



London Borough of Barking and Dagenham

Trees and Development Supplementary Planning Document

Statement of Representations

December 2011

Introduction

This Statement of Representations has been prepared in accordance with Regulation 18(4)(b).

The Draft SPD, Trees and Development, was consulted upon between 11 June 2011 and 23 July 2011. Representations were received from three organisations within this period.

This document includes the following:

1. A list of the three organisations that made representations.
2. A list of the four respondents that made no comment.
3. A summary of the main issues raised in those representations:
 - The first column identifies who made the representation
 - The second column highlights which section of Draft SPD the representation relates to
 - The third column details the representation made
 - The fourth column details the Council's response to the representation
 - The fifth column contains, where it is deemed necessary, the Council's suggested change to the SPD.

*Please note that the paragraph numbering has changed from the draft SPD to the final SPD with the removal of Section 3 (Consultation).

Trees and Development SPD

Organisations that made representations

| Title | First Name | Surname | Position | Company. Organisation | Representing on behalf of | Date |
|--------------|-------------------|----------------|-------------------------------|--------------------------------|----------------------------------|----------------|
| Mr | David | Hammond | Planning and Advocacy Adviser | Natural England, London Region | | 28 June 2011 |
| Ms | Sarah | Green | Regional Landscape Architect | English Heritage | | 02 August 2011 |
| Miss | Nancy | Young | Planning Liaison Officer | Environment Agency | | 22 July 2011 |

Organisations that registered no comments

| Title | First Name | Surname | Position | Company. Organisation | Representing on behalf of | Date |
|--------------|-------------------|----------------|-----------------------------------|-------------------------------------|----------------------------------|----------------------------|
| Miss | Rachael A | Bust | Chief Planner / Principal Manager | The Coal Authority | | 15 th June 2011 |
| Mrs | Wendy | Dalton | Business Information Officer | Joint Nature Conservation Committee | | |
| | Rose | Freeman | Planning Policy Officer | The Theatres Trust | | 18 July 2011 |
| | Tefera | Tibebe | Strategic Planning Officer | Greater London Authority | | 8 June 2011 |

Trees and development SPD

Comments

| Name / Organisation | Section of Document | Summary of Representation | Council Response | Proposed Changes to the SPD |
|---|----------------------------|---|-------------------------|------------------------------------|
| David Hammond Natural England London Region | Total document | This document is welcomed and commended, linking in to the Biodiversity SPD and Natural England is pleased to see the references to the wildlife potential for trees mentioned. | | |
| David Hammond Natural England London Region | Total document | References to the wildlife and biodiversity of trees is welcomed, as is the contribution that trees can play in helping to green the local environment. | | |
| David Hammond Natural England London Region | Total document | There are clear links to the Core Strategy SPD, as well as other Council's strategies, together with the East London Green Grid. | | |
| Sarah Green English Heritage | Total document | In general terms, English Heritage welcomes the Protection of Trees during Development SPD and SA and the straight-forward good practice advice that the SPD contains. | | |
| Sarah Green English Heritage | Appendix 2 | We welcome the inclusion of the key concept for street trees of 'right tree, right place' in Appendix 2 which will allow a proper consideration of where trees are appropriate in visual and heritage terms in the historic urban environment of the borough. It is essential that decisions are made on the basis of knowledge and there might be a case to be made for commissioning comprehensive research into the historic pattern of on-street and off-street planting within the urban area. | | |

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|------------------------------|---------------------|---|------------------|--|
| Sarah Green English Heritage | Section 4.6 | It is worth noting that the East London Green Grid Area Frameworks form part of a wider, emerging All London Green Grid the draft SPG for which will be put out to consultation later this year. The role of the Green Grid as multifunctional green space should be referenced in the draft Trees and Development SPD. | Agreed | <ul style="list-style-type: none"> • Reference to the All London Green Grid added to Section 3.6 • Definition of green grid as multifunctional green space added to Section 3.6. |
| Sarah Green English Heritage | Appendix 1 | English Heritage is of the view that the protection of trees and the selection of appropriate species is usually consistent with the protection and enhancement of the historic environment and welcome the inclusion of the heritage objective in the borough's Draft Core Strategy (CP2) in the list of Planning Policy and Guidance policies in respect of trees and development sites at Appendix 1 of the SPD. | | |

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|------------------------------|---------------------|--|---|---|
| Sarah Green English Heritage | Section 5 | Consider adding an additional bullet point to reference the need for initial surveys and method statement to include consultation of the Greater London Sites and Monuments Record if new tree pits are being dug in order to ensure that there will be no impact on underground archaeological remains. | Borough Wide Development Policy BP3 Archaeology states that an appropriate assessment and evaluation of archaeological remains should be submitted as part of the planning application for any developments in areas of known or potential archaeological interest and refers to the Greater London Sites and Monuments Record held by the Greater London Archaeology Advisory Service at English Heritage. | None |
| Sarah Green English Heritage | Section 6 | Additionally it would strengthen the guidance if the draft SPD referenced the right tree right place in section 6 (Trees and Landscape Proposals) to ensure that historic character and context is understood when considering new or replacement street tree planting and that the historic landscape as well as the built environment is considered. | Agreed | Added to Section 5.2: "The Right Place Right Tree checklist in Appendix 2 can help ensure that suitable species are planted in the most appropriate locations on the site. " |

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|------------------------------|---------------------|--|---|---|
| Sarah Green English Heritage | Total document | It is essential that there is an adequate programme of aftercare and maintenance for every new tree planting scheme and this should be promoted throughout the draft SPD. | Agreed. Please note that a standard condition is attached to all planning permissions where soft landscaping will be provided. This condition requires the maintenance of all elements of the landscape scheme and the replacement of any specimens that fail within 5 years of planting. In addition, TPOs will be placed on suitable new trees in new developments. | Added to Section 5.2 : “A programme of aftercare and maintenance should be provided for new trees to ensure that newly planted trees continue to contribute to the landscape scheme in the long term.” |
| Sarah Green English Heritage | | English Heritage would strongly advise that the local authority’s conservation staff are involved throughout the preparation and implementation of the Report, as they are often best placed to advise on: local historic environment issues and priorities, sources of data; and consideration of options relating to the historic environment; | The council’s conservation staff and Arboricultural Officer have been consulted on the content of the Trees and Development SPD. | |

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|-------------------------------------|---------------------|---|------------------|---|
| Miss Nancy Young Environment Agency | Section 6.3 | <p>Within section 6.3 it is stated that: "Development sites within 250m of a Site of Importance for Nature Conservation are expected to use only native species of local provenance."</p> <p>However the wording is slightly different within the Biodiversity SPD: "For development sites within 250m of a SINC, wildlife corridor or green / blue infrastructure, only use native plant species of local provenance in landscape schemes."</p> <p>We think that the Trees SPD sentence should use the same wording as in the Biodiversity SPD. This would be more consistent and reflect the benefit of using native species in wildlife corridors and green / blue infrastructure.</p> | Agreed | Section 5.3 changed so it now states: "Development sites within 250m of a Site of Importance for Nature Conservation, wildlife corridor or green / blue infrastructure are expected to use only native species of local provenance in landscape schemes." |
| Miss Nancy Young Environment Agency | Section 9.7 | <p>Section 9.7 states that trees contribute to water vole habitat. This is not strictly true as the overshadowing of trees can actually be detrimental to water vole habitat. In some circumstances it can actually be beneficial to remove trees to allow grasses, reeds and marginal fringe to develop which are more valuable habitat types for water voles.</p> | Agreed. | <p>Two changes (shown in bold below) made to Section 8.7 : "Trees are a common feature of riverbanks and may contribute to water vole habitat."</p> <p>"Any proposal to remove trees on the banks of water courses must demonstrate there will be no negative impact on water voles or their habitat."</p> |