

SALFORD CITY COUNCIL
SUPPLEMENTARY PLANNING DOCUMENT
TREES AND DEVELOPMENT
ADOPTED 19th JULY 2006

STATEMENT OF MAIN ISSUES RAISED IN REPRESENTATIONS

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004

Regulation 18(4)(b)

1 Introduction

- 1.1 Under the Town and Country Planning (Local Development) (England) Regulations 2004, it is a requirement to prepare and publish a Consultation Statement for a range of planning policy documents including Supplementary Planning Documents (SPDs). This is a reflection of the Government's desire to 'strengthen community and stakeholder involvement in the development of local communities'.
- 1.2 This document is a statement of the main issues raised in representations about the draft Supplementary Planning Document, Trees and Development, and how these issues have been addressed in the SPD. It is prepared under Regulation 18(4)(b) of the Town and Country Planning (Local Development) (England) Regulations 2004. This statement also incorporates details from the previous consultation statement, published in January 2006, under regulation 17(1), which details the consultations that were carried out in the preparation of the draft SPD.
- 1.3 In due course, the Council will be adopting a Statement of Community Involvement (SCI) that will set out how the public will be consulted on new planning policy and significant planning applications. Once the SCI is adopted, which is due to be in May 2008, planning documents will be required to conform to its provisions.
- 1.4 This Consultation Statement has been prepared in advance of the SCI, but aims to reflect the intentions of Government planning guidance for reporting on community involvement in the Plan making process. It describes the involvement of stakeholders, the community, voluntary organisations and statutory consultees in the preparation of the Trees and Development SPD.
- 1.5 The consultation process adopted meets both the minimum requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 and the gold standards in community involvement devised by Partners IN Salford.
- 1.6 The city council adopted the Trees and Development SPD in July 2006.

2 Gold Standards IN Community Involvement

- 2.1 Partners IN Salford (Salford's Local Strategic Partnership) have devised 5 aspirational standards for community involvement and all partners of the Council are signed up to delivering community involvement in this way (www.partnersinsalford.org/communityinvolvement). The Gold Standard is a goal for partners to aim towards, particularly where there is activity or proposed change within the City that will have a significant impact upon local communities. They are:
 - 1) Value the skills, knowledge and commitment of local people.
 - 2) Develop working relationships with communities and community organisations.
 - 3) Support staff and local people to work with and learn from each other (as a whole community)
 - 4) Plan for change with, and take collective action with, the community.
 - 5) Work with people in the community to develop and use frameworks for evaluation.

3 Background

- 3.1 The city council has commissioned Urban Vision Partnership Ltd to produce an SPD for Trees and Development. The SPD has been prepared to give guidance to all people involved in the development process about the standard that the Local Planning Authority requires for new development proposals with specific reference to the retention, protection and planting of trees.
- 3.2 Urban Vision has led the ongoing consultation exercise that underpins the process of formulating the policies contained within the SPD.

4 Initial Process of Community Involvement

- 4.1 A number of consultations were undertaken prior to the preparation of the consultation draft SPD, in order to:
- Raise awareness of the role of the Trees and Development SPD;
 - Engender discussion about the previous guidance contained within Supplementary Planning Guidance (SPG), how useful the SPG has been, whether the policies contained within the SPG were appropriate, and if the layout and format of the document needed revision;
 - Seek the maximum contribution of ideas and options from local residents, businesses and other interested parties; and
- 4.2 The consultation exercise included:
- Preparatory and networking meetings with a focus group of architects and developers who frequently submit planning applications to the Council. The discussions held at this focus group were based around several themes:
 - Existing trees and new development;
 - TPOs and TREECAs;
 - Tree planting; and
 - Document format.
 - A summary of the notes and issues raised at the meeting were posted out to all of the people who attended and a further 2 weeks was given for any additional comments to be provided.
 - Preparatory meetings with a focus group of development control officers;
 - The distribution of a questionnaire relating to the SPG and the proposed SPD in relation to Trees and Development. This questionnaire was also made available through the city's website.
 - An external professional arboricultural consultant was provided with a copy of the SPG for review. A follow up meeting was held at the Civic Centre.
- 4.3 Key stakeholders involved in this preliminary stage of consultation are listed in Appendix A.
- 4.4 The main issues raised in the replies to the questionnaires and focus groups held in September and October 2005 were as follows:

Comments Received	Council's Response
Tree surveys should not be requested for every application until the Council's Arboricultural Officer has viewed the relevant trees.	The SPD still requires a tree survey to be submitted as the Council does not possess the resources to view all trees prior to the submission of a planning application.
Trees are viewed as being an irritant and they damage property and gardens.	Trees are a very important part of the landscape of the Salford and should be retained where possible. If protected trees are causing damage to properties, then consideration will be given to their removal.
It was considered that applicants should not have to pay for replacement trees as sufficient trees grow across the City partly	Trees make a significant contribution to the character and amenity of an area. Allowing the removal of trees without adequate

due to self-seeding.	replacement would have a serious detrimental impact on that character and amenity. Self seeding is not considered an acceptable way of retaining the city's tree stock
Distances of both 3.6m and 5m from the furthest extent of a tree to a habitable room window were suggested. However greater flexibility of this distance was encouraged depending on individual circumstances.	The minimum distance of 3.6m has been retained. This is necessary to protect both the tree and the amenity of residents.
Roots should be protected from developments through appropriate fencing.	British Standard 3998 (1999) is referred to within the document and a policy requiring protective fencing has also been added.
Advice from British Standards in relation to trees and development to be updated.	A section within the draft SPD has been included stating the requirements of tree surveys which are required by the Local Planning Authority with any planning applications where trees will be affected. The tree survey within the draft SPD is in accordance with British Standard 5837: 2005 Trees in relation to Construction.

4.5 The consultation networks established to date will continue to be used to guide other proposed SPDs.

5 Formal Public Consultation

5.1 The draft SPD was subject to a period of formal public consultation from 17th February 2006 to 30th March 2006.

5.2 Anyone with an interest in the planning applications process and the retention and planting of trees was encouraged to comment on the draft SPD.

5.3 The SPD documents were available for inspection at the following locations:

- On the council's website: <http://www.salford.gov.uk/spdconsultation> (where they can be downloaded).
- Civic Centre, Salford City Council
Chorley Road,
Swinton, Salford, M27 5BW
- Emerson House, Albert Street, Eccles, M30 0TE. Opening times:
Monday to Friday, 8.30am to 4.30pm.

5.4 The statutory consultees that were formally invited to comment by letter on the draft SPD are listed at Appendix B.

6 Representations Received

6.1 The following organisations/persons submitted representations within the formal public consultation period:

- Greater Manchester Police Architectural Liaison Unit;
- Red Rose Forest;
- GONW
- Moorside Residents Association
- Environment Agency

- Capita Symonds (Arboricultural consultant)
- Worsley and Swinton Residents Association

6.2 Appendix C sets out a detailed schedule of all representations, the council's responses and proposed changes to the SPD.

7 Main Issues Raised

7.1 Tree Surveys (Policy TD1): Additional guidance on assessing the amenity of trees, wildlife considerations, and BS 5837:2005 was requested within this Policy. The council supports these changes and the Policy has been amended accordingly.

7.2 Considerations for Design Layout: Qualification was sought to highlight the fact that it may not be possible to retain some trees and that others can be considered an acceptable loss in terms of the overall development of a site. The council supports this view and the Reasoned Justifications to policies TD2 and 3 have been amended accordingly. In addition the inclusion of reference to the Root Protection Area (RPA) has been included where appropriate.

7.3 New Tree planting: It has been suggested that, where 2 for 1 replacement cannot be reasonably accommodated on site, contributions should be sought for off site contributions. Although the council agree with the intention of this suggestion, off site contributions would have to be secured through a legal agreement. In addition, there would be a requirement to identify sites for the tree planting. There is potential to achieve the latter through initiatives such as Greater Manchester's Community Forest (Red Rose Forest), or through Community Action Plans, but it may not be reasonable to enter into a legal agreement to secure small numbers of trees due to cost implications. However, Policy TD6 has been amended to encourage off site planting where practical.

8 Sustainability Appraisal

8.1 In adopting the final draft, the council must consider how sustainability issues have been integrated into the document and how the Sustainability Appraisal has been taken into account.

8.2 Recommendations for changes to the consultation draft are included in the Sustainability Appraisal report that accompanies the SPD. None of the representations received questioned the content of the SA.

8.3 The appraisal has been amended to reflect the changes to policies made in response to other representations. It is considered that sustainability issues have been adequately addressed. The revised SA is published on the council's website (www.salford.gov.uk/treesdevelopmentspd)

8 Equality Impact Assessment

8.1 In accordance with the Race Relations (Amendment) Act 2000, a first stage Equality Impact Assessment has been carried out on the draft SPD. This concluded that a more detailed appraisal was not required, as the SPD has no significant differential impact on any group.

8.2 The assessment is available on the council's website (www.salford.gov.uk/treesdevelopmentspd)

APPENDIX A

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION PRIOR TO PREPARATION OF CONSULTATION DRAFT

LIST OF STAKEHOLDERS INVOLVED IN CONSULTATION TO DATE	METHOD OF CONSULTATION	
	Focus Group Meeting	Questionnaire and Letter
Philip Allsop Architects		X
Malcolm Lowe Architects		X
Stuart Levethall Architects		X
R A Fisk Associates	X	
Bernard Joseph Architects	X	
I Elton Architects		X
David Young Architects	X	
Acremoss Designs Ltd		X
JC Goodchild Architects		X
Gibsons Treecare		X
Rowbottoms Tree Services		X
B Waddecar (tree surgeon)		X
Barlett Tree Experts		X
R Mullins (tree surgeon)		X
BP Howarth (tree surgeon)		X
Jewish Forum		X
Environment Agency		X
Countryside Agency		X
English Nature		X
English Heritage		X
GONW		X
NWRA.		X
Red Rose Forest Team		X
Rob Sims	X	
Lancashire Wildlife Trust		X
South Manchester Bat Group		X
Claremont Community Association		X
Monton Village Community Association		X
Worsley Village Community Association		X
Broughton Heights Residents Association		X
Boothstown Residents Association		X
Cliff Residents Association		X
Cliffside Homewatch and Residents Group		X
Duchy Road Residents Association		X
Ellesmere Park Residents Association		X
Lower Broughton and Cliffside Residents Association		X
Moorside South Residents Association		X
White Lane Residents Association		X

Row Green Civic Trust		X
Worsley Civic Trust and Amenity Society		X
Neighbourhood Manager – Claremont/Weaste & Seedley		X
Neighbourhood Manager – Ordsall & Langworthy		X
Neighbourhood Manager – East Salford		X
Neighbourhood Manager – Swinton		X
Neighbourhood Manager – Little Hulton & Walkden		X
Neighbourhood Manager – Irlam/Cadishead		X
Neighbourhood Manager – Worsley & Boothstown		X
All Ward Councillors		X

APPENDIX B

STATUTORY CONSULTTEES WHO WERE INVITED TO COMMENT ON THE DRAFT SPD (IN ADDITION TO THSOE LISTED IN APPENDIX A)

Bolton MBC
Bury MBC
CABE
Civic Trust (Northern Office)
English Heritage
English Nature
GM Archaeological Unit
Government Office North West
Greater Manchester Ecology Unit
Greater Manchester Geological Unit
Manchester City Council
North West Development Agency
North West Regional Assembly
Salford CAB
Salford Disability Forum
Sustainability North West
The Countryside Agency
The Environment Agency
Trafford MBC
Warrington BC
Wigan MBC

APPENDIX C

SCHEDULE OF RESPONSES TO CONSULTATION DRAFT

ORGANISATION	SUBJECT	CHAPTER	PARA	POLICY NO.	COUNCIL INTERPRETATION	COUNCIL'S RESPONSE	PROPOSED CHANGES
Greater Manchester Police	Protection of sight lines and light sources	Na	Na	Na	No specific changes are sought although advice is provided relating to new tree planting and the maintenance of good visibility. It is advised that sight lines should not be obstructed and that trees should not be planted adjacent to street lighting columns or other important light sources as this will (eventually) cause obstruction. Obstruction to lighting and sight lines can encourage crime and the fear of crime.	The Council supports these views. Consideration of these issues is already referred to in the 'Considerations for Layout Design' chapter. However, an additional reference has been included to highlight the importance of protecting sight lines.	Inclusion of reference to protecting sight lines in paragraph 5.2 (c).
Red Rose Forest	Title	Na	Na	Na	Request to change the title of the document from 'Trees' to 'Trees and Development'	The Council supports the amendments to the title.	Amend the title of the SPD to 'Trees and Development'
Red Rose Forest	Replacement tree planting	09 - New Tree Planting		TD6	The title of this section should be "Replacement Tree Planting" not "New Tree Planting" as replacement is what policy TD6 specifically refers to. The Policy itself is best reworded to; " In the case of replacement tree planting the Council will require the replacement on the basis of two new trees for each tree lost. The size and species of the trees shall be agreed with the development control section and maintained for a set period via a condition of planning. Where	The Council supports the amendment to the title of this chapter. Amendments to the policy are also considered appropriate, but it is not considered necessary to refer to the use of conditions in the Policy text. Further reference to the use of conditions has been included in the Reasoned Justification. Off site tree planting would	Amendments to Policy TD6 to make reference to the Local Planning Authorities agreement being reached on size and species. Reference to off site contributions has also been included.

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					replacement trees cannot be practically accommodated onsite the developer will be expected to contribute to offsite planting."	need to be secured through a legal agreement which may not be practical for small numbers of trees. In addition, land for offsite tree planting would have to be identified. However, it is considered reasonable to amend the policy to encourage off site planting where practicable.	
Red Rose Forest	Reference to Red Rose Forest	02 - Trees and Development and the Need for this Document	2.8		Should read "Greater Manchester's Community Forest, Red Rose Forest, will.."	The Reasoned Justification of Policy EN9 of the City of Salford Replacement UDP has been included in the SPD for information. It is not possible to alter this text as it refers to another document.	No changes proposed.
Government Office North West	Tree Surveys	04 - Tree Surveys		TD1	Guidance should be given in the reasoned justification for Policy TD1 to applicants on how to assess the amenity value of a tree. In this regard your attention is drawn to paragraph 3.3 of Tree Preservation Orders, A Guide to the Law and Good Practice, DETR, 2000 which indicates that in making TPOs the following three criteria should be taken into account in assessing 'amenity value': 1) Visibility: the extent to which the trees or woodlands can be seen by the general public will inform the LPA's assessment of whether its	The Council supports the inclusion of additional guidance on this matter.	Inclusion of additional guidance on assessing the amenity value of trees has been included in the Reasoned Justification of Policy TD1.

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					<p>impact on the local environment is significant;</p> <p>2) Individual impact: the mere fact that a tree is publicly visible will not in itself be sufficient to warrant a TPO. The LPA should also assess the tree's particular importance by reference to its size and form, its future potential as an amenity, taking into account any special factors such as its rarity, value as a screen or to the character or appearance of a conservation area;</p> <p>3) wider impact: the significance of the trees in their local surroundings should also be assessed, taking into account how suitable they are to their particular setting, as well as the presence of other trees in the vicinity.</p>		
Government Office North West	Acceptable loss of trees	05 - Considerations for Layout Design		TD2 and TD3	Policies TD2 and TD3 are too restrictive. They do not take account of the unavoidable loss, or the acceptable loss, of trees that are referred to in the parent UDP policies EN9 and EN10. There will be circumstances where the loss of trees is either unavoidable or acceptable. Here the approach should be to minimise the loss of amenity through the planting of replacement trees wherever this is possible. The policies	The Council supports the qualification of these policies to reflect the loss of some trees that are unavoidable or acceptable.	A new sentence has been included at the beginning of the Reasoned Justification to highlight it's application only to trees whose retention is considered reasonable and necessary.

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					need to be reworded to make allowance for this.		
Government Office North West	Tree retention	06 - Existing Trees and Protection		TD4 and TD5	It should be made clear that Policies TD4 and TD5 refer only to trees to be retained on a particular site.	The Council supports qualification of these policies.	Inclusion of a sentence at the beginning of the Reasoned Justification to highlight that the policies only apply to onsite trees whose retention is considered necessary and reasonable.
Moorside Residents Association	Tree Surveys	04 - Tree Surveys		TD1	Concerns have been raised that trees which are supposed to be retained are sometimes felled. In addition, the identifying markings on protected trees are not always clear.	The felling of trees that are to be retained as part of a planning permission may jeopardise the validity of the permission. In such cases enforcement action will be considered. An additional reference has been included in Policy TD1 to encourage clear tagging of trees that have been surveyed.	An additional reference has been included in Policy TD1 to require clear tagging of trees that have been surveyed.
Environment Agency	Protected species	04 - Tree Surveys		TD1	This policy will need to assess fully any implications of a proposed development, or any works which will involve the felling of trees that it will have no impact on any protected species. This is to ensure compliance with existing wildlife legislation i.e., The Wildlife and	Policy TD1 requires consideration to wildlife features to be taken into account as part of any tree survey. However, an additional statement has been added to the Reasoned Justification.	Add the following to the Reasoned Justification: "The survey should demonstrate that development would have no impact on

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					<p>Countryside Act (1981), the Countryside and Rights of Way Act (2000) and the Conservation (Natural Habitats etc) Regulations (1994), which protect wild birds, their nests and eggs and other wild animals including bats and their roosts.</p> <p>The Forestry Commission will need to be consulted on any development proposals that affect ancient semi natural woodlands. Developers should be made aware that there may be a need to obtain a felling licence, if they intend to fell trees not included in the area within the red line of the planning application.</p>	<p>The only ancient woodland in the city is a small area within Clifton County Park, which is owned by the city council and is protected as a site of Biological Importance. Therefore, specific reference to it within the SPD is unnecessary.</p>	<p>any protected species, in order to comply with national legislation that protects wild birds, their nests and eggs, and other wild animals including bats and their roosts.”</p>
Environment Agency	Tree Replacement	09 – New Tree Planting		TD6	<p>1) The replacement tree ratio be based on the tree survey assessment. 2) Encouragement of good practice for landscaping schemes, particularly where these are identified adjacent to wildlife sites, wildlife corridors, and river corridors. It is recommended that the SPD refer to the 'Flora locale' technical notes 6,7,9 for guidance on these aspects and be referred to in an appendix. 3) Investigate opportunity through this SPD to actively promote and expand the planting of the Manchester (Black) Poplar (<i>Populus nigra betulifolia</i>) which</p>	<p>1) Although the number and species of replacement tree planting will be influenced by any tree survey, it is considered practical and appropriate to set a minimum standard of 2 for 1 replacements for every tree felled. Using a 2 for 1 replacement approach ensures that decisions are consistent and that all proposals are considered on a similar basis. It also provides a clear standard</p>	<p>1) Amendment of Policy TD6 to state 'at least' a 2 for 1 replacement ratio. 2) Reference to the Flora Locale website has been added to the SPD. 3) Specific reference has been included to this tree in Policy TD6.</p>

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					is very rare and under threat from disease.	<p>which can be taken into account and applied simply which can help speed up the decision making process. The removal of this standard could lead to inconsistencies in decision making and a slower decisions on applications.</p> <p>2) The encouragement of native tree planting is supported. Reference to the Flora Locale website and the Nature Conservation and Biodiversity SPD have been added to the SPD.</p> <p>3) Encouraging the planting of this tree is supported where the local context is appropriate. Specific reference has been included to this tree in Policy TD6.</p>	
Capita Symonds	Advice and Guidance	02 – Trees and Development and the Need for this Document.	2.16		Consider changing Para 2.16 to: This SPD therefore aims to inform and provide guidance to landowners and developers about (i) the requirement to accurately identify existing trees that are suitable for retention and need to be integrated into the development before the design stage (ii) how such retained trees are best protected for the long-term (iii) the impact of the development on trees	The Council supports the changes.	Modify text as recommended.

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					on adjacent land and the effects these trees are likely to have upon the proposal and (iv) where new or additional tree planting is to be carried out. The guidance will also be used in the consideration of planning and other appropriate applications and in support of planning conditions.”		
Capita Symonds	Tree Surveys	04 – Tree Surveys		TD1	Consider an additional paragraph along the lines: In addition to the benefits previously detailed, trees can have a negative impact and be a constraint for development. It is therefore vital that developers and landowners carry out a detailed tree survey that will be able to inform the design of where trees should be retained, this also has the additional benefit of identifying those trees that can be removed without significant loss. Such a survey is key in establishing when the loss of trees outweighs any benefits of the development and vica versa.	Specific advice on tree surveys is contained in Chapter 4 of the SPD. Additional guidance has been included in the introductory chapter to highlight the benefits of carrying out a tree survey.	Amendments to para 4.1 to highlight benefits of carrying out a tree survey.
Capita Symonds	Policy EN10 of UDP	02 – Trees and Development and the Need for this Document	2.11		Para 2.11, line two, consider amending to read “...because of their high public amenity value.....” Lines 4-5 consider amending to read “...loss. Where it can be demonstrated that the benefits clearly outweigh.....” The latter indicates clearly that the applicant will have to provide evidence and reasoned	The Reasoned Justification of Policy EN10 of the City of Salford Replacement UDP has been included in the SPD for information. It is not possible to alter this text as it refers to another document.	No changes proposed.

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					argument rather than a mere statement.		
Capita Symonds	Tree Surveys	04 – Tree Surveys	4.1		Para 4.1, last sentence. Consider amending to read “.....will also help to identify trees that can be removed, potential areas.....landscaping.	The Council supports the changes.	Modify text as recommended.
Capita Symonds	Tree Surveys	04 – Tree Surveys		TD1	A number of recommendations are made to amend the text of Policy TD1 to make it more accurate and easier to understand. These relate to: 1) Inclusion of extracts from BS5837:2005; 2) Removal of canopy spread reference in first part of policy as it is mentioned later in policy again; 3) Need to mention drainage details. 4) Inclusion of reference to Wildlife and Countryside Act 2001. 5) For trees offsite a need to change details of policy to '12 times' diameter of the stem measured at 1.5m above ground level. 6) Use of tags. 7) Re-wording of one bullet to read: "A full schedule of tree works including those to be removed and those remaining that require remedial works to ensure acceptable levels of risk and management in the context of the proposed development. The method of disposal of all arisings should also be included along with the precautions to be taken to avoid	Although the majority of amendments are supported by the Council, it is considered adequate to reproduce elements of BS5837:2005 as opposed to the inclusion of extracts. Following further discussion with Capita, it was agreed that it would be more appropriate to retain the bullet referred to in point 5, and instead include an additional bullet relating to the identification of the Root Protection Area of each tree in a survey. The "12 times diameter of stem at 1.5m" relates to the calculation of the RPA.	Modify document as recommended except for the inclusion of an extract from BS 5838:2005. Include additional bullet relating to Root Protection Area.

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					damage to Root Protection Areas and trees to be retained."		
Capita Symonds	Considerations for layout Design	5	5.1 (now para 6.1)		Para 5.1, add in The developer shall use the Tree Survey data to prepare a Tree Constraints Plan (TCP) detailing accurately for Category A, B and C trees the Root Protection Area (RPA) and the above ground constraints, namely current and potential tree height and current and maximum branch spread.	The Council supports these changes.	An additional sentence has been included after paragraph 5.1 to refer to TCPs.
Capita Symonds	Considerations for layout Design	5		TD2	Policy TD 2: This needs to be updated to reflect the improvements in BS5837:2005. Consider amending to: Where trees are to be retained no development shall take place within the Root Protection Area (RPA) or the maximum spread of the tree at maturity. Reasoned justification: How to accurately identify the RPA is set out in BS5837:2005 and it is now recognised that this may well extend beyond the branch spread where there are barriers to root development on one or more sides of the tree. The physical size.....etc	The Council supports these changes.	Amend Policy TD2 to reflect the recommendations made.
Capita Symonds	Considerations for layout Design	5	5.2b		Change from second sentence as follows: Similarly, the routing of underground services through the RPA should be avoided, trenching will sever any roots present and may also affect local soil hydrology. Services should be kept together and	The Council supports these changes.	Amendments to para 5.2b as recommended.

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					trenchless techniques used wherever possible. Where it is not possible to avoid services passing through the RPA, the developer should provide a Method Statement and detailed plans demonstrating how damage to roots will be minimised.		
Capita Symonds	Considerations for layout Design	5	5.2d		Para 5.2d. Change to: Ground levels within the RPA must not be raised or lowered and it is preferable for these areas to be left unpaved, however consideration will be given where the use of suitable "non-dig" design is used that avoid root loss and prevent future compaction. Further guidance is contained within the British Standard.	The Council supports these changes.	Amend paragraph 5.2d in accordance with the recommendations.
Capita Symonds	Existing trees and protection of trees during construction	6		TD4	TD4. This also needs to be changed to reflect the new BS. Fencing around the RPA or extent of canopy whichever is the greatest distance is needed, the first to protect the roots and the second to prevent damage to branches if the RPA is not to the extent of the canopy. This distance will be identified at the application stage.	The Council supports these changes.	Amend Policy TD4 in accordance with the recommendations.
Capita Symonds	Existing trees and protection of trees during construction	6		TD5	TD5. Add ' within the RPA' to first sentence (i.e. where excavation works within the RPA are unavoidable.....)	These changes are supported by the Council	Amend Policy TD5 in accordance with the recommendations.
Capita Symonds	Tree Preservation	7	7.1		Para 7.1, ".....include 'public' after ' high' in para 7.1 (i.e. high public	The Council supports the textual amendment. However,	Inclusion of 'public' after 'high' in para

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	Orders				amenity value.....") It is suggested that a separate information leaflet be made available to anyone applying for consent that can give more detail on what is and isn't acceptable.	the guidance contained within the SPD together with that of the British Standard, is considered sufficient to provide guidance for developers.	7.1.
Capita Symonds	New tree planting	9	9.1		Change text to: "Whilst some trees may survive for a long time they do not live forever and they will....."	The Council supports the changes.	Amend Para 9.1 in accordance with the recommendations.
Worsley and Swinton Residents Association	General comments				General comments on the need to ensure that the designation and management of protected trees are made. Concerns are raised relating to the removal of trees due to poor management and a need to have a clear policy for designating Tree Preservation Orders.	The retention and planting of new trees is supported and encouraged by the SPD. The designation /creation of Tree Preservation Orders is provided under separate legislation which sets a clear framework.	No changes proposed.