

Appendix 1

Trees and Development Supplementary Planning Document Draft Consultation statement November 2021

Introduction

1. The Trees and Development Supplementary Planning Document (SPD) was published for six weeks public consultation between 9 June - 21 July 2021. This statement details the consultation on this document before and during this period. It sets out how it was undertaken and how the main issues raised in the consultation were addressed.
2. This statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Background on the Trees and Development Supplementary Planning Document

3. The Trees and Development SPD provides technical guidance on policy DM1 in the emerging Eastleigh Borough Local Plan (2016-2036) which sets the general criteria for new development in the borough. The SPD is a new guidance document and collates existing guidance in one document. It provides guidance on the approach to trees alongside new developments from the initial design of the proposal and preapplication discussions through construction and planting to the avoidance of future conflicts as trees mature.
4. The SPD is part of a suite of documents setting out the Council's approach to trees. The proposed Tree Strategy will provide the overarching framework including the vision for trees in the borough and key principles. The emerging Tree Policy sets out the approach to tree management for all trees under the Council's ownership or management.
5. The approach to trees within development sites was discussed at the Policy and Performance Scrutiny Panel meeting in September 2020. Since those discussions, the Eastleigh Borough Council Environment group has provided input over a series of meetings as the draft was developed between September 2020 and March 2021. The consultation draft was approved by Cabinet on 24 May 2021.

Public consultation on the draft SPD

6. The Council published the Trees and Development Supplementary Planning Document and the SEA/HRA screening statement for public consultation from Wednesday 9 June - Wednesday 21 July 2021.
7. Notification of this consultation was sent to everyone who had signed up to the Council's Local Plan email updates and individuals and organisations on Local Plan consultation database, about 1,800 emails and letters in total. These included statutory consultees, residents and developers.

8. The documents were available online via links on the Council webpage. Paper copies of these documents were also available to view at Eastleigh House, other Parish/Town Council Offices and libraries in the borough. Alongside the draft SPD and SEA/HRA screening statement, the Council produced a guidance note for the venue explaining the consultation and printed out hard copies of the response form.
9. The Council encouraged people to respond electronically using the consultation hub; <https://eastleighboroughcouncil.citizenspace.com>. A representation form was produced and representations were also accepted via email.
10. On 15th July, as part of the formal consultation the SPD was discussed at the Council's Policy and Performance Scrutiny Panel.

Responses received on the draft SPD

11. The Council received a total of 22 responses on the document as a result of the public consultation. Of these, 14 were from individuals, 5 from Councillors and parish councils and 3 from public or local authorities. All the responses were submitted electronically, either through the consultation hub or via email.
12. In addition to responses from the public consultation, the document was discussed at the Policy and Performance Scrutiny Panel and further internal comments were received.

Addressing the main issues raised

Summary of key issue	Council response and recommended changes
General comments	
<ul style="list-style-type: none"> • Comments on the importance of trees and their roles in mitigating climate change, reducing the risk of flooding and making better places to live 	Noted. No change required
<ul style="list-style-type: none"> • Support for the protection of trees and concerns about the loss of trees on specific sites 	Welcome support. No change required
<ul style="list-style-type: none"> • Questions about the protection of other habitats and hedgerows 	These comments go beyond the scope of the Trees and Development SPD. No change required
<ul style="list-style-type: none"> • Need to be clear about the scope of the guidance and clarify that it does not provide guidance on wider design principles 	Text added to clarify scope of document
Specific guidance and standards	
<ul style="list-style-type: none"> • Need for clear guidance for developers with numerical standards and best practice illustrations 	The SPD is a technical document setting out detailed policy requirements and includes illustrations of how trees can be designed in the highway

Summary of key issue	Council response and recommended changes
<ul style="list-style-type: none"> • Need to consider existing trees when designing new development 	Text added to the section on existing trees to specifically state that the Council expects existing trees are retained.
<ul style="list-style-type: none"> • Need to avoid future issues by considering the distance to other structures and the management of trees 	This is already standard practice and the SPD sets out guidance on this. No change required
<ul style="list-style-type: none"> • Suggestion that pre-emptive felling and site clearance should result in the refusal of planning permission 	This is beyond the powers of the Council. No change required
<ul style="list-style-type: none"> • Importance of planting to avoid crime and to not obscure or prevent natural surveillance 	Noted. However this is too restrictive and too specific. No change required
<ul style="list-style-type: none"> • Need for cross references to other technical guidance 	Agree. References added to guidance produced by the Council and others including Hampshire County Councils
<ul style="list-style-type: none"> • Concern that some of the highways design principles shown are not supported by the County Council and there is conflict between the SPD and County Council's technical guidance. 	The draft final SPD revises the highway layouts shown in Figures 1-4 and notes that they are illustrative layouts for wider design aspects
Implementation of SPD	
<ul style="list-style-type: none"> • Concern about lack of staff capacity to implement the measures in the SPD 	Noted. These comments go beyond the scope of the Trees and Development SPD. No change required
<ul style="list-style-type: none"> • Concern about enforcement and the penalties when people breach regulations 	Noted. These comments go beyond the scope of the Trees and Development SPD. No change required

Changes to the draft SPD

13. The changes made in the final draft version of the SPD include removing the option for a financial contribution instead of replacement trees, redrafting diagrams and minor wording changes for clarity.
14. In response to the detailed comments from Hampshire County Council as Highways Authority and as Flood Authority, the following changes were made:
 - a. Changes to the diagrams Figures 1 – 4 and their titles in response to comments by Hampshire County Council as Highways Authority about the wider design aspects shown (as opposed to layouts with regard to

- street trees) and internal comments. Addition of a note to state that the design aspects of these figures are illustrative (paragraph 36.1);
- b. Expanded text on SuDS features (Sustainable Drainage Systems) (paragraph 36.2.2) and about the potential of tree pit design to serve multiple purposes including storm water management (paragraph 44.2) in response to comments from Hampshire County Council as Flood Authority;
 - c. Reference added to Hampshire County Council's Highways Guidance Note 15 'Trees, Landscape and Ecology' (paragraphs 32.2, 11.2 and 36.7);
 - d. Specific mention of the various aspects development layouts should take account of including utilities and sightlines (paragraph 15.3)
15. Other changes were made as a result of other comments and further consideration by officers. These provide more information and clarification on the guidance in the SPD:
- a. More details provided on the information required by the Council and on engagement with service providers and specialists (paragraphs 11.1, 18.2 and 19.2);
 - b. Further clarification on discharging pre-commencement conditions and changes to approved plans (paragraphs 26.1 and 30.2)
 - c. Addition of cross references to the tree replacement policy (Appendix 1) and reference to the Biodiversity SPD;
 - d. Wording changes to clarify the role of trees and the urban forest (Part 2);
 - e. Additional wording to clarify that the guidance will be considered alongside other design guidance (Part 1);
 - f. Addition of text stating that the Council expects existing trees are retained (paragraph 13.4); and
 - g. Reference removed to alternative arrangements for a monetary payment for the provision of off-site replacement trees (Appendix 1, section 4);
16. The Council proposed updates to reflect recent changes to the National Planning Policy Framework (paragraphs 4.3 and 22.2) and further minor wording changes to remove any ambiguity, clarify terms and highlight positive actions (paragraphs 14.3, 17.1, 19.1, 23.1, 36.2.1-3, 36.3.1, 36.4.1, 40.2, Key points 3 and 4).
17. The final SPD has been prepared for publication. This version includes a contents page and photos were added to add the readability of the document and illustrate guidance. It has been designed to reflect the Local Plan style.

Appendix - Schedule of comments and EBC responses

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
Response 1 Public	Comment on climate change and sustainability; Other non-SPD related matters, including planning and green energy.	<p><i>1 mature 'native tree to be provided, on site or otherwise, for every 'single dwelling built in the borough.</i></p> <p><i>No construction within certain distance of established trees. To avoid future destruction by encroachment and more development extensions.</i></p> <p><i>New planting of trees to factor in 30-50 year growth and spread of roots and branches.</i></p>	<p>The SPD sets out detailed guidance to determine the appropriate level and type of tree planting within developments and addresses issues such as the impact of removing existing trees. This is based on diameter of tree removed which may require more than one tree as a replacement. Species selection is governed by multiple factors and it is problematic to use only native trees in light of climate change.</p> <p>This proposal is already standard guidance.</p> <p>This proposal is already standard practice.</p>	<p>No</p> <p>No</p> <p>No</p>
Response 2 Public	No requirement for SPD.	<i>My opinion that there is no need for further regulations about Trees The current situation gives more than adequate power to you tree officials...</i>	We believe that an SPD is required to clarify and detail the policies in the Local Plan.	No
Response 3 Public	Positive, supporting comment.	None.	Welcome support	No
Response 4 Public	Positive, supporting comment.	None.	Welcome support	No
Response 5	Comment on nuisance from trees.	No comments relevant to the SPD or its scope.	The SPD provides guidance to ensure that development is designed to consider both existing	No

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Public			and new trees and avoid future conflicts.	
Response 6 Public	Supportive of SPD with comments on new tree planting distances to structures, management and enforcement.	<p><i>A 7 metre gap between a medium sized tree and the building line represents a lot of space on both sides of the road, so I can see developers complaining about lack of profitability.</i></p> <p><i>trees in urban and suburban places do need management so that they don't damage structures or overwhelm living spaces and windows. There needs to be a protocol to allow management without lengthy planning applications</i></p> <p><i>there needs to be a system for protecting trees and ensuring developers fulfill their obligations.</i></p>	<p>Noted. Developers are advised to consider trees at an early stage and this should be one of the aspects considered when determining the capacity of sites.</p> <p>The SPD provides guidance to ensure that at the planning stage development is designed to consider both existing and new trees and avoid future conflicts. Issues around the management of Tree Preservation Orders are beyond the scope of this SPD.</p> <p>An enforcement system already exists but is resource limited. This issue goes beyond the scope of this SPD.</p>	<p>No</p> <p>No</p> <p>No</p>
Response 7 Public	Supportive of SPD with comments on species selection.	<p>In paragraph 40.2:</p> <p>1. Change "consider" to "show evidence of selecting".</p> <p>2. Change last sentence to "Choices of tree species must also demonstrate how provenance and biosecurity have influenced the sourcing of proposed tree stock."</p>	The final SPD has amended the wording and clarified this requirement. It now states that 'major development applications must demonstrate how provenance and biosecurity have influenced the sourcing of proposed tree stock'.	Yes
Response 8 Public	Comments on enforcement and penalties.	No comments relevant to the SPD or its scope.	An enforcement system exists but is resource limited. This issue goes beyond the scope of this SPD.	No
Response 9 Public	Comments on new tree planting distances to structures.	<i>I note that the building line is to be set 5+ metres from small trees. Appendix 3 lists such trees to be 6-11 metres in height. Some insurance companies will refuse to insure buildings that are within 7 metres</i>	Tree sizes in this document are defined by canopy volume not height. There are already huge numbers of trees in the UK at or closer than the 7m quoted. It is government policy that all streets should have trees but also that efficient use should be made of land.	No

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
		<i>of a tree higher than 3 metres. I suggest, therefore, that the 7+ metre building line should be regarded as the absolute minimum (unless the tree in question is containerised and meets the garden standard of 2 metres – see para 38.2).</i>	The balance in the SPD is considered correct.	
Response 10 Public	All 3 comments specific to former Police Station on Leigh Road	No comments relevant to the SPD or its scope.	-	No
Response 11 Public	14 comments on biodiversity, hedgerows, wildlife corridors, habitats, etc. (plus 2 points on RPAs). 1 comment on rainwater percolation.	<i>Item 15 must include a reference to the establishment and protection of the Root Protection Area as defined by the Woodland Trust particularly in regard to the design and construction of below ground works such as building foundations, drainage and road bases - see attached link. What is a Root Protection Area? - Woodland Trust. Item 15 must also be more specific on the need to provide buffer zones for the protection of existing trees and hedgerows. Item 17 must include specific reference to the establishment and protection of Root Protection Areas as defined by the Woodland Trust particularly in regard to the design and construction of below ground works such as building foundations, site drainage, and road bases. Item 43 should include a requirement for</i>	Root Protection Areas (RPAs) are mentioned throughout the document (see section 17) and are standard practice. Issues about below ground works are addressed in section 18. This SPD does not cover hedgerows. The final version of the SPD adds in a definition of RPAs – ‘the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree’s viability’. Root Protection Areas (RPAs) are mentioned throughout the document (see section 17) and are standard practice. Issues about below ground works are addressed in section 18. The SPD provides guidance on various aspects of	No Yes No No

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		<p><i>14.2 Pre-emptive site clearance will result in any subsequent planning application on the site, or any part of it, being rejected.</i></p> <p>[section 29] <i>If permissions are materially breached, permission should be revoked.</i></p> <p>[section 30] <i>Poisoned tree = post-hoc alteration of planning permission absolutely denied.</i></p> <p>[Key point 7] <i>Species selection for replacements: species should be locally native. Alternatively, species that are likely to migrate naturally northwards into Eastleigh as the climate warms. Exotics, planted for quick growth but suppressive of native vegetation of insignificant benefit to wildlife, (e.g. elaeagnus) should be strongly discouraged.</i></p>	<p>See above</p> <p>See above</p> <p>See above.</p> <p>Species selection is governed by multiple factors and it is problematic to use only native trees in light of climate change. Certain species would be discouraged, but the appropriate species would be a decision for the Landscape Architects.</p>	<p>No</p> <p>No</p> <p>No</p> <p>No</p>
Response 15 Hants. Constabulary	Comments on planting to avoid crime. Suggested changes and additions in relation to crime.	<p>[section 34] <i>We would ask that consideration is given to the inclusion of several paragraphs relating to the prevention of crime, disorder and the fear of crime within the SPD; worded as below or with words to convey the same meaning: "Good natural surveillance is one of the attributes of development that reduces the opportunities for crime and disorder. A</i></p>	<p>Whilst the general thrust of the comments is accepted there is far too much detail on this for an SDP about trees. It would be inappropriate to include phrases such as 'nor create a place within which a person might lie-in-wait unseen.' As this would completely preclude native shrub and tree structure planting critical to most major developments for ecological and play value.</p> <p>Overall, it is felt that these suggestions are too</p>	No

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		<p><i>carefully considered soft landscaping scheme provides for good natural surveillance of the public realm, reducing the opportunities for crime and disorder and reducing the fear of crime.</i></p> <p><i>“New features such as and footpaths etc. and public open space must be positioned so that natural surveillance is not obscured / prevented by the retained trees and soft landscape.”</i></p> <p><i>“New trees and soft landscaping should be positioned so as not to obscure / prevent the natural surveillance of the (proposed) public realm, nor create a place within which a person might lie-in-wait unseen.”</i></p> <p><i>To highlight the importance of preventing crime and disorder, we ask that consideration is given to a new “key point” relating to the prevention of crime and disorder, worded as below or with words to convey the same meaning: “Applicants must demonstrate that the landscape scheme contributes to the reduction of crime and disorder and the fear of crime.”</i></p>	<p>restrictive and too specific, being relevant to only certain situations. It is felt that post-planting management is more appropriate to this issue, such as crown lifting once trees become established</p>	
<p>Response 16 Bishopstoke Parish</p>	<p>Comments on issues at existing sites; staffing resources and liaison between tree officers and planning department.</p> <p>Comments on desire to see canopy</p>	<p><i>no mention of aftercare requirements in draft SPD</i></p> <p><i>[section 5] The “Urban Forest” proposal lacks credible detail, bringing into question the</i></p>	<p>Disagree, this is addressed in section 46.</p> <p>Section 5 provides information on the background for trees in the borough. The urban forest is not a new</p>	<p>No</p> <p>No</p>

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	<p>cover assessment.</p> <p>Comments relating to more cross-referencing.</p>	<p><i>extent to which it is really a Borough commitment.</i></p> <p><i>Whilst we welcome this initiative in principle, as set out this is little more than a concept lacking; a spatial plan, funding or programme for delivery.</i></p> <p><i>In addition there is no mention whether it is the Councils intention to retro plant within existing urban/suburban areas and how this will be achieved. To demonstrate the effectiveness of its strategy we would expect the Council to undertake an annual canopy survey and report this in its Annual Monitoring Report.</i></p> <p><i>Advice for developers should be more positive, with clear standards, process requirements and technical advice.</i></p> <p><i>The language needs to be strengthened stating clearly the Local Planning Authority's requirements for developers with clear numerical standards and best practice illustrations.</i></p> <ul style="list-style-type: none"> • <i>Requirement for Detailed Technical Advice which should include:</i> <ul style="list-style-type: none"> o <i>Tree protection measures during construction.</i> o <i>New planting requirements to achieve bio-diversity net gain, where this cannot be achieved through tree planting/retention alone factor in the other measures, e.g. green walls / roofs.</i> • <i>Aftercare requirements, advice and EBCs regime for enforcement and conditions monitoring and discharge.</i> 	<p>proposal but a term for the collection of trees within a city, or in this case, a borough.</p> <p>The SPD provides guidance about trees and new development. This suggestion is beyond the scope of the document.</p> <p>The SPD provides guidance on some of these elements such as tree protection measures. Where guidance is not included, this reflects the inability to create a policy that fits all circumstances, such as tree pit detail. It is not possible to provide detail for every eventuality and these elements will require technical input from officers.</p>	<p>No</p> <p>No</p>

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		<ul style="list-style-type: none"> • <i>Numerical standards/advice for planting distances from buildings, e.g. "Guideline distances from Development to Trees" Leeds City Council 2011</i> • <i>Trees and Sustainable Urban Drainage – not just in a highway setting</i> • <i>Tree pit detail for planting in urban areas, including staking and growing material content and volume. Membrane requirements for planting in brown field and potentially contaminated locations.</i> <p><i>Concerns raised are raised about a lack of staff capacity to effectively implement the tree retention, protection and management requirements set out in the draft SPD.</i></p> <p><i>To effectively manage tree issues set out within the draft SPD the Eastleigh Borough Council requires well trained and motivated staff with the capacity to be effective.</i></p> <p><i>In addition, as the Council is a major player in land acquisition and development e.g. urban extension at Horton Heath, can it be expected that Council Staff will be as rigorous when investigating their employers breaches of tree protection and protocols?</i></p>	<p>Agree, however this is beyond the scope of the SPD document.</p> <p>This SPD applies to all development, whether undertaken by the Council or private developers. Officers have, and will continue to treat EBC as they do other developers.</p>	<p>No</p> <p>No</p>
Response 17 HCC as	Positive, supporting comment. Supportive of pre-application advice	[section 10] <i>The County Council issued Technical Guidance Note 15 'Trees, Landscape and</i>	A link has been added to this guidance (paragraph 36.7).	Yes

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Highway Authority	<p>and promotion of their own, paid-for service.</p> <p>Comments on specific points, especially regarding highways and areas that contradict their own policies.</p>	<p><i>Ecology'(TG15) in November 2020.</i> https://documents.hants.gov.uk/transport/TG15-Trees-Landscape-and-Ecology.pdf <i>This document provides clarity for developers/applicants regarding the Highway Authority's position in connection with new and existing street tree provision and should be considered within the SPD and appended to the document.</i></p> <p>[section 36] <i>In terms of the technical guidance within the document there are a number of design principles promoted within the document which are not currently supported by the County Council for the purposes of highway adoption, in particular the use of permeable kerbs and rain gardens as a landscaping feature are not considered suitable from a maintenance perspective and this therefore presents conflict between the SPD and the County Council's technical guidance.</i></p> <p><i>More clarity is sought generally from the Borough Council regarding the materials proposed to ensure these are suitable for highway adoption.</i></p> <p><i>Whilst the Highway Authority support the boulevard approach suggested, it is essential that highway safety is not compromised and therefore street trees should be designed and planted outside</i></p>	<p>A note has been added to paragraph 36 that includes the text: 'The accompanying diagrams set out acceptable street layouts in terms of street trees: all other design aspects shown are illustrative. Current design advice from HCC should always be sought on land to be adopted as highway..'</p> <p>The SPD continues to refer to rain gardens as examples of SuDs. Please note that this guidance would also apply to unadopted roads.</p> <p>The note added to paragraph 36 also includes the text 'Whilst tree cover should be maximised, tree and soft landscape planting should be designed with due consideration to visibility splays and general highway safety'.</p>	<p>Yes</p> <p>No</p> <p>Yes</p>

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		<p><i>of the required visibility splays based on the design speed.</i></p> <p><i>Also, it is also not clear whether the figures within the document are for illustrative purposes, as currently the street layouts would not be supported by the Highway Authority and are contrary to guidance such as LTN1/20. For example, on Figure 2, cycling on carriageway for access streets within development sites would not be accepted and a segregated cycle route would be required for this street type.</i></p> <p><i>It is therefore requested by the local Highway Authority that a further review of the example street layouts is undertaken in order to accommodate not only street trees and landscaping features but all modes of transport too. This will ensure that developers/applicants are aware of the requirements to accommodate both trees and people and avoid later conflicts at the planning stage and ultimately proposed highway adoption.</i></p>	<p>The final SPD has amended the figures to address these concerns, for example Figure 2 now shows a segregated cycle route. A note has also been added to state that these street layouts are illustrative, see text above.</p> <p>Figures 1-4 provide illustrations of appropriate tree planting in the highway however the wider street layouts are illustrative only. Following these comments, the figures have been amended and a note added in the text at the end of paragraph 36.1.</p>	<p>Yes</p> <p>Yes</p>
<p>Response 18</p> <p>HCC as Flood Authority</p>	<p>Comments on potential additional wording and detail.</p>	<p>[section 5]</p> <p><i>Comments as Lead Local Flood Authority - The water management benefits of trees and tree planting are briefly mentioned in paragraph 5.3, though there are very few details. The County Council would suggest that some more details of the water management could be included, such as:</i></p> <ul style="list-style-type: none"> <i>• Evapotranspiration (in the tree canopy</i> 	<p>Section 5 provides a general overview of the benefits of trees and is not exhaustive. The Council has appointed consultants to produce a SuDS SPD that will address these issues. A cross reference to this SPD has been added to the document.</p>	<p>Yes</p>

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
		<p><i>section) comparative to canopy size trees can significantly reduce the amount of rainwater reaching the ground, therefore reducing surface water flooding</i></p> <ul style="list-style-type: none"> • <i>Tree roots draw water from the ground reducing groundwater levels and therefore reducing risk from groundwater flooding during the wet season</i> • <i>Tree cover increases infiltration of surface water flow and reduces the removal of topsoil during floods</i> • <i>Trees provide shade and urban cooling effects reducing drought during the hot season.</i> <p><i>In paragraph 44.1 – tree pits, the County Council notes that no reference is made to attenuating tree pits, which can be used in urban environments to increase water storage and reduce the risk of surface water flooding. The County Council would recommend that this reference should be made as part of this section.</i></p>	<p>The text in paragraph 44.2 has been amended to add in reference to the multiple purposes that tree pits can serve such as storm water management.</p>	<p>Yes</p>
<p>Response 19</p> <p>Fair Oak and Horton Heath Parish</p>	<p>Positive, supporting comments.</p>	<p>None.</p>	<p>Welcome support</p>	<p>No</p>
<p>Response 20</p> <p>Cllr Dave Kinloch</p>	<p>Comments on enforcement and standards for arboriculturists</p>	<p><i>Tree protections are not enforced to the full extent of the law including potentials to fine etc. What if there is a failure to replace the trees? What action will be taken?</i></p>	<p>These comments go beyond the scope of this SPD but these issues will be considering in the emerging Enforcement SPD.</p>	<p>No</p>

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		<i>Is there a minimum standard for a arboriculturalist that the council would accept? Is there a professional body that stipulates a minimum level of education and expected standards?</i>	In terms of education and experience, there is no minimum standards. While we are supportive of a qualification's framework and chartership, if the information is sound, then qualifications are irrelevant.	No
Response 21 Cllr Derek Pretty	Supporting comments	None	Welcome support	No
Response 22 Cllr Cynthia Garton	Comments on role of trees, proximity to buildings and tree mortality Supporting comments	<i>A development should be planned around the trees, not the other way round.</i> <i>In the section "space for Trees" it mentions the proximity of trees to buildings, which I believe is very important. Buildings should not be placed so close to trees that they cause a problem further down the line.</i> <i>The statements in the SPD (on tree mortality), but it can only work if those statements are enforced with regular inspections and site meetings.</i> <i>Tree lined streets are a brilliant idea, as it gives character and makes the area a nicer place to live.</i>	Agree. The SPD provides guidance on existing trees before considering new trees and the retention of existing trees is a central theme. Welcome support Note comment. Enforcement is beyond the scope of the SPD. Welcome support	No No No No