	Woodland	4,340
Brookway	Woodland	2,103
Rosebarn Lane	Woodland	1,449
Eastern Field	Woodland	91,303
Land adjacent to the River Exe	Woodland	7,185
Land at Bonhay Road, St. Davids	Woodland	2,762

## **Appendix 13 Classifying our woodlands.**

All our woodlands are secondary woodlands (post c1600) no ancient woodland exists, however there are a few veteran trees that are within or close by to our woodlands which do predate 1600.

All our woodlands fit into the following categories:

### Amenity Plantation

Mulberry Close

Topsham Millennium Woods

Exwick Cemetery

Pinwood Meadow

Vaughan Road

Well Oak Park

### Individual copses

Whitycombe Way

Higher Barley Mount

Mayflower Avenue

Redhills Copses

Farm Hill

Gloucester Road

### Infill Copse

Fairpark Car Park

Rosebarn Lane-Stoke Hill

Holman Way Car Park

Kinnerton Estate

Guys Road

Orchards (FLOW are the ribbon orchards planted along the River Exe)

Bromhams Farm Community

Topsham Community Orchard  
Eastern Fields  
Devonshire Place Community  
Cowick Barton Playing Field  
Exwick Mill Field (FLOW)  
Exwick Station Rd to Health Centre (FLOW)  
Exwick Playing Filed (FLOW)  
Flowerpot Playing Field ( FLOW)  
Bonhay Meadow/Exe Bridges/The Malt House (FLOW)  
Trews Weir canal side (FLOW)  
Double Locks Fruit Wall (FLOW)

Park Woodland

Monkerton Open Space  
West Garth Road  
Topsham Recreation Ground  
Lancelot Road  
Great Hill View  
Chantry Meadow  
Duckes Marsh  
Eastern Fields  
Grace Road

Plantation for Screening

Alphington Strip Woodland  
King William Street Carpark  
Rollestone Crescent  
Horseguards  
Pynes Hill  
Bad Homburg Plantation

Dawlish Road

Heavitree Gallows

Hill Barton Road

Roadside individual trees in a group/hedgerow

Hill Barton Lane

Pendragon Road

Semi Natural woodland

Cemetery Field

Savoy Hill

Widecombe Way

Waterway bank

Brookway strip copse

Bonhay Road

Georges Copse

Hamlin Lane PF

Wood pasture

Ludwell Valley Park

Appendix 15 Action Points

Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
✓		✓	Section 2 The Tree and Woodland Resource  Section 4 Tree establishment	Action 01	Increase tree canopy through tree planting, natural regeneration and caring for existing trees with particular focus on wards where canopy cover is identified as low.
✓			Section 2 The Tree and Woodland Resource  Section 4 Tree establishment	Action 02:	We will aim to increase our canopy cover from 24% to 30% within the next 20 years.
✓	✓		Section 2 The Tree and Woodland Resource  Section 4 Tree establishment	Action 03:	Promote the planting of trees on private land. We will do this by sharing information about the importance of urban trees as well as offering tree planting advice and promoting and supporting initiatives that offer free or subsidised tree planting schemes.
✓		✓	Section 6 Tree management	Action 04:	Phased tree planting and removal to ensure that there is good representation of all age classes at both a local and city level.



Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
			on council land Section 4 Tree establishment		
✓		✓	Section 4 Tree establishment	Action 05:	Undertake tree planting and removal with a focus on creating a diverse mixture of species and genotypes.
✓		✓	Section 2 Tree and woodland resource  Section 4 Tree establishment	Action 06:	Source and select trees for planting that are well suited to the local site conditions, alongside the phased removal of trees that are not suitable or have become problematic as a result.
✓	✓	✓	Section 4 Tree establishment	Action 07:	Tree planting proposals will have to provide proof of adequate consideration for the tree's position in the landscape and the potential for any negative impacts (establishment through to maturity).
✓		✓	Section 2. The Tree and Woodland Resource	Action 08:	The council will continue to update its tree and woodland inventory in order to maintain a comprehensive understanding of its tree and woodland resource.
✓		✓	Section 2. The Tree and Woodland Resource	Action 09:	The council will take part in the i-Tree Eco survey in order to gain a better understanding of the tree stock, canopy cover and ecosystem services for both publicly and privately owned trees across the city.

Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
✓		✓	Section 6. Tree management on Council Land	Action 10:	We will risk assess trees using a recognised methodology (QTRA), set appropriate re-inspection intervals and keep records on the council's tree database (Confirm) in accordance with the council's Tree Risk Management Strategy.
✓		✓	Section 3 Wildlife and Biodiversity	Action 11:	We will seek advice from, and work in collaboration with, local ecologists and nature conservancy charities such as Devon Wildlife Trust in order to gain a better understanding of the council's green infrastructure, and the special management that is required in order to protect and enhance the wildlife that they support.
✓	✓		Section 4 Tree establishment	Action 12:	We will work in collaboration with council departments and local organisations that have an interest in the city's urban forest.
	✓	✓	Section 2. The Tree and Woodland Resource	Action 13:	We will encourage community involvement and provide volunteering opportunity's allowing people to make a positive contribution to their surrounding area and help advance urban forest goals.
	✓		Section 2. The Tree and Woodland Resource	Action 14:	The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.
✓	✓		Section 4 Tree establishment	Action 15:	We will continue to work with other local authorities and non-government organisations across the city and countywide to ensure that there is widespread collaboration in reaching local and regional goals.
	✓	✓	Section 6. Tree management on Council Land	Action 16:	We will engage with utility companies to ensure that their operations do not have a negative impact on council trees. The council will provide channels for residents and communities to report damage or trees at risk from damage by others.

Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
	✓	✓	<b>Section 2. The Tree and Woodland Resource.</b>	<b>Action 17:</b>	We will attempt to improve access to woodlands with particular emphasis on areas where public access opportunities have not been fully realised.
		✓	<b>Section 6. Tree management on Council Land</b>	<b>Action 18:</b>	The council will develop a woodland management plan to ensure that council woodlands are managed in a planned and sustainable manner that accords with the UK Forestry Standard.
✓		✓	<b>Section 6. Tree management on Council Land</b>	<b>Action 19:</b>	The council will seek to take advantage of any available financial aid and grants for tree and woodland establishment and management.
		✓	<b>Section 6. Tree management on Council Land</b>	<b>Action 20:</b>	We will manage ECC's trees and woodlands in accordance with the latest industry best standards and practices. Continued monitoring and auditing of the arboriculture contractors works to ensure that it completed to the highest standard.
✓		✓	<b>Section 4 Tree establishment</b>	<b>Action 21:</b>	We will work towards creating a tree establishment plan that is influenced by canopy cover assessment, species and age diversity in order to meet canopy cover objectives.
✓		✓	<b>Section 4 Tree establishment</b>	<b>Action 22:</b>	We will ensure that newly planted trees have sufficient growing space and suitable growing conditions so that they can reach their genetic potential and thus maximise the benefits that they provide.
✓		✓	<b>Section 5. Planning and Development</b>	<b>Action 23:</b>	There will be a presumption against the cutting down or pruning of a protected tree. Where permission is granted the Council will seek impose conditions requiring that a replacement trees is planted

Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
		✓	Section 6. Tree management on Council Land	Action 24:	The council will seek to prosecute anyone who illegally damages or destroys public trees.
✓		✓	Section 5. Planning and Development	Action 25:	Trees that could be impacted by a new development will be assessed and evaluated by an arboriculture's with reference to British Standard BS5837: <i>Trees in relation to design, demolition and construction – recommendation</i> as part of an informed decision making process.
		✓	Section 6. Tree management on Council Land	Action 26:	The council will manage its trees in accordance with industry standards and best practice to ensure that council trees are in good physiological and structural condition in order to promote longevity and maximise ecosystem services.
✓	✓	✓	Section 3 Wildlife and Biodiversity	Action 27:	We will improve the ecological value of our woodlands by developing a woodland management plan that is focused on sustainability and ecological integrity whilst facilitating appropriate public access.
		✓	Section 6. Tree management on Council Land	Action 28:	The council will manage tree risk in accordance with its Tree Risk Management Strategy following the latest industry guidance (NTSG) and using a well-recognised and accepted risk assessment methodology.
	✓		Section 4 Tree establishment	Action 29:	The council will aim to improve people's understanding of the importance of urban trees through a range of information channels.
		✓	Section 2.	Action 30	The council will seek to recycle and utilise all arising from tree works operations.

Trees and woodlands	Community	Resource Management	GROUP	REF	Action Point
			The Tree and Woodland Resource		
✓		✓	Section 3. Biosecurity	Action 31:	All planting stock must be procured from trusted nurseries that adhere to the highest biosecurity practices (quarantine and isolation) and have a plant passport or phytosanitary certificate as required.
✓		✓	Section3. Biosecurity	Action 32:	Staff, partner organisations and contractors will be expected to follow the highest biosecurity practices and stay up to date with the latest government advice and recommendations.



**Equality Impact Assessment** - To be completed using the checklist of questions at the end of the table

**Title of work being assessed:** Tree and Woodland Strategy

**Introduction**

This strategy is designed to ensure equitable and proportionate play space provision across the city, but with a localised focus on LSOA areas.

The strategy content provides a full background and context

**Lead officer:** Paul Faulkner

**Service Manager:** Lou Harvey

**Stakeholders:** Residents, employees of the council and visitors to the city.

**Revision:** 11/3/2020

For each of the areas below, an assessment has been made on whether the policy has a **positive, negative or neutral impact**, and brief details of why this decision was made and notes of any mitigation are included. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** –some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the council has very little discretion

	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>
<b>Target group / area</b>			
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers asylum seekers etc.)		Broad environmental improvements for all sections of the community	No identified issues.
<b>Disability</b>		Some access improvements to wooded areas	There may be some locations where no meaningful

	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>
(as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)			alterations can be made to improve accessibility and use, e.g. due to topography
<b>Sex/Gender</b>			No identified issues.
<b>Gender reassignment</b>	No identified issues		
<b>Religion and belief</b>	No identified issues.		
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual)	No identified issues		
<b>Age</b> (children and young people aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older people 81+. The age categories are for illustration only as overriding consideration should be given to		Broad environmental improvements for all sections of the community	



	Neutral	Positive	Negative
needs).			
<b>Community relations</b>	No identified issues	Potential for community based activities and ongoing direct involvement	
<b>Human Rights</b>	No identified issues		
<b>Actions identified as a result of the impact assessment</b>			
<b>Action</b>	Lead	By when	
Dynamic assessment of impacts of initiatives arising from the Tree and Woodland Strategy np ensure no unintended adverse consequences	Lou Harvey	Ongoing	

<b>Equality Impact Assessment Report Questions checklist</b>	
<b>1.</b>	<p>Describe the piece of work you are assessing and the reason it is being carried out. Are you:</p> <ul style="list-style-type: none"> <li>○ Making a strategic budget proposal</li> <li>○ Developing a new policy, strategy or project</li> <li>○ Reviewing and revising a policy, strategy or project</li> <li>○ Reviewing a function or a service</li> <li>○ Restructuring a service.</li> </ul> <p>Include any options appraisal and if you have a preferred option explain why.</p>

2.	What are the timescales for completing the work? What committee deadlines do you have to meet?
3.	What are the aims and objectives of the work? How do these link to wider council or strategic objectives.
4.	Who will be the main beneficiaries of the piece of work and in what way? All people in Exeter? Council staff? A specific stakeholder group? A combination of these?
5.	What data do you have on how different groups would be affected by the work?
6.	What research studies or reports have been carried out in other areas of the country or nationally that provide information about the likely impact of your work on equality groups?
7.	What consultation has taken place or is planned with customers (individuals and groups) from equality groups?
8.	What does the consultation indicate about any differential positive or negative impact(s) of this piece of work?
9.	If there are gaps in your previous or planned consultation and research are there any experts/relevant groups that can be contacted to get further views or evidence on the issues? If so please explain who they are and how you will obtain their views.
10.	If you have indicated there is a negative impact on any group, is that impact Legal; Intended; of high or low impact?
11.	If you identified any negative impact that is of low significance, can you minimise or remove it? If so how?
12.	Could you improve the strategy/policy/project's positive impact and if so how?
13.	How do you intend to continue monitoring the impact of this strategy/policy/project?
14.	If there are gaps in your evidence base, do you need to carry out any further research about the likely impact of your work on equality groups?
	<b>There might be a time delay here as you will need to get the results of your consultation before you can continue working your way through the questions.</b>

<b>15.</b>	As a result of this assessment and available evidence collected, including consultation, what if any changes do you need to make to the strategy/policy/project?
<b>16.</b>	Will the changes planned ensure that the negative impact is: Legal; Intended; of low impact?
<b>17.</b>	What monitoring/evaluation/review process have you set up to check the successful implementation of the strategy/policy/project?
<b>18.</b>	How will this monitoring/evaluation further assess the impact on the equality groups/ensure the strategy/policy/project is non-discriminatory?
<b>19.</b>	Please provide an action plan showing any recommendations that have arisen from the assessment and how you plan to take them forward. Are your actions SMART (specific, measurable, achievable, relevant and time-based).
<b>20.</b>	When will you next review this work and the impact assessment?

## Appendix 17 References

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