



Brent Tree Strategy

**Draft Planning
Strategy Document**

May 2025



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Consultation Statement

This draft Planning Strategy Document will be subject to a 16-week period of consultation. This will take place between 29th May and 18th September 2025. Consultation will be consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement (SCI).

The document will be made available on the council's website, as well as in Brent Council libraries. The council will promote it through general awareness raising undertaken through media releases, its social media pages and on its website. In addition, the council will notify all relevant people and organisations on its planning policy consultation database. It will also make all landlords in the borough registered with it, aware of the consultation.

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Representations should be received by the council by midnight 18th September 2025. Please reference the appropriate section and paragraph of the document for each individual comment that you make. Please note that the council will not register anonymous responses. You should provide your name and if relevant, the organisation that you are working for, and that which you might be representing.

When reporting the consultation responses, organisation names will be referenced by the council. However, no individual's name or personal details of respondents will be made publicly available. Please can you indicate with your response whether you wish to be informed by the council of whether this document is adopted. Please also indicate if you would like to be informed of other planning policy consultations by having your details put on our planning policy consultation database. This information will only be used in relation to consultations on the council's planning and associated documents. Unless you indicate that you want to be put on this database, your personal details will only be kept until the council makes a decision on whether to proceed with the adoption of the document or not and has subsequently issued the appropriate notifications. Please see our [privacy policy](#) for more details.

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1. Introduction

1.1 Overview

- 1.1.1 The urban forest comprises all the trees in the urban realm – in public and private spaces, along streets, roads and waterways, and in amenity areas, such as parks. It contributes to the green infrastructure network and the wider urban ecosystem. It also provides numerous benefits to human society, and it does so in vast quantities.
- 1.1.2 This Tree Strategy supports the council's ambition to become one of the greenest and most biodiverse boroughs in London. It plays a key role in our commitment to do all that is reasonable and within our gift to achieve carbon neutrality for the borough by 2030.¹
- 1.1.3 We aim to achieve this in part through developing a collaborative approach to the management of our own tree stock, and through the promotion of best practice in tree and woodland management.
- 1.1.4 It also complements the council's Climate and Ecological Emergency Strategy (2021-2030), Climate Adaptation and Resilience Plan, Green Infrastructure Vision, Brent Local Plan (2019-2041), Air Quality Action Plan (2023-2027) and Tree Management Policy (2017).
- 1.1.5 Trees and woodland form an integral part of the borough and the council manages over 19,000 street trees and 482 hectares of green space across Brent. We recognise the positive impact that urban trees have on the environment and the lives of people living and working in the borough and we aim to protect our existing trees and woodlands in order to maximise their benefits.
- 1.1.6 Tree canopy cover can be defined as the area of leaves, branches, and stems of trees covering the ground when viewed from above.² Research suggests that even moderate increases in tree canopy cover within cities can aid adaptation to the adverse effects of climate change.
- 1.1.7 Across London, the GLA has set a target to increase tree canopy cover to achieve 23% by 2050; approximately 3,300 hectares additional coverage.³ The most effective way to maintain and increase our tree canopy cover is by improving the health and condition of existing trees to maximise their vitality, optimise growth and safeguard their future by allowing them to grow to their full potential.
- 1.1.8 In Brent, the average tree canopy cover is 15.28% and varies from 10.79% in Kingsbury and Tokyngton wards to 27.47% in Barnhill ward. This compares with a national average of 16% and a London average of 21%.

1. Brent Climate and Ecological Emergency Strategy 2021-2030

2. Grove et al., 2006

3. London Urban Forest Plan (2020)

- 1.1.9 This Tree Strategy will help us protect existing trees, as well as provide a resource management strategy for their long-term replacement and the proficient establishment of new trees. This is to ensure tree canopy cover is increased over time, particularly in areas of multiple deprivation and where existing tree canopy cover is low. These areas are often home to the most vulnerable of our residents. It is particularly important in these areas that local communities are empowered to support us in facilitating the necessary change.
- 1.1.10 This Tree Strategy has been drafted in response to national, regional and local policy. It outlines how the council intends to maintain a healthy, diverse, and resilient urban forest across the borough and manage its responsibilities and legal obligations.
- 1.1.11 The key challenges to be addressed by this Tree Strategy are set out below:
- **Thinking in the long term:** considering the environmental changes anticipated over the next 50 years to allow more effective planning and continuity of approach.
 - **Integrating strategies and plans to align actions:** ensuring that climate change and pest and disease management is considered during revisions of all relevant policies and strategies.
 - **Prioritising tree health:** improving the health and condition of Brent's existing trees is a high priority. New planting is crucial but only represents a small proportion of Brent's urban forest and it will take a long time before delivering the extensive benefits that existing trees are already providing.
 - **Expanding and enhancing tree canopy cover:** improving the health and condition of existing trees to maximise their vitality, optimise extension growth and safeguard their future, as well as the establishment of new trees.
 - **Maximising funding opportunities:** including ways of securing future revenue costs for proactively managing trees.
 - **Adopting strong biosecurity practices throughout trees' lifecycle:** embedding strong biosecurity policies and practices throughout the process including procurement, specification, planting, auditing, establishment and maintenance. Encouraging familiarity with signs of ill health in trees and reporting via TreeAlert.
 - **Embracing the power of local communities:** voluntary and community groups already provide an incredible amount of support to the management of Brent's urban forest, often entirely on their own initiative. The commitment, intimate local knowledge and passion that local people can offer is an invaluable resource that should be nurtured and supported.

2. Importance of Trees in Brent

2.1 Overview

- 2.1.1 Brent has a limited number of nationally recognised ecological and built-environment designations, which include a Site of Special Scientific Interest (SSSI) at Brent Reservoir and Local Nature Reserves (LNRs) at the Welsh Harp, Fryent Country Park, and Mason's Field. In addition, it has Sites of Importance for Nature Conservation (SINCs), with some following linear corridors, such as the River Brent and its tributaries, railway lines and the Grand Union Canal.
- 2.1.2 Currently when compared to London standards, the borough lacks open space, particularly in the south. The quality of provision also varies. Brent has some parks and open spaces recognised as being of high quality. These attain the green flag standard and win other awards such as London in Bloom. It also, however, has some that don't perform so well.
- 2.1.3 Brent contributes to the natural green space and tree canopy cover of Greater London. Modern day pressures of increased development and urbanisation mean that we must recognise the essential role that the presence of mature trees play in our ever- evolving urban landscape in removing airborne pollutants, providing shade, reducing flooding and improving the quality of our urban environment.
- 2.1.4 Not only do trees contribute significantly to the visual character and appearance of our urban environment, but they offer numerous biodiversity and public health benefits which can help improve both our physical and mental wellbeing.

2.2 The Benefits of Trees

- 2.2.1 Trees bring many social, environmental, economic and health benefits to an urban area such as Brent. Through the appropriate retention, maintenance and replanting of trees we will ensure we continue to provide these benefits, enable a proactive response to climate change and ensure that Brent continues to be a desirable place to live, work and visit.
- 2.2.2 The environmental benefits of trees include, but are not limited to:
- Improving air quality by removing carbon dioxide from the air and converting it to oxygen (carbon sequestration).¹
 - Cleaning our air by absorbing other pollutants and toxins.²
 - Reducing of urban heat island effect and providing shade.³
 - Aiding flood relief by intercepting rainfall and thus decreasing run-off.⁴
 - Increasing biodiversity, contributing to ecosystems and providing a habitat for wildlife.
 - Contributing to green infrastructure and improving connectivity for wildlife.
- 2.2.3 The socio-economic benefits of trees include, but are not limited to:
- Helping to create attractive neighbourhoods, providing benefits to improve health and wellbeing, and thus contributing to reduced healthcare costs⁵ and helping to build stronger community cohesion.
 - Providing shelter, security, privacy and absorbing sound and thus reducing noise levels.
 - Helping to segregate sustainable transport routes.⁶
 - Increasing economic growth⁷ and prosperity⁸, as leafier environments increase dwell time with a consequent positive impact on local spend.
 - Incentivising businesses to pay higher ground rents.⁹
 - Being associated with higher earners and greater productivity.¹⁰
 - Supporting long term desirable neighbourhoods with reduced crime.¹¹
 - Being an accessible educational resource.

1. Tiwary et al., 2009; Kuhns 2008; McPherson 2007

2. Nowak et al., 2000

3. Gill et al., 2007

4. Hirabayashi 2012; Trees in Hard Landscapes (TDAG) 2014

5. Peachey et al, 2009

6. Davies et al., 2014

7. Rolls and Sunderland 2014

8. Wolf 2005

9. Laverne & Winson-Geideman 2003

10. Kaplan, 1993; Wolf 1998

11. Wolf 2007; Kuo & Sullivan (2001a, 2001b)

- 2.2.4 Trees appreciate with maturity; as their age increases, so does their value and contribution to health, wellbeing, wildlife, and the character of an area. We should never underestimate the value of established trees in the urban environment. The benefits that they provide will not be replicated by new planting for many decades.
- 2.2.5 According to the Brent i-Tree Eco Stratified Inventory Report (i-Tree Report), the borough's street tree population currently has:
- A value of £414 million using the CAVAT (Capital Asset Value for Amenity Trees) methodology.
 - A carbon storage capacity of 9,664 tonnes, with a calculated value of £2,455,422.
- 2.2.6 Annually, it provides a range of quantifiable benefits as set out in **Table 1**.

Table 1: Summary of the total annual benefits of trees

Total Annual Benefits		
Carbon sequestration	240 tonnes	£60,786
Pollution removal (including carbon monoxide (CO), ozone (O3), nitrogen dioxide (NO2), sulphur dioxide (SO2) and particulate matter)	4.5 tonnes	£308,272
Avoided stormwater run-off	8,223 cubic metres	£4,535
	Total annual benefits	£373,593

2.3 Street Trees

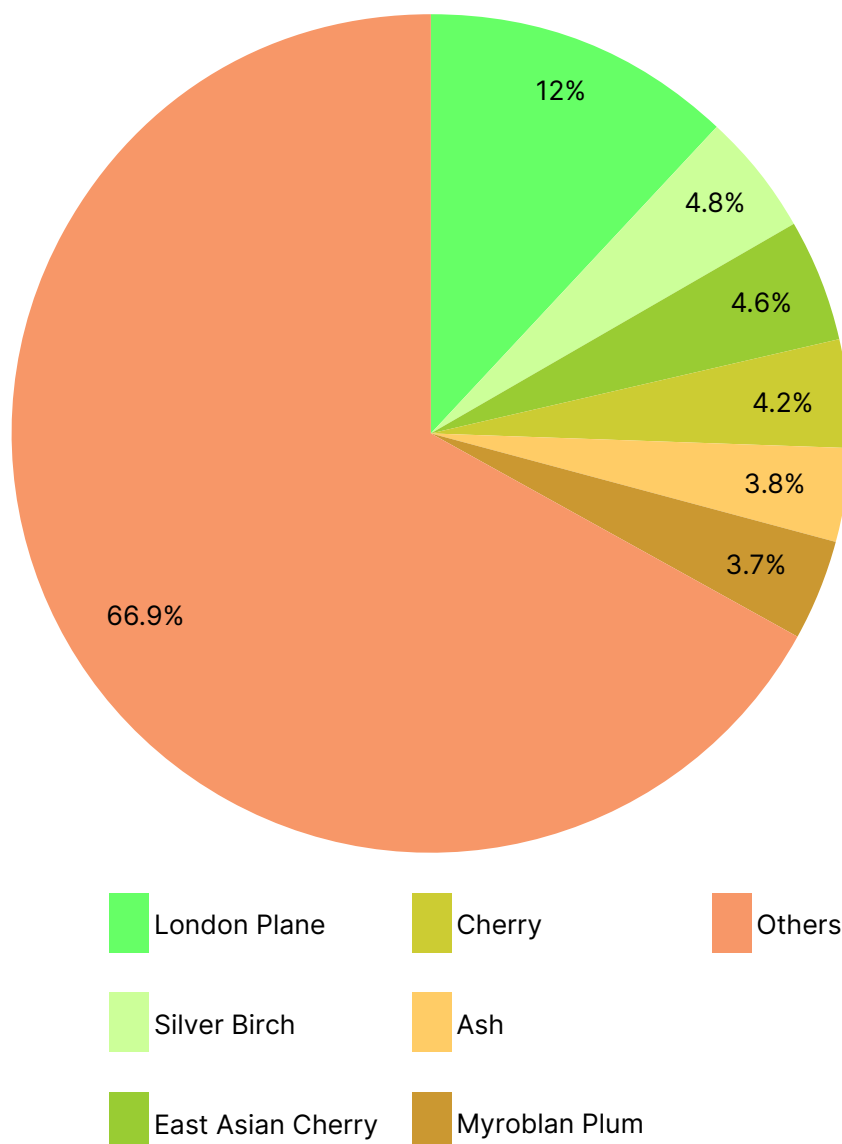
2.3.1 In 2020, the council commissioned an i-Tree Report.

2.3.2 This assessment provides data on the distribution, species, and canopy of street trees in Brent and their benefit to our local ecosystem. The analysis from this report has been used to support the development of this Tree Strategy.

Street Tree Population

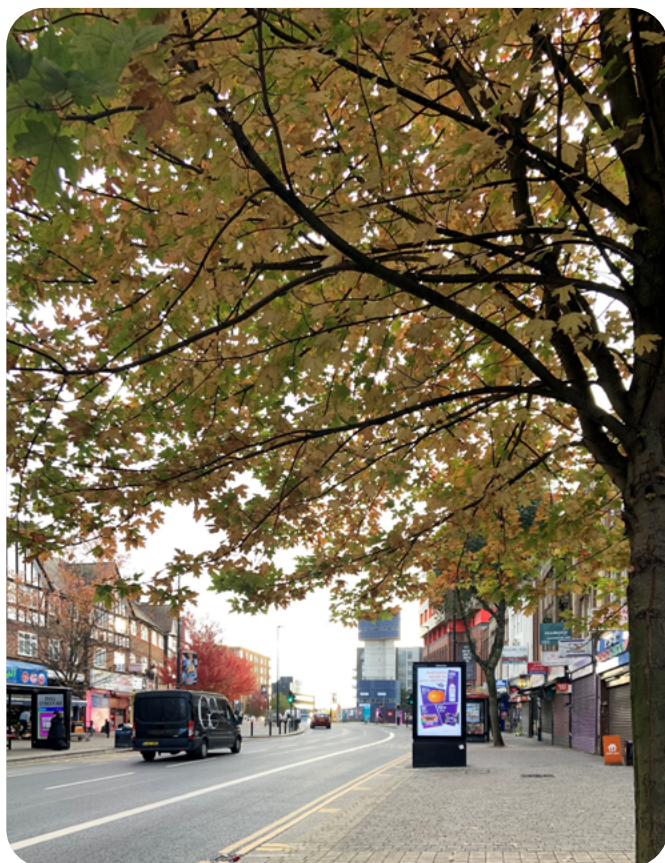
2.3.3 In Brent, there are over 19,000 trees comprising some 162 species. There is a rich species diversity, however more than 10% of the trees are London Plane (*Platanus x acerifolia*).

Figure 1: Percentage population of tree species



- 2.3.4 Like many urban areas, Brent would benefit from having a greater proportion of trees with larger canopies, as part of a diverse range of species to build resilience into its tree population and to reduce reliance on a small number of species.
- 2.3.5 We need to ensure we have enough large and mature trees to deliver the widest range of environmental benefits, however, we also need enough trees in a number of younger age classes to replace those mature trees as they eventually die.
- 2.3.6 The UN Sustainable Development Goal 11 is: ‘providing universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.
- 2.3.7 The rule stipulates that everyone should be able to see at least three trees from their home; there should be a minimum of 30% tree canopy cover in each neighbourhood, and 300 metres should be the maximum distance to the nearest high quality public green space.¹²

Figure 2: Street trees in Brent



12. Konijnendijk 2021

2.4 Tree Canopy Cover

- 2.4.1 The council also commissioned a Tree Canopy Cover Assessment in March 2020 to provide an overview of tree canopy cover across the borough. This provided a measurement of trees growing in parks and on private land together with those trees growing on highways-controlled land, as set out in the i-Tree Report.
- 2.4.2 Measuring tree canopy cover is essential for understanding the beneficial impact that trees will have on air quality, carbon storage and sequestration, urban heat island effect, temperatures and flood risk, collectively known as ecosystem services.
- 2.4.3 The more tree canopy cover there is, the more ecosystem services are provided. An increase in tree canopy cover is a policy target for both the government (Defra) and the Greater London Authority (GLA). The Defra target nationally is 17%.
- 2.4.4 Tree canopy cover in Brent as a whole is currently 15.28%.¹³ This is just below the national average of 15.8%¹⁴ and London average of 21%.¹⁵

13. <https://apps.london.gov.uk/green-cover/?layers=tree-canopy,green&pos=12.3/51.55574/-0.25822>

14. <https://www.forestresearch.gov.uk/research/i-tree-eco/uk-urban-canopy-cover/>

15. Valuing London's Urban Forest, Results of the London i-Tree Eco Project

2.5 Tree Equity

- 2.5.1 The climate emergency is the biggest global threat currently, and its impacts are not felt equally. Those communities facing poverty, deprivation and health inequalities are disproportionately affected by flooding, drought, extreme heat and poor air quality.
- 2.5.2 Tree equity is the idea that all communities should have equal access to the benefits of trees. Trees are essential to public health and wellbeing, yet not everyone has good access to trees and their benefits where they live.
- 2.5.3 Launched in 2023, the Tree Equity Score UK is a map-based application that was created to help address disparities in urban tree distribution by identifying the areas in greatest need of people-focused investment in trees.¹⁶ The tool was co-developed by American Forests, the Woodland Trust and the Centre for Sustainable Healthcare.
- 2.5.4 Tree Equity Score UK can be accessed at: <https://uk.treeequityscore.org/>
- 2.5.5 Tree Equity Score UK produces a score that highlights inequitable access to trees. The score is calculated at the neighbourhood level using LSOAs (Lower layer Super Output Areas) in England and Wales.¹⁷
- 2.5.6 LSOAs are defined by the ONS and comprise between 400 and 1,200 households usually with a resident population of between 1,000 and 3,000 people.
- 2.5.7 The score ranges from 0 to 100. The lower the score, the greater priority for tree planting. A score of 100 means the neighbourhood has enough tree coverage for the area. The priority levels within the tool provide an aid to help interpret the scores as set out in **Table 2**.

Table 2: Tree Equity Score UK scores and priority levels

Score	Priority
0-69	Highest
70-79	High
80-89	Moderate
90-99	Low
100	None

16. <https://uk.treeequityscore.org/>

17. <https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeographies/census2021geographies>

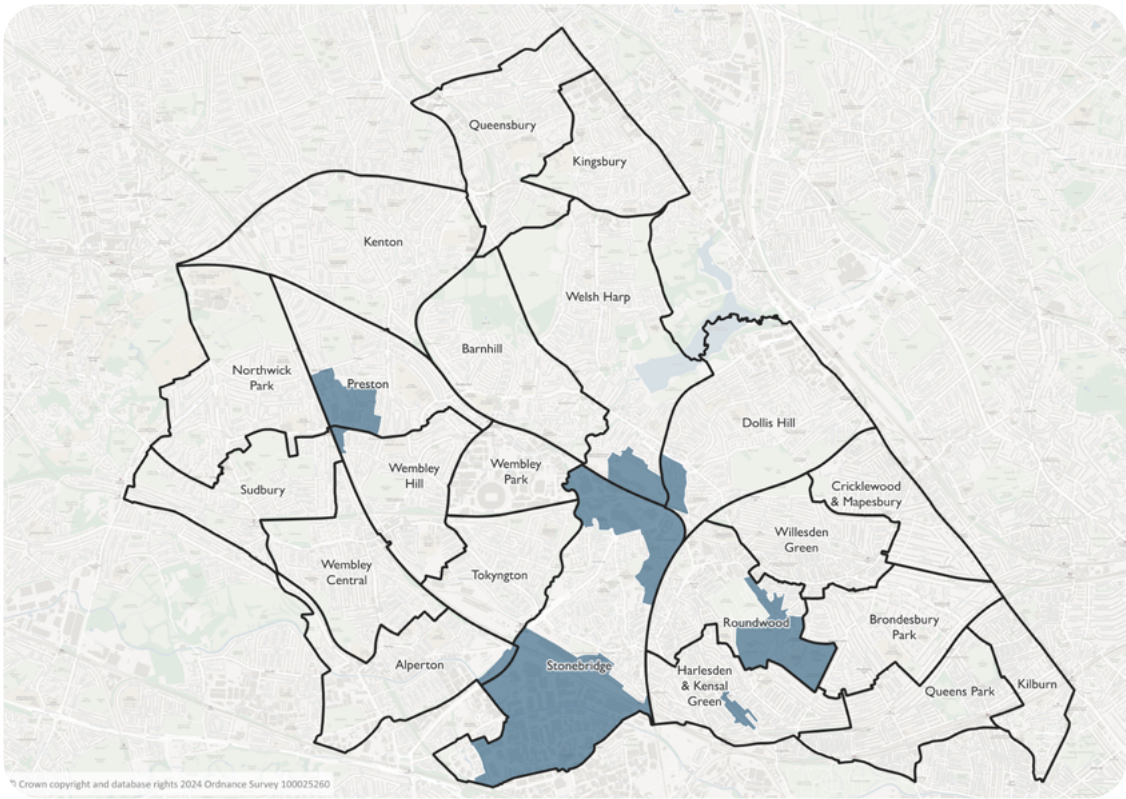
- 2.5.8 Brent has a composite score of 81 which is one of the lowest in London (ahead of the City of London at 76 and Barking and Dagenham at 80).
- 2.5.9 Out of 181 LSOAs across Brent, there are 62 that score below 79, highlighting the areas where tree planting is a high priority. Of those 62 LSOAs, there are six that score below 69, highlighting the areas where tree planting is the highest priority.
- 2.5.10 If we can increase tree planting and thus the score in these areas, we are likely to make the largest difference to tree equity in the borough overall.
- 2.5.11 Ensuring that we are planting climate resilient trees (those that can withstand extreme heat/flooding) and using them to assist with cooling/shading in areas which are at most risk from the urban heat island effect, we will be making the most positive impact. In doing this, we are also encouraging biodiversity and wildlife.
- 2.5.12 A breakdown of how tree equity scores are distributed amongst the 181 LSOAs across Brent is set out in Table 3.

Table 3: Distribution of Tree Equity Scores across Brent:

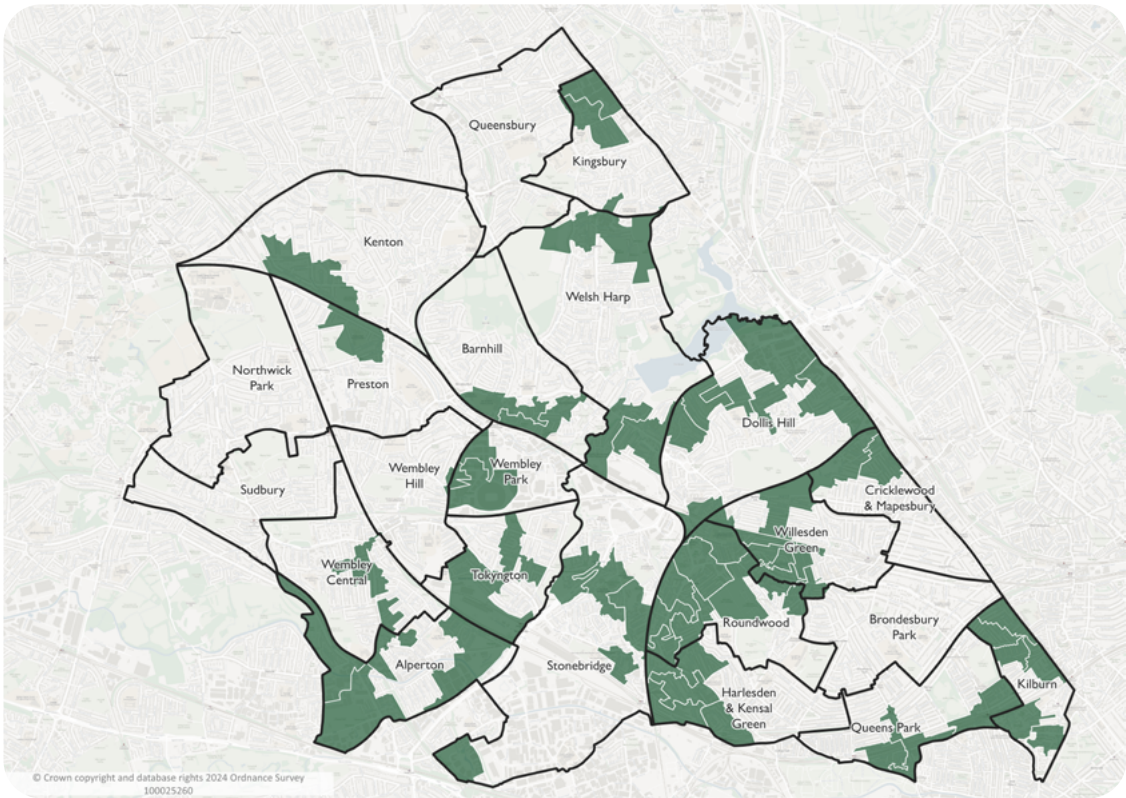
Score	Priority	Number of LSOAs
0-69	Highest	6
70-79	High	56
80-89	Moderate	87
90-99	Low	22
100	None	10

- 2.5.13 LSOAs where there is both the highest and a high priority for tree planting, based on the tree equity scores, are illustrated in **Map 1** and **Map 2** respectively.

Map 1: Brent LSOAs with highest need for tree planting (tree equity score 0-69)



Map 2: Brent LSOAs with high need for tree planting (tree equity score 70-79)



2.6 Air Quality

- 2.6.1 Air pollution is harmful to everyone. There is no safe amount of air pollution and long-term exposure to even low levels of air pollution can impact our health in the future, and this is of particular relevance to children.
- 2.6.2 The health impacts of air pollution are unequal, leading to unacceptable health inequalities, therefore improving air quality remains a priority for the council.
- 2.6.3 Urban trees can alleviate and mitigate air pollution by utilising the chemical components of the pollutant or by reducing the amount of particulate matter through interception from the leaves and branches, until it is washed away by rainfall.
- 2.6.4 The GLA annually measures nitrogen dioxide (NO₂) concentrations to identify areas higher than the European Limit Value. We have a new borough-wide Air Quality Management Area and have identified 21 Air Quality Focus Areas (AQFAs). An AQFA is a location that has been identified as having high levels of pollution as well as high levels of human exposure.

2.7 Carbon Storage and Sequestration

- 2.7.1 Trees can help mitigate climate change by storing and sequestering atmospheric carbon as part of the carbon cycle. Since about 50% of wood by dry weight is comprised of carbon, tree stems and roots can store carbon for decades or even centuries.¹⁸
- 2.7.2 Overall, Brent's street trees store an estimated 9,664 tonnes of carbon with a value of £2.45 million.¹⁹
- 2.7.3 Increasing the number of trees, particularly those with an ability to store more carbon, can therefore slow the accumulation of atmospheric carbon, which is a contributor to climate change.

18. Kuhns 2008; McPherson 2007

19. Brent i-Tree Eco Stratified Inventory Report, Treeconomics 2020

2.8 Stormwater Regulation

- 2.8.1 Urban trees and woodlands regulate stormwater by intercepting and storing rainfall on their leaves, which either subsequently evaporates, or reaches the groundwater reservoir more slowly through gradual release as through-fall.
- 2.8.2 Trees also improve infiltration into the soil by channelling water onto permeable surfaces around the trunk, and through the soil along root channels. Including engineered SuDS (Sustainable Drainage Systems) into planting schemes and flexible paving material around existing mature tree pits in new developments has the potential to increase the water holding capacity of root zones.
- 2.8.3 Delaying the release of stormwater into the drainage system alleviates the risk of localised flooding and reduces the pressure on the ageing tunnel network. SuDS also reduce the pressure on natural watercourses and river systems.
- 2.8.4 In urban areas, the large extent of impervious surfaces increases the amount of run-off. However, trees are very effective at reducing surface run-off through interception and infiltration. The urban canopy of Brent's street trees is estimated to intercept 8,223m³ of run-off per year with an associated value of £4,535.²⁰

Figure 3: SuDS planting in Brent



20. Brent i-Tree Eco Stratified Inventory Report, Treeconomics 2020

2.9 Biodiversity

- 2.9.1 Trees contribute significantly to biodiversity in urban areas and provide habitat for a range of wildlife. This includes dead standing timber and veteran trees, as well as logs left in-situ and brash stacked as habitat piles. Many species of trees that produce nectar and pollen are also of interest to bees and can contribute to the Bee Corridor Project. Particularly good trees for bees include Willow, Maple, Horse Chestnut, Acacia and Lime.
- 2.9.2 Street tree planting and urban trees can play a crucial role in improving wildlife links and connectivity between green spaces along streets.
- 2.9.3 The vision for active travel in Brent is to create an environment and culture in which walking, wheeling and cycling are safe, convenient, healthy and attractive options for everyone, as set out in the draft Brent Active Travel Implementation Plan (2024-2029).
- 2.9.4 Brent's School Streets schemes and Safer Streets and Places programmes, together with projects such as the Wembley to Willesden Junction Healthy Streets scheme, all include tree planting. There is also an aim to help tackle health inequalities within the borough by increasing levels of active travel by taking action to better connect parks and open spaces.
- 2.9.5 A combination of the Environment Act 2021, London Plan Policy G6 and Local Plan Policy BGI1 set out a mandatory 10% increase in biodiversity in most new major and minor developments. Biodiversity Net Gain (BNG) is an approach that creates a quantified enhancement to the natural environment following development to what previously existed.
- 2.9.6 The Defra BNG metric considers habitat condition, distinctiveness and strategic significance of habitats including urban trees to calculate its Biodiversity Unit Value. This is used to inform the appropriate level of compensation required through the planning process.
- 2.9.7 All developments are encouraged to plan for green infrastructure in a way that complements and co-exists with the existing elements. SINC and ecological corridors already provide high value biodiversity. However, to achieve the increase in biodiversity, London Plan Policy G6 and Local Plan Policy BGI1 set a baseline to protect and conserve priority species and habitats that are outside SINC and ecological corridors.

3. Approach to Tree Planting

3.1 Overview

- 3.1.1 Tree planting provides both a symbolic and important contribution to our work to address the climate emergency, helping to raise awareness of the issue and inspire others to take action, while providing a significant range of benefits in helping us adapt to a changing climate.
- 3.1.2 We want to continue our commitment to and investment in tree planting and, as part of this Tree Strategy, to deliver greater benefits for the environment and our communities. Street trees in particular, allow residents to develop a connection to nature close to where they live. Trees and woodland management will be a major consideration in the production of a Local Nature Recovery Strategy (LNRS).

3.2 Maintaining Tree Canopy Cover

- 3.2.1 To maintain tree canopy cover across the borough, the council will seek to retain all mature trees for as long as possible and aim to plant at least one new tree for every tree it removes, although not necessarily in the same place, over the long term.

Figure 4: Tree planting projects in Brent



3.3 Increasing Tree Canopy Cover

- 3.3.1 The council will, subject to resources, encourage new tree planting in areas of low tree canopy cover or low tree equity, through a new Brent Tree Planting Strategy.
- 3.3.2 Tree canopy cover can be increased in some cases, such as in parks simply by encouraging natural regeneration of wooded areas through changing the management regime rather than planting. The new Brent Tree Planting Strategy will focus on the LSOAs that have the lowest tree canopy cover and where tree planting is a high or the highest priority, according to the Tree Equity Score UK score - see **Section 2.5**.

3.4 Increasing Partnership Working

- 3.4.1 Our goals and objectives cannot be achieved by the council alone and require us to continue working with a range of partners to provide opportunities for collaboration that will seek to deliver a series of tree planting programmes.
- 3.4.2 We aim to increase opportunities for residents, 'Friends of' groups and local community groups to get involved in tree planting and management.
- 3.4.3 We want to explore how we can work with schools, businesses, residents and community organisations to complement the council's activities. There is already a diverse network of community and volunteer groups that the council interacts with, and there are members of the community who lead walks and talks about trees (Barham Park, Olympic Way, the Welsh Harp), and help with wildlife surveys.
- 3.4.4 Through a future tree planting programme, we want to enhance and increase opportunities to work together. We will offer workshops for residents, community groups and schools to learn about, and do practical things to support tree wildlife, such as building and installing bird and bat boxes, hedgehog boxes and bug hotels.

3.5 Funding

- 3.5.1 Trees and tree planting is an important part of the infrastructure of any area within the borough and it is therefore considered appropriate to deliver tree planting projects through NCIL funding. This could be used as match funding for other external funding sources secured by the council.
- 3.5.2 Funding for new tree planting will come from a range of other national, regional and local government sources as they become available, including grant opportunities and funding secured through s106 planning obligations and potentially BNG contributions.
- 3.5.3 CAVAT provides a method for understanding trees as public assets rather than liabilities. It is designed not only to be a strategic tool and aid to decision-making in relation to the tree stock as a whole, but also to be applicable to individual cases where the value of a single tree needs to be expressed in monetary terms.
- 3.5.4 Where trees are lost due to development or other reasons, the council will seek to obtain a CAVAT value in order to obtain appropriate compensation for additional tree planting within the borough.
- 3.5.5 When the council undertakes capital programme works, the procurement process allows for a percentage of the contract value to be used for projects that deliver social value. The Capital Programme team will include funding for tree planting projects as part of the social value elements of projects in the future.

3.6 Species Resilience

- 3.6.1 The council will select tree species for planting in the borough based on resilience criteria, using the principles of 'the right tree, the right place'. The species selection process will also be informed by local knowledge and a detailed site assessment.
- 3.6.2 We should be working towards no single species representing more than 5% of the total tree population, no genus more than 10% and no family more than 15%.

Climate Change

- 3.6.3 'Planting for the Future: Kew's Landscape Succession Plan' is a step towards understanding the effects of projected climate on our living landscapes. It aligns the climate of London in 2050 with that of Barcelona today. It predicts that by 2090 45% of Kew's tree species will be at the edge of their known range, with a further 9% outside of their known range, making them increasingly vulnerable. Species such as Oak, Beech, Silver Birch and Holly will be at risk, so by selecting European species of Oak and Beech, which thrive in higher temperatures, we can provide a more robust urban forest.
- 3.6.4 The council will work with relevant organisations to identify knowledge gaps and best practice in managing trees subject to increased stress caused by climate change. We will take guidance from London Tree Officers Association (LTOA), the GLA, the National Environmental Research Council, Kew Gardens, the Trees and Design Action Group and other academic and industry leaders in adapting our approach to tree selection.
- 3.6.5 By creating resilience within the tree population we can effectively manage the risks posed by climate change to ensure that the urban forest that we are planting today is suitable for the urban environment we anticipate for the future. We also want to ensure the urban forest will be resilient to risks associated with the impact of pests and diseases.

Pollen Allergy

3.6.6 There are a number of other potential issues we also need to be aware of, such as the allergy potential of trees. This is linked to the amount of pollen that a tree produces, the flower type, and the sex of the tree. There are three main types of flower found in trees:

- 1) Perfect flowered trees which produce flowers with both male and female parts. These are pollinated by insects and tend to be those least likely to cause allergy, and include apple, pear and magnolia.
- 2) Monoecious trees which include pine, cypress, birch and walnut and which have separate male and female flowers on the same tree. Not all monoecious trees cause allergies, however they are wind pollinated.
- 3) Dioecious trees are trees where each individual tree is either male or female and these rely on pollen moving through the air from male to female trees. These include red maple, ash, holly, poplar, mulberry and willow.

3.6.7 Allergic reactions are related to the size and volume of pollen produced and the ease with which it is dispersed into the atmosphere. It is not suggested that trees which produce high levels of pollen should not be planted, but that careful consideration must be given to what types of tree are to be planted in areas likely to disproportionately impact vulnerable groups, such as young children or the elderly; high pollinating male dioecious trees or monoecious trees should therefore be avoided.

4. Council Tree Management

4.1 Trees on Highways

- 4.1.1 The council will continue its programme of cyclical street tree inspections to ensure the health and safety of trees is maintained, and the potential for tree-related damage and nuisance is kept to a reasonable minimum.

4.2 Trees in Parks, Open Spaces, Cemeteries and Allotments

- 4.2.1 There are over 100 parks and open spaces in Brent, providing over 400 hectares of public open space across the borough.
- 4.2.2 The council also owns and manages three cemeteries within the borough: Alperton Cemetery, Paddington Old Cemetery and Willesden New Cemetery. It also manages and maintains four closed churchyards: St Mary's in Willesden, St John's and St Joseph's in Wembley and St Andrew's in Kingsbury.
- 4.2.3 Outside the borough, the council jointly owns Carpenders Park Cemetery, located within the area of Three Rivers District Council near Watford. Harrow Council owns approximately 25% of the burial land at Carpenders Park, with Brent Council managing the whole cemetery as part of a joint delivery arrangement. This includes all trees within the cemetery.
- 4.2.4 Trees located along main paths through parks and cemeteries (excluding allotments) have a higher inspection frequency than the surrounding area.
- 4.2.5 There are 21 allotment sites throughout the borough which are owned and managed by the council.

Minor Tree Works

- 4.2.6 The council's grounds maintenance contractor can carry out minor tree works and tasks that can be undertaken from the ground without the use of ladders. This includes tree inspections and removal of problematic low branches, planting new trees and some upkeep until established, removal of fallen material, and reporting issues to Brent Parks Services.
- 4.2.7 Tree pruning and other arboriculture operations are carried out in accordance with professional standards, specifically BS 3998:2010, and in accordance with the council's requirements. When felling a park tree, Brent Parks Services will always remove the tree stump to allow for opportunity for future planting.

Pruning of Overhanging Trees

- 4.2.8 Where a private property borders a park, cemetery or allotment, residents can prune branches overhanging their property and leave the debris on council land, with prior permission. The council will arrange for the debris to be cleared. Branch removal should be undertaken in such a way that it does not harm the health of the tree and if in any doubt, residents should employ a qualified arboriculturalist.

4.3 Trees on Brent Housing Management Estates

- 4.3.1 Estates managed by Brent Housing Management (BHM) vary widely in size, building type, and provision of amenity space for residents. We are committed to effectively managing existing trees on these estates and planting new trees through a cyclical maintenance programme.

4.4

Reducing the Potential for Tree Related Building Damage

- 4.4.1 The council cannot remove the risk of subsidence claims, but we remain aware of them and will manage trees accordingly to minimise the likelihood of any claims as far as is reasonably possible.
- 4.4.2 The council's Insurance team currently manage all claims relating to the council's trees. Where a tree is implicated as having potentially caused subsidence damage to a property, the burden of proof is on the claimant to provide evidence that the tree is the cause.
- 4.4.3 Where a claim has been notified to the council, the council may undertake appropriate tree management, on a strictly without prejudice basis in respect to legal liability. Such tree management measures may include cyclical pruning and/or pollarding or, alternatively, removal of the implicated tree or trees. The council will not remove individual trees based on resident speculation of future risk.
- 4.4.4 The council will continue with the following established management regimes:
- Cyclical pruning or selective removal and replacement of council tree stock in areas predisposed to building movement where this is appropriate.
 - Challenging unwarranted claims based on poorly investigated or inaccurate evidence.
- 4.4.5 If homeowners are concerned about council owned trees causing subsidence to their properties, they are advised in the first instance to contact their insurance providers who will be able to provide guidance on how to commission and obtain a written report. On receipt of the report the council will consider the risk, and if deemed necessary, preventative works will be undertaken.

5. Privately Owned Trees

5.1 Trees on Private Land

- 5.1.1 Private trees make a significant contribution to the visual amenity of Brent and provide an important habitat for wildlife. The council encourages owners of private trees to manage their trees correctly and in accordance with good arboricultural practice.

5.2 Care and Maintenance of Private Trees

- 5.2.1 Tree owners have a duty of care towards others' property and should regularly inspect trees in their ownership or care, maintaining them to a good and safe standard. It is advisable to seek advice before carrying out any works to a protected tree either subject to a Tree Preservation Order (TPO) or in a conservation area unless there is imminent danger to the public.
- 5.2.2 Subject to securing the relevant permissions, where appropriate, branches of trees rooted in a neighbouring property that overhang the boundary, may be cut back to the boundary to prevent or abate a nuisance. The term nuisance is used in the legal sense and the branches remain the property of the owner.
- 5.2.3 Where trees on private land are posing an imminent threat to public safety, the council may, as a last resort, serve notice on the owner requesting that work is carried out to make the tree safe. If this notice is not complied with, works can be undertaken by the council and costs recovered from the property owner (Local Government (Miscellaneous Provisions) Act 1976 s23 and s154 of The Highways Act 1980).

5.3 Protected Trees

- 5.3.1 The council will seek to protect and maintain private trees of amenity value using a Tree Preservation Order (TPO) and conservation area legislation in accordance with the Town and Country Planning Act 1990.
- 5.3.2 The statutory definition of a conservation area is “an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”. Conservation areas and their boundaries can be viewed on the council’s website.
- 5.3.3 Existing trees that contribute to the verdant character of a conservation area and which provide a setting for Brent’s architectural heritage will be preserved. Any person wishing to remove or undertake works to a tree within a conservation area, with a trunk diameter of 75mm or more measured at 1.5m above ground level, is required to give six weeks’ notice to the council in accordance with s211 of the Town and Country Planning Act 1990. The council will register, assess and reply to all correspondence within six weeks.
- 5.3.4 Any person wishing to remove or prune a tree under a TPO is required to make a formal application to the local planning authority, in accordance with s198 of the Act. Once the application has been registered it will be assessed and a decision notice issued within eight weeks detailing the outcome. The council may seek to prosecute any person who carries out or allows another to carry out on their behalf unauthorised works to a tree protected by a TPO or within a conservation area.

5.4 Trees Owned by Public Authorities

- 5.4.1 Where issues arise in respect of trees on land owned by other public authorities, such as trees along canals and railways that are the responsibility of the Canal & River Trust and either Transport for London or Network Rail respectively, the council is limited in its powers to intervene.

6. Planning & Development

6.1 Overview

- 6.1.1 The council makes planning decisions on the basis of the policies as set out in the Brent Local Plan (2019-2041), which interprets national and regional planning policy into its local context. The policies relating to trees are set out in **Appendix 1**.
- 6.1.2 In addition to planting new trees, it is important we protect and maintain the existing trees and woodland we have. This involves using our planning powers to minimise the impact of development on trees and woodlands.
- 6.1.3 The council is empowered under s198 of the Town and Country Planning Act 1990 to make Tree Preservation Orders (TPOs) as appropriate to protect trees which are important to public amenity.
- 6.1.4 Policy BGI2 of the Brent Local Plan states where trees are located on or adjacent to a site, the council will require the submission of a tree survey in accordance with BS 5837: 2012 or equivalent. The council's Principal Tree Officer will be consulted on any development which is likely to impact on trees.
- 6.1.5 Trees should be retained wherever possible, and any proposed removal will need to be justified in an accompanying Arboricultural Impact Assessment (AIA). In the case of major development, if it is agreed not to be possible to retain trees on site, developers should provide details of new trees to achieve equivalent tree canopy cover, or a financial contribution for off-site planting.
- 6.1.6 The local planning authority will consult with either the Highways or Parks teams where trees on public land are potentially affected by a development proposal. Any agreed tree removal associated with development will need to be adequately compensated using the CAVAT methodology to determine the value of the tree to be removed, which will then be sought from the developer.
- 6.1.7 CAVAT is regarded as one of the principal methods of tree valuation in the UK and provides a method for managing trees as public assets rather than liabilities. The council's policy is to not allow anyone to pay for the removal and replacement of a tree, except when the agreed CAVAT value is sought as part of the development process.
- 6.1.8 Any unauthorised tree removal or reckless damage leading to tree loss may be referred for legal action and, in such case, the CAVAT value of the tree will be sought in compensation.

6.2 Action Plan

- 6.2.1 To ensure this Tree Strategy goes beyond setting out the context and existing approaches to trees and tree management in Brent, the council has developed an action plan. The action plan defines a series of aims, supported by specific and measurable actions the council aspires to deliver on that can be monitored and evaluated over time.

Table 4: Summary of tree-related aims and actions

Aims	Actions
1) Support the council's climate change initiatives and support delivery of the Climate and Ecological Emergency Strategy 2021-2030.	<ul style="list-style-type: none"> • Achieve a net increase in tree canopy cover in streets and green spaces, where possible, in the context of revenue budget constraints relating to ongoing maintenance. • Achieve a net increase in trees planted within major development schemes. • Work with partners to support the Nature Recovery Strategy by improving green infrastructure connectivity where possible, particularly utilising planting on streets and street verges. • Plant and promote the planting of a mix of climate resilient tree species, including, where appropriate, large canopy species which provide the greatest ecosystem services.
2) Increase street tree canopy cover to improve ecosystem services (air quality, shading, flood risk, public health benefits)	<ul style="list-style-type: none"> • Support Tree Equity Model by seeking to increase tree planting in those areas of the borough with lowest tree equity scores, where possible. • Ensure that appropriate tree planting is secured as part of the process of granting planning permission. • Promote our existing tree planting sponsorship scheme more widely.

Aims	Actions
3) Preserve existing mature trees through good tree management and the use of policies that support good tree management	<ul style="list-style-type: none"> • Promote best practice when managing our tree stock, in terms of promoting diversity of species, canopy size and range of maturity. • Share best practice associated with the management of tree risks, such as subsidence, with other London Boroughs. • Make Tree Preservation Orders (TPOs) proactively to ensure protection of important trees at risk. • Adopt CAVAT (Capital Asset Value for Amenity Trees) where trees are lost to ensure adequate re-provision of tree canopy cover.
4) Promote biodiversity	<ul style="list-style-type: none"> • Promote Biodiversity Net Gain (BNG) and use of the Defra metric to inform an appropriate level of tree planting as compensation required through the planning process in relation to trees. • Explore opportunities for establishing (a) habitat bank(s) in the borough. • Promote the retention of dead wood, veteran trees and habitat piles in the management of our trees. • Support the planting of trees that produce nectar and pollen and are of interest to bees.
5) Support and enhance opportunities for community engagement	<ul style="list-style-type: none"> • Provide information on our website in relating to tree management, maintenance, and tree planting. • Work with schools to promote hedge, tree and orchard planting projects. • Support 'Friends of' groups to engage in tree planting and to promote tree related projects, walks and talks. • Encourage residents to water new street trees.

7. Appendices

7.1

Appendix 1: National, Regional and Local Tree-Related Planning Policy

National Planning Policy

- 7.1.1 The Environment Act 2021 places a mandatory requirement for some types of development to deliver 10% Biodiversity Net Gain (BNG) to restore and protect our environment to deliver on the Government's commitment 'to leave the environment in a better state than we found it'.
- 7.1.2 The National Planning Policy Framework December 2023 set out the government's planning policies for England and how these are expected to be applied.
- 7.1.3 It acknowledges that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change.
- 7.1.4 The England Trees Action Plan 2021-24 (UK Government) interprets the vision specifically relating to trees and woodlands and the role they have in working towards nature recovery and delivering on climate change mitigation.
- 7.1.5 It proposes new guidance through the National Model Design Code on how trees can be included in the built environment, including design parameters for the placement of street trees and incorporating trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

The London Plan (March 2021)

- 7.1.6 Policy G7 Trees and woodlands: states that 'London's urban forest should be protected and maintained, and new trees and woodlands planted in appropriate locations in order to increase the area of London under the canopy of trees'. It goes on to state that development proposals should ensure that wherever possible existing trees of value should be retained; and that if trees are removed to accommodate development that adequate replacement is secured based on the existing value of the benefits of trees as determined by an appropriate valuation system. Planting of additional trees should generally be included in new developments, particularly large-canopied species.
- 7.1.7 The Mayor of London wants to increase tree canopy cover in London by 10% by 2050 and identifies the planting of more street trees as a low-cost contribution towards healthy streets and active travel.

Brent Local Plan 2019-2041

- 7.1.8 The Local Plan takes forward the National Planning Policy Framework and interprets what this means for Brent. There is a presumption in favour of sustainable development with three overarching objectives (economic, social and environment). The following policies relate to trees:
- 7.1.9 Policy DMP1 requires acceptable development to retain high amenity trees.
- 7.1.10 Place and area policies include retention of existing trees where possible (and identify key tree features to be retained) and expect new tree planting to be included as part of the anticipated infrastructure, together with open space provision.
- 7.1.11 Policy BH4 Small Sites and Small Housing Developments in Brent seeks to ensure that the Urban Greening target of 0.4 is delivered in housing developments of less than 10 dwellings. Trees play an important role in contributing to this target.
- 7.1.12 Policy BGI1 Green and Blue Infrastructure in Brent identifies areas of open space deficiency and identifies how development will be expected to provide open space, provides for biodiversity net gain and that development will meet the urban greening factor and support biodiversity.
- 7.1.13 Policy BGI2 Trees and Woodlands sets out expectations as to what information relating to trees will be expected to be submitted in support of planning applications; provision for the retention of trees, and for planting of new trees to achieve equivalent tree canopy cover as appropriate.

Borough Plan 2023-27

- 7.1.14 One of the Borough Plan priority areas is 'A Cleaner, Greener Future'. The council will ensure sustainability is central to the growth of our borough and local economy; and invest to make our streets cleaner and healthier.

7.2 Appendix 2: Air Quality Focus Areas

Map 3: All 21 designated air quality focus areas (AQFAs) in Brent overlaid with the Indices of Multiple Deprivation (IMD) deciles

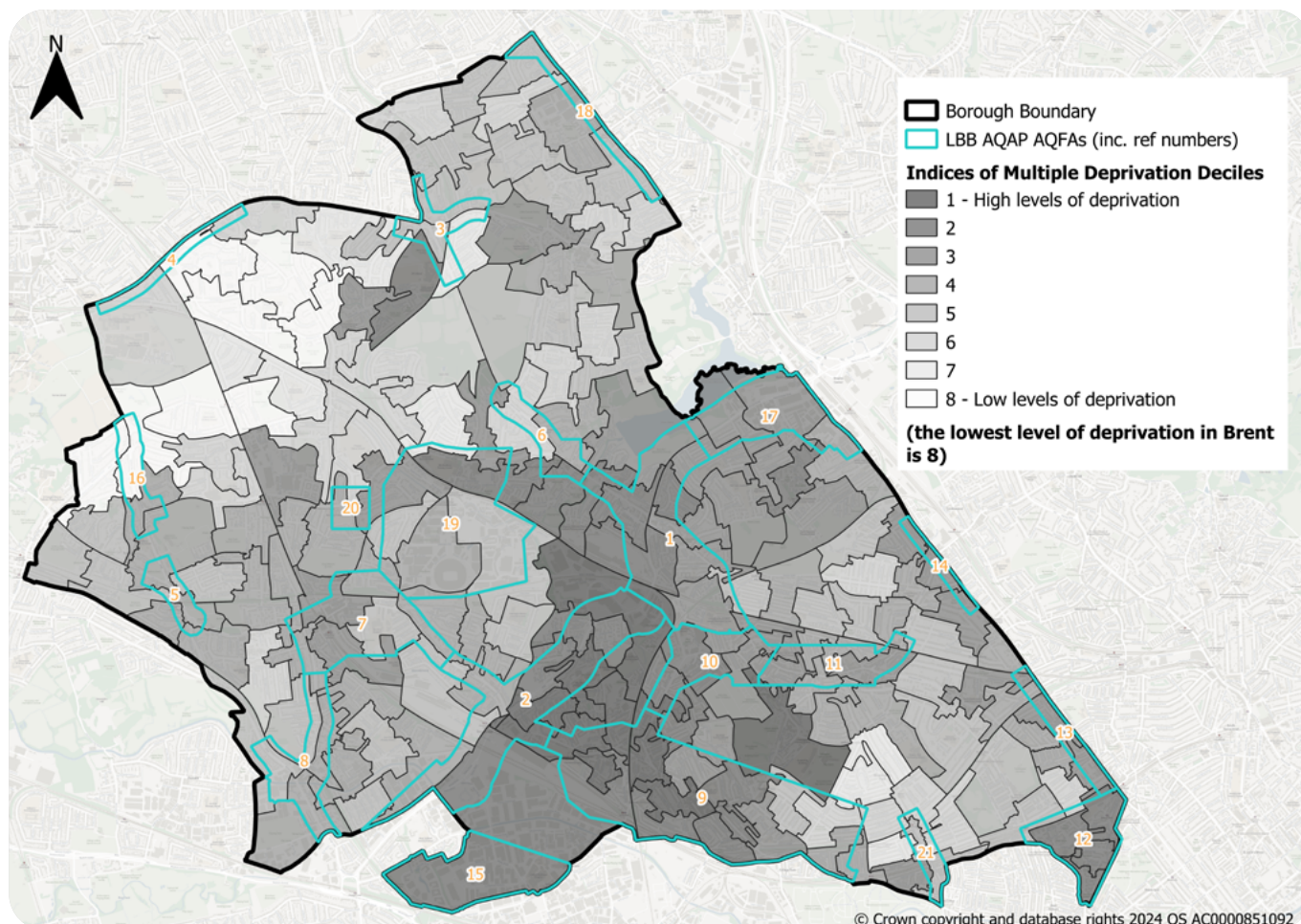


Table 5: Air quality focus areas in Brent

ID	Name	Coverage
1	A406/Neasden/Neasden Stations	A406 corridor and Neasden Lane junction, covers all of Neasden Stations Growth Area and Neasden Town Centre
2	A406/Harrow Road	A406 corridor, covers part of Alpertown Growth Area
3	Kingsbury	Covers all of Kingsbury Town Centre
4	Kenton Road/Northwick Park	Covers all of Northwick Park Growth Area and most of Kenton Town Centre

ID	Name	Coverage
5	Sudbury Town Centre	Covers all of Sudbury Town Centre
6	Blackbird Hill/Salmon Street	
7	Wembley Town	Covers southern part of Wembley Growth Area and southern part of Wembley Town Centre
8	Alperton/Ealing Road	Covers part of Alperton Growth Area and all of Ealing Road Town Centre
9	Harlesden	Covers Harlesden Town Centre
10	Church End	Covers all of Church End Growth Area and Church End Town Centre
11	Willesden Green	Covers all of Willesden Green Town Centre
12	South Kilburn	Covers all of South Kilburn Growth Area and southernmost parts of Kilburn and Queens Parks Town Centres
13	Kilburn	Covers most of Kilburn Town Centre
14	Cricklewood	Covers all of Cricklewood Town Centre
15	Park Royal	
16	Watford Road	
17	A406/Staples Corner	Covers all of Staples Corner Growth Area
18	Burnt Oak/Colindale/The Hyde	Covers large part of Burnt Oak/Colindale Growth Area and all of Colindale/The Hyde and Burnt Oak Town Centres
19	Wembley Park/Ark Academy	Covers most of northern section of Wembley Growth Area and northern part of Wembley and all of Wembley Park Town Centres
20	Wembley Hill Road/West Lane/Preston Road	
21	Kensal Rise	Covers most of Kensal Rise Town Centre

7.3

Appendix 3: Tree Canopy Cover in Brent by Ward

Map 4: Map of tree canopy cover in Brent by ward

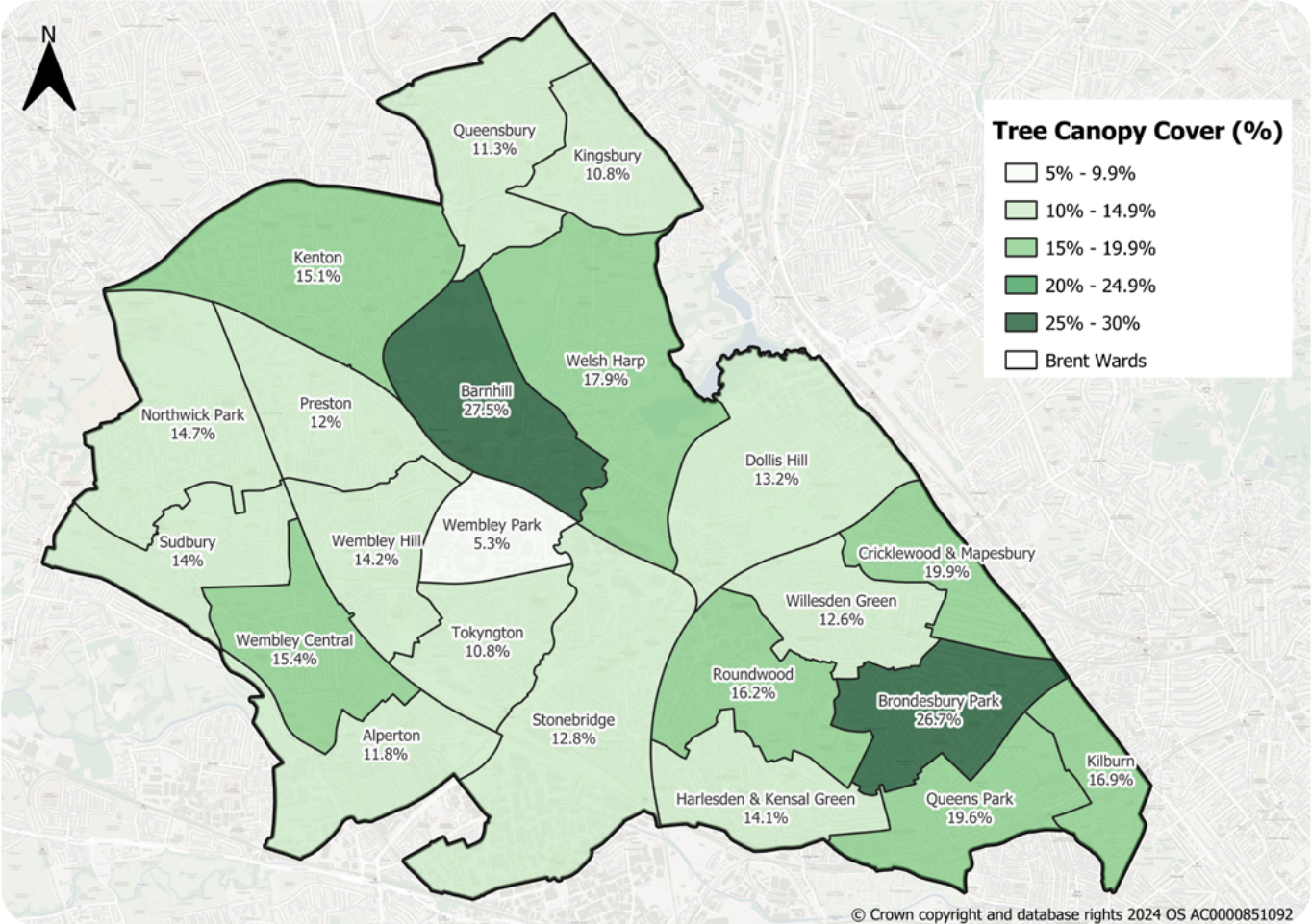


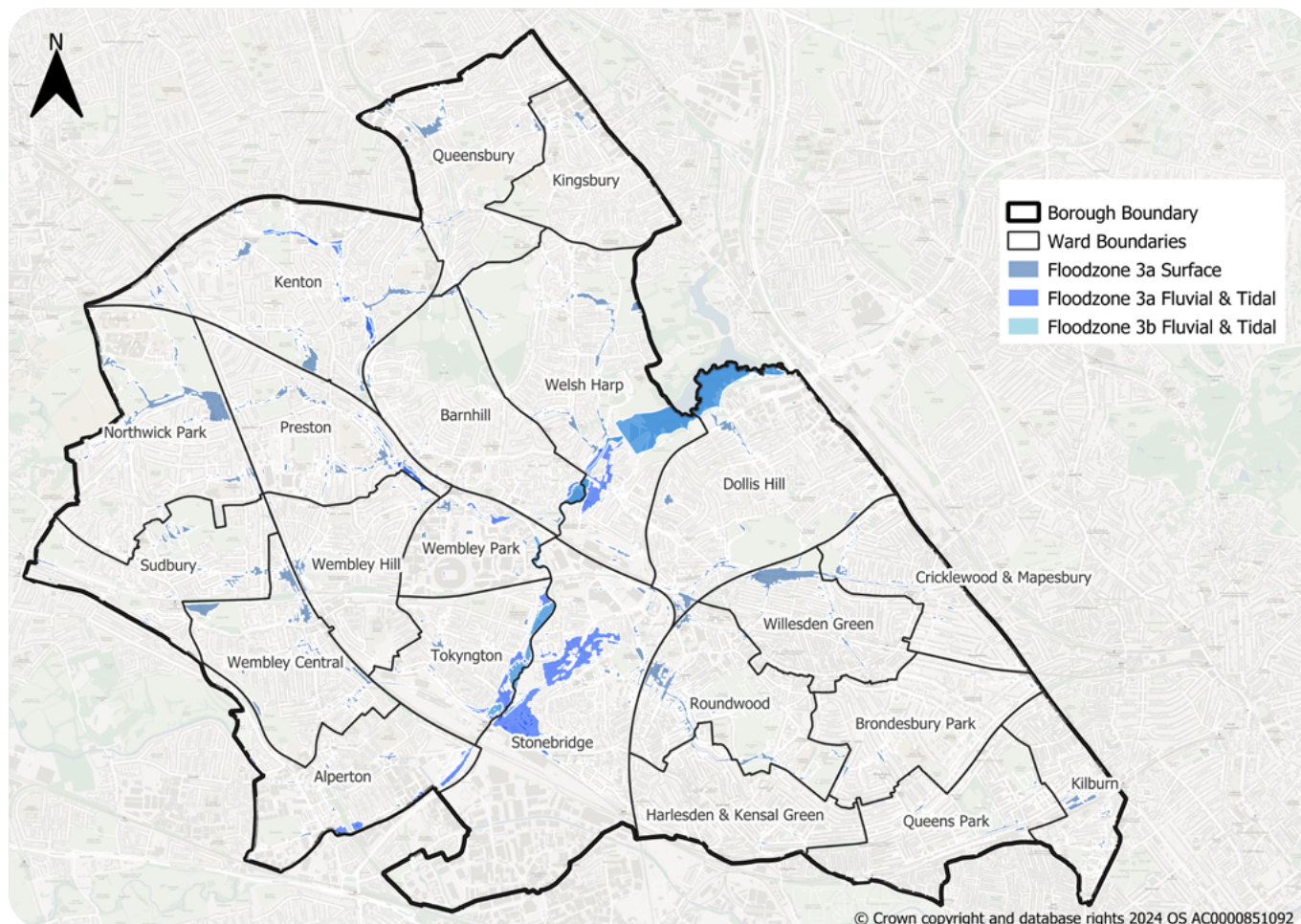
Table 6: Tree canopy cover in Brent by ward

Ward	Tree Canopy Cover
Barnhill	27.5%
Brondesbury Park	26.7%
Cricklewood and Mapesbury	19.9%
Queens Park	19.6%
Welsh Harp	17.9%
Kilburn	16.9%
Roundwood	16.2%

Ward	Tree Canopy Cover
Wembley Central	15.4%
Kenton	15.1%
Northwick Park	14.7%
Wembley Hill	14.2%
Harlesden and Kensal Green	14.1%
Sudbury	14%
Dollis Hill	13.2%
Stonebridge	12.8%
Willesden Green	12.6%
Preston	12%
Alperton	11.8%
Queensbury	11.3%
Kingsbury	10.8%
Tokington	10.8%
Wembley Park	5.3%
Average	15.1%

7.4 Appendix 4: Flood Risk Zones

Map 5: Map of flood risk zones in Brent



7.5 Appendix 5: Bibliography

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