

AMENDMENTS TO TREE MANAGEMENT POLICY 2015-2020 'LIVING WITH TREES' FOLLOWING INTERIM INTERNAL REVIEW IN FEBRUARY 2019

The Council's Tree Management Policy 2015-2020 'Living With Trees' was adopted at a meeting of the Council on July 13, 2015.

An interim internal review of the policy commenced during 2018 in accordance with the relevant specific action listed in the Action Plan which accompanies and supports the Tree Management Policy. This interim internal review sought to reassess and update aspects of the policy to provide further direction and clarity for management of trees in the county.

The recommendations of the review were agreed by the Environment, Water & Climate Change Strategic Policy Committee (SPC) at a meeting on February 5, 2019. The updated policies are being implemented for the remaining duration of the Tree Management Policy 2015-2020.

The updates and amendments to the Tree Management Policy 2015-2020 'Living With Trees' are as follows:

ADDENDUMS

Addendum to policy statement 1.3 Impact of Climate Change and Trees (Agreed February 2019)

The 'Dublin Tree Canopy Study' undertaken by the School of Geography, University College Dublin and published in March 2017 provides an analysis of data from an aerial survey of the tree cover for the Greater Dublin Region within the lands managed by the four Dublin local authorities and the Office of Public Works. The survey data is analysed in terms of the environmental services (biodiversity, air quality, water management) provided by the tree cover across the county.

The report indicates that "A tree canopy cover of 15% would make Dublin comparable to other European cities. Currently cover across the county is 10% but there are large variations between local authorities."

In regard to the South Dublin Administrative Area the report finds "South Dublin County Council (SDCC) displays a strong urban/rural divide in terms of canopy cover. Rural areas contain approximately double the canopy cover per unit area compared to its urban areas, due in part to the presence of forested areas in the south Dublin Mountains and areas adjacent to the river Liffey. SDCC's urban areas are impoverished in terms of tree canopy compared to neighbouring DLR, with approximately two thirds of urban SDCC having less than 10% canopy cover. As with Fingal, most urban areas of SDCC would benefit from increased plantings, though in contrast to Fingal SDCC has a relative abundance of rural canopy. Areas of particular need of tree planting are Adamstown, City West, Firhouse, Jobstown, Tallaght, Palmerstown, Perrystown and Walkinstown."

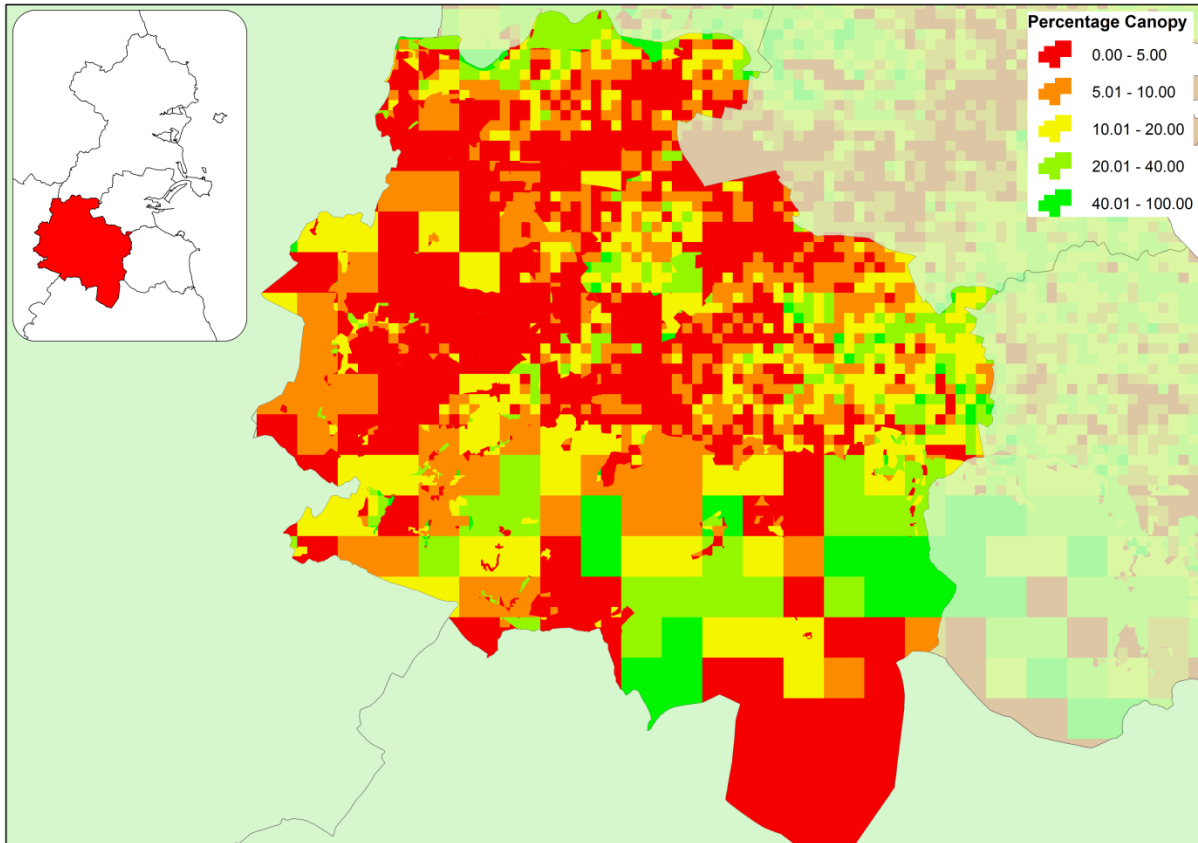


Figure 4. Estimated tree canopy cover across SDCC, which is 42% urbanised. (Brennan, M., Mills, G, and Ningal, T. 2017: The Dublin Tree Canopy Study. University College Dublin.)

South Dublin County Council's Climate Change Action Plan promotes the use of trees and vegetation as adaptive measures to manage air pollution, drainage and flood mitigation etc. Actions aim to develop, agree and embed principles of sustainable and best practice tree planting and management in South Dublin. The residents of South Dublin are also encouraged to support the Council's actions to increase tree canopy cover by planting trees in private gardens.

Amended Policy Statements:

4.3.4 Removal of Trees (Amended February 2019)

Trees are removed only when necessary as a last resort. The criteria for tree removal are:

- **Where a tree is located in close proximity to a public lighting column and** the long term viability of the tree if retained in its location would be compromised by a requirement for ongoing maintenance in order to maintain the effectiveness of the adjoining street light.

4.4 Unauthorised Pruning, Removal or Damage to Council Owned Trees (Amended February 2019)

Policy: The Council may seek to prosecute anyone found to be carrying out unauthorised work or causing damage to its trees without permission and where appropriate apply the maximum penalty.

The unauthorised removal of trees affects the amenity of an area and destroys the many positive benefits of trees in a locality.

All Council staff operate from vehicles displaying the Council's logo and tree contractors operating on behalf of the Council are required to erect signage which refers specifically to South Dublin County Council. If a person is observed pruning, removing or causing damage to a Council owned tree and it is suspected that the action is being carried out without the Council's consent, the matter must be reported by the observer to An Garda Síochána in the first instance and the Council notified. Unauthorised damage, pruning or removal of a Council owned/managed tree may be prosecuted by An Garda Síochána under the Criminal Damage Act 1991.

Unauthorised works or damage to Council-owned trees may result in a charge being levied. This charge will reflect the amount of damage sustained and where the life/safety of the trees is undermined, it will include the cost of total tree replacement and compensation for loss of tree value. These charges will be drawn up by professional parks staff and each case will be assessed on an individual basis using a recognised tree valuation system (eg. CAVAT or Helliwell)

6.1 Obstruction of Street Light (Amended February 2019)

Policy: The Council will undertake work to a tree in Council ownership/management to ensure that trees do not unduly obstruct the streetlight.

Tree pruning will be undertaken where reasonably feasible to address obstruction of a street light. In circumstances where the long term viability of the tree if retained in its location would be compromised by a requirement for ongoing maintenance in order to maintain the effectiveness of the adjoining street light, the tree may be removed. Alternative public lighting solutions should also be explored for areas of existing mature and established trees. Where a tree is removed from a roadside verge, due to proximity to a public lighting column, a replacement tree will not normally be planted back into the same verge. The Design Manual for Urban Roads and Streets (2013) recommends that new lights should be positioned away from trees, which in time may grow to envelop the lanterns or cast shadows which will render the lighting less effective.

6.5 Trees in Conflict with the Built Environment (Amended February 2019)

Policy: The Council will not normally consider removal of a tree where structural damage can be repaired or reasonably resolved by appropriate engineering solutions.

Trees in an urban environment will inevitably conflict with people and infrastructure which creates pressures for trees to be pruned or felled. The perceived threat of damage by tree roots is sometimes a worry people have about trees near to buildings or built structures. Much of this concern is unwarranted as most trees growing near buildings cause no damage. Tree roots are unlikely to directly penetrate sound footings. Lightly loaded structures, if they have inadequate foundations, may be affected by pressure exerted by tree roots or trunks but in such cases trees are not the primary cause of damage.

The Council recognises that trees under its ownership/management may be implicated in damage to nearby built structures but is also aware that trees are not always the causative agent and that nearby trees often get blamed for damage before a thorough investigation is carried out. Some other reasons for structural failure are inadequate foundation design, general structural failure, poor quality construction, nearby excavations or major works to adjacent properties.

In circumstances where structural damage can be repaired or reasonably resolved by appropriate engineering solutions, the Council will not normally consider removal of a tree, except where the tree is considered to be of poor structural or physiological condition.

Property owners will, at their own expense, be expected to provide evidence from an appropriately qualified professional that a particular tree is or has caused damage to their property and that all reasonable engineering alternatives have been explored before felling will be considered. Where evidence is provided which demonstrates a Council owned tree is the cause of damage, the Council will take appropriate action on a case by case basis.

6.9 Valuing Trees and Compensating for Damage (Amended February 2019)

Policy: The Council will use a standard Amenity Tree Valuation formula to value all Council street trees and use this information to assist in the management of the tree stock.

In recent years there has been increased interest in quantifying the benefits of trees and translating them into financial terms. Several recognised formulae such as the CAVAT (Capital Asset Value for Amenity Trees) and Helliwell systems have been developed to allow authorities to prepare a valuation of their tree stock which can then be used to justify managing the trees as if it were a financial asset of the community. An amenity tree valuation system takes into account: tree size, longevity and condition, site suitability and other attributes to give a monetary value used to help guide management decisions. This is a major step forward as traditionally, the management of trees and woodlands by local authorities has been seen solely as a cost, with no acknowledgement of the financial benefits that trees bring.

It is important to place a monetary value on South Dublin County Council's trees because of the contribution trees make to the economic, social and environmental landscape of the county. Assessing the value of each tree will enable a more effective and efficient level of understanding to be applied to a given tree or group of trees when deciding their future management or removal.

The Council will also use a standard amenity tree valuation system to provide the basis for calculating the replacement value of any trees that have been significantly damaged or removed and the Council will seek this level of compensation from organisations found to be responsible for such damage

6.19 Driveways and New Entrances (Amended February 2019)

Policy: The Council will not normally support either the removal of a tree or cutting of a tree's roots for the construction of vehicle crossovers and/or alterations to residential driveway access, unless the tree is of limited life expectancy or is small enough to be relocated elsewhere. Exceptional circumstances will be considered by the Council on a case by case basis.

Planning permission is required if a property owner wishes to widen an existing access or create a new access to the public road. The Council's Environment Department should be consulted if the grass verge or any roadside trees are affected in order to get advice on the acceptability of a specific proposal and other technical requirements before any planning application is made. A minimum clearance of 3 metres or 10 times the diameter of the tree trunk at its base (whichever is greater) must be provided between the trunk of any street tree and the edge of the crossover unless the Council determines otherwise. The Council's Roads Department should also be consulted if the roadside kerb is to be dishd and a roadside concrete apron laid to provide vehicle access to car parking spaces in front of a house.

As part of the application assessment, the Council will apply a standard Tree Amenity Valuation formula to fully determine the costs associated with the removal and or retention of specific trees associated with the development activity. If the condition of the street tree is declining and its life expectancy is short, tree removal may be considered to allow for the installation of a new driveway crossover. Removal and replacement of trees will be at the cost of the applicant and a new tree will be replanted as close as possible to the original tree.

New Policy Statements:

Tree Root Pruning (Agreed February 2019)

Policy: The Council will carry out root pruning only when viable alternatives to severing the roots cannot be found and where an obvious and positive outcome can be achieved without any long-term damage to the tree.

Tree roots keep a tree healthy and upright. Most roots are found in the top 600mm of soil and often grow out further than the tree's height. If roots are damaged the tree may become unstable or may suffer irreversible harm and eventually die.

Root pruning is generally discouraged as a method of alleviating damage to adjoining property, such as infrastructure uplift or service-line disturbance. This is because the long term implications of sustained and heavy root pruning are unpredictable. The Council will perform root pruning on any tree wherever practicable before removal is considered. Approval of the Council's Tree Officer or Parks Supervisor is required before any tree root over 25mm in diameter is pruned.

Any construction, excavation or installation works being carried out in proximity to trees must be in accordance with British Standard (2012): Trees in relation to Design, Demolition and Construction – Recommendations and with the current NJUG (UK National Joint Utilities Group) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees.

Trees Located Along Private Boundaries Within Parks & Open Spaces (Agreed February 2019)

Policy: The Council will seek to develop long term management plans for trees in parks and open spaces in order to enhance the quality of the environment, maintain a succession of viable and healthy trees and minimise risk to people and structures.

In general, the Council will cut back trees located within adjacent parks and open space areas to provide 3m clearance from property boundaries. In some circumstances it may be more appropriate to fell trees.

Trees Located Within Gardens Of Council-Owned Housing (Agreed February 2019)

Policy: Trees located within the residential gardens of Council-owned housing are to be maintained by tenants as part of their tenancy agreement, except in cases subject to the Housing Department's discretion.

Development of the Built Environment (including Residential Extensions or Annex Developments) in Close Proximity to Established Trees (Agreed February 2019)

Policy: Where there are trees within a proposed planning application site or on land adjacent to it that could influence or be affected by proposed development, including street trees in the ownership or management of the Council, the planning application must include a detailed submission prepared by a suitably qualified Arboriculturist in accordance with British Standard 5837: 2012 'Trees in Relation to Design, Demolition and Construction – Recommendations'.

South Dublin County Council will consider the protection of existing trees when granting planning permission for minor and major developments and will seek to ensure the maximum retention, preservation and management of trees, groups of trees and hedges.

Where development is proposed it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account in all projects.

For all minor and major development applications where trees might be affected, the application must be accompanied by the information below prepared by a suitably qualified Arboriculturist (who through relevant education, training and experience, has expertise in the field of trees in relation to construction) in accordance with British Standard 5837: 2012 'Trees in Relation to Design, Demolition and Construction – Recommendations':

- Tree survey
- Arboricultural impact assessment
- Arboricultural method statement
- Tree retention/removal plan
- Tree protection plan
- Details of retained trees and Root Protection Areas shown on the proposed layout to include those of trees located within the proposed planning application site or on land or a street or roadside adjacent to an application site that could influence or be affected by the proposed development.

As part of the application assessment, the Council will apply a standard Amenity Tree Valuation formula to fully determine the costs associated with the removal, retention or replacement of specific trees associated with the development activity. If the condition of a tree is declining and its life expectancy is short, tree removal may be considered to allow for the new development. Removal and replacement of trees will be at the cost of the applicant and a new tree or trees will be replanted as close as possible to the original tree.

Any tree works that are required prior, during or post completion will be completed by a suitably qualified arborist. The cost of any tree works shall be borne by the applicant. Any proposed works shall be agreed with the Council's Public Realm Section prior to the commencement of development.

Action Plan Updates:

New action under Objective 3 – Prepare and implement a public awareness and education tree programme

Develop a simple promotional flier for distribution into residences where new trees are to be planted to provide advance notification of planting, to promote awareness and appreciation of the positive benefits of tree planting in the neighbourhood and invite and encourage assistance from residents with watering newly planted trees, especially during periods of drought.

Updated Appendices

Appendix 2 (Amended February 2019)

Tree Species Suitable for Street Planting

Latin Name	Common name
Acer campestre 'Elsrijk'	Field maple
Acer campestre 'Streetwise'	Field maple
Acer platanoides 'Globosum'	Maple
Amelanchier arborea 'Robin Hill'	Serviceberry
Betula albosinensis 'Fascination'	Chinese Birch
Betula pendula	Silver Birch
Betula pubescens	Downy Birch
Betula utilis 'Jacquemontii'	Himalayan Birch
Carpinus betulus 'Frans Fontaine'	Hornbeam
Corylus colurna	Turkish hazel
Crataegus laevigata 'Paul's Scarlet'	Hawthorn
Malus 'Royalty'	Crab Apple
Malus trilobata	Crab Apple
Malus tschonoskii	Crab Apple
Prunus cerasifera 'Nigra'	Black cherry plum
Prunus padus 'Watereri'	Bird cherry
Prunus sargentii 'Rancho'	Sargent's cherry
Prunus subhirtella 'Autumnalis Rosea'	Autumn flowering cherry
Prunus 'Pandora'	Cherry
Pyrus calleryana 'Chanticleer'	Ornamental Pear
Quercus robur 'Fastigiata'	Fastigiate oak
Sorbus aria 'Lutescens'	Whitebeam
Sorbus aria 'Majestica'	Whitebeam
Sorbus intermedia 'Brouwers'	Swedish Whitebeam
Tilia cordata 'Greenspire'	Small leaved Lime

Specimen Trees Suitable for Open Space Planting

Latin Name	Common name
Acer pseudoplatanus 'Spaethii'	Maple
Aesculus hippocastanum	Horse chestnut
Alnus cordata	Italian alder
Betula ermanii	Erman's Birch
Castanea sativa	Spanish chestnut
Cedrus atlantica 'Glauca'	Blue Atlas cedar
Cedrus libani	Cedar of Lebanon
Fagus sylvatica	Beech
Fagus sylvatica 'Atropurpurea'	Copper beech
Juglans regia	Walnut
Pinus sylvestris	Scot's pine
Platanus x acerifolia	London plane
Prunus 'Shirotae'	Mount Fuji cherry
Prunus 'Yedoensis'	Yoshino cherry
Pterocarya fraxinifolia	Caucasian wingnut
Quercus ilex	Holm oak

Quercus robur	English Oak
Robinia pseudoacacia	False acacia
Tilia x euchlora	Lime
Ulmus 'Lobel	Elm

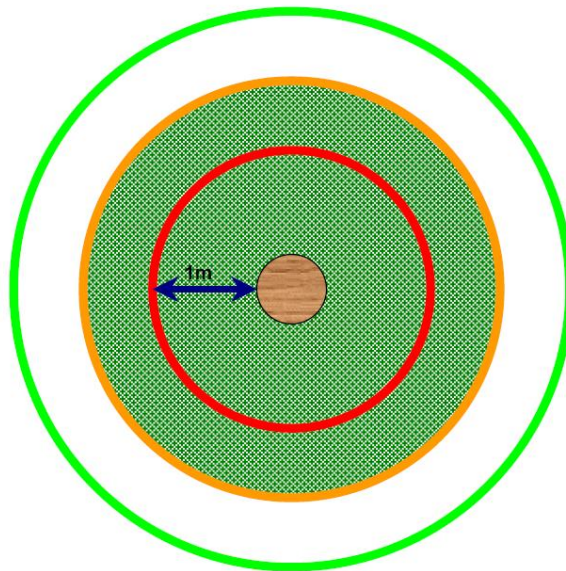
Trees Suitable for Urban Gardens

Latin Name	Common name
Arbutus unedo	Strawberry tree
Acer palmatum 'Atropurpureum'	Japanese maple
Acer davidii	Snake bark maple
Acer griseum	Paperbark maple
Amelanchier lamarckii	Snowy mespilus
Crataegus orientalis	Eastern thorn
Cercis canadensis 'Forest Pansy'	Redbud
Malus 'Golden Hornet'	Crab apple
Malus 'Royalty'	Crab apple
Prunus 'Amanogawa'	Cherry
Sorbus vilmorinii	Rowan

New Appendices:

APPENDIX 4: National Joint Utilities Group (UK) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees

FIGURE 1 – Tree Protection Zone



Key



Trunk of tree



Canopy or branch spread



PROHIBITED ZONE – 1m from trunk. Excavations of any kind must not be undertaken within this zone unless full consultation with the local authority Tree Officer is undertaken. Materials, plant and spoil must not be stored within this zone.



PRECAUTIONARY ZONE – 4 x tree circumference. Where excavations must be undertaken within this zone the use of mechanical excavation plant should be prohibited. Precautions should be undertaken to protect any exposed roots. Materials, plant and spoil should not be stored within this zone. Consult with the local authority Tree Officer if in any doubt.



PERMITTED ZONE – outside of the precautionary zone. Excavation works may be undertaken within this zone, however caution must be applied and the use of mechanical plant limited. Any exposed roots should be protected.

PROTECTING ROOTS - DO'S and DON'TS

There are three designated zones around a tree each of which has its own criteria for working practices.

THE PROHIBITED ZONE

Don't excavate within this zone.

Don't use any form of mechanical plant within this zone

- Don't** store materials, plant or equipment within this zone.
- Don't** move plant or vehicles within this zone.
- Don't** lean materials against, or chain plant to, the trunk.
- Do** contact the local authority tree officer or owner of the tree if excavation within this zone is unavoidable.
- Do** protect any exposed roots uncovered within this zone with dry sacking.
- Do** backfill with a suitable inert granular and top soil material mix as soon as possible on completion of works.
- Do** notify the local authority tree officer or the tree's owner of any damage.

THE PRECAUTIONARY ZONE

- Don't** excavate with machinery. Where excavation is unavoidable within this zone excavate only by hand or use trenchless techniques.
- Don't** cut roots over 25mm in diameter, unless advice has been sought from the local authority tree officer.
- Don't** repeatedly move / use heavy mechanical plant except on hard standing.
- Don't** store spoil or building material, including chemicals and fuels, within this zone.
- Do** prune roots which have to be removed using a sharp tool (e.g. secateurs or handsaw). Make a clean cut and leave as small a wound as possible.
- Do** backfill the trench with an inert granular material and top soil mix. Compact the backfill with care around the retained roots. On non-highway sites backfill only with excavated soil.
- Do** protect any exposed roots with dry sacking ensuring this is removed before backfilling.
- Do** notify the local authority tree officer or the tree's owner of any damage.

THE PERMITTED ZONE

- Don't** cut roots over 25mm in diameter, unless advice has been sought from the local authority tree officer.
- Do** use caution if it is absolutely necessary to operate mechanical plant within this zone.
- Do** prune roots which have to be removed using a sharp tool (e.g. secateurs or handsaw). Make a clean cut and leave as small a wound as possible.
- Do** protect any exposed roots with dry sacking ensuring this is removed before backfilling.
- Do** notify the local authority tree officer or the tree's owner of any damage.

Appendix 5: Code of Practice For Pre Works Inspections of Trees for Nesting Birds

The Wildlife Act 1976 (as amended 2000) is the principle legislation protecting nesting birds in Ireland. The Act makes it an offence to kill, injure or take any wild bird and to take, damage or destroy any nest that is either in use or being built. In general terms, bird nesting in Ireland can be expected to take place between March 1 and August 31.

South Dublin County Council's tree maintenance crews and contractors operating on behalf of the Council are required to carry out pre works inspections of trees for wildlife and nesting birds in line with best practice recommendations. Appendix 1 provides a checklist for pre works inspections for nesting birds.

During the bird nesting season, the following general procedures should be observed:

- Work within dense vegetation should be prohibited (unless directed by An Garda Síochána).
- Trees and shrubs being worked upon shall be single individuals that can be observed in full.
- Carry out the checklist "What to do before tree works" see Appendix 1.
- Complete site inspection form see Appendix 2.
- If the selected tree/shrub is part of a group or immediately adjacent to tree/shrubs, these too should also be inspected for nests. For example felling one tree could expose a nest to a change in micro-climates or predators.
- If at any time, an active nest or a nest that is being built is observed, the tree/shrub must not be worked upon.
- If a nest is observed that it is quite clearly an old or abandoned nest (not maintained/falling apart or clearly not being used – time of year will be a consideration), the tree/shrub may be felled.
- In regard to larger mature trees it should be our aim to work on these trees out of the regular nesting season. However if for health and safety reasons or perhaps responding to wind damage, work should continue with caution. The tree should be continually observed for nests and bird activities.
- Holes in the trunk/branches should be viewed with suspicion and all available measures (eg binoculars, hoist) should be employed to investigate such features further. If a tree is found in a dangerous condition that contains a nest, where possible the work should continue without disturbance to the nest and within the shortest possible time. Where there is possibility the nest may be physically disturbed advice should be taken from The National Parks and Wildlife Services (NPWS).
- Fallen trees and trailing branches in water bodies present nesting opportunities for waterfowl such as Coots and Grebes. Water side trees and vegetation should not be generally worked upon during the nesting season. If there is a necessity to work upon such trees or vegetation (e.g. health and safety issues) then first view the tree/branch/vegetation from as many aspects as possible to identify any nests, including under any waterside branching/vegetation.
- In case of shrubs particularly evergreen species such as Laurel (a favourite with blackbirds) as necessary separate the branches and look in the central areas of the shrub looking for nests.
- At times where formally grown shrubs or hedges are being clipped of current season's growth, an inspection that includes physically moving and separating and visually inspecting the areas to be cut should take place. Operations in such areas should only proceed with caution, with operators prepared to stop if they see anything that concerns them regarding bird movement or activity.

Appendix 1: Pre Works Inspection Checklist for Bird Nesting Activities

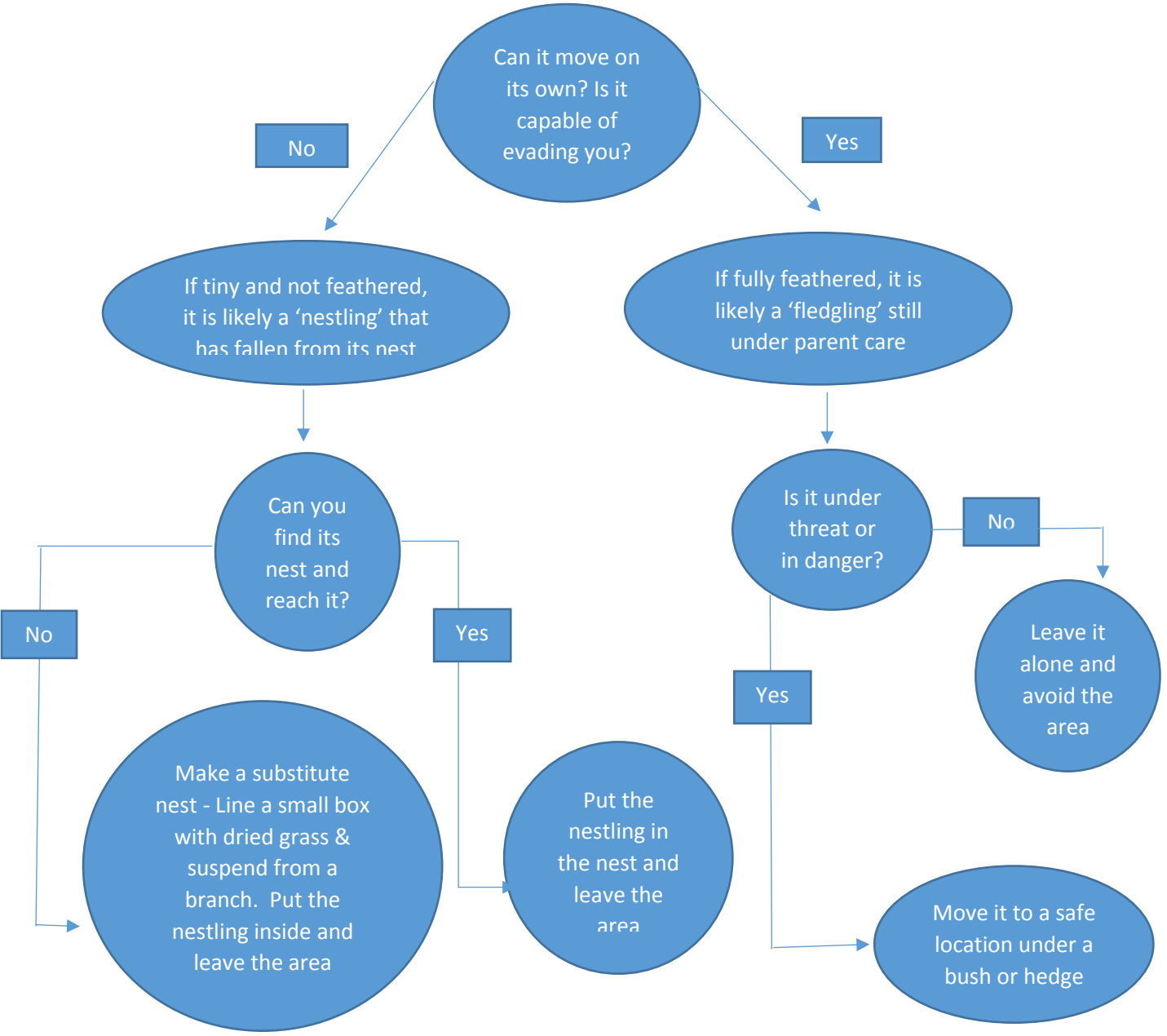
Assessment for Bird Nesting Activities	
Checklist of What To Do Before Tree Work	
Action	Tick when completed
1. Look at the tree from a distance, looking up and down the tree for indications of nesting.	
2. Slowly circle the tree, again inspecting for indications of nesting	
3. Move underneath the tree, again slowly circle looking for nests.	
4. Look on the ground for concentrations of white-coloured droppings, then check the vegetation above again.	
5. Holes in the trunk/branches should be viewed with suspicion and all available measures (e.g. binoculars, hoist) should be employed to investigate such features further.	
6. As you walk through an area, look for birds flying out of vegetation close to you and intensely scolding you; they may have a nest nearby.	
7. Sit quietly and watch for birds that may be bringing nest material or food repeatedly to one place. Birds tend to place their nests just on the undersides of the tree canopy and where branches join together.	
When an Active Nest is Found – Reschedule!	

Appendix 2: Site inspection form for documenting searches for bird nesting activity associated with tree and shrub work undertaken in the bird nesting season (March 1 – August 31)

Assessment for Bird Nesting Activities		
Date		Time
Inspectors name		
Location		
Tree/shrub description		
Site Description		
Description of inspection technique	Ground Inspection	Hoist Inspection

Visual evidence of bird nesting activity	Physical Observation		Physical Nests		Foodstuffs
	Nest Materials		Droppings		Cavities
Final Comments					
Signed					

Appendix 3. If you find a baby bird out of its nest on site. – What to Do



*If clearly injured or known to be orphaned, you may take it to the Dublin Society for Prevention of Cruelty to Animals, Mount Venus Rd, Rathfarnham, Dublin 16. 01 4935502