

Wandsworth Trees & Development Supplementary Planning Document (SPD)

Consultation Report

December 2025

About the consultation:

The Trees and Development SPD provides borough-wide guidance on how development should take account of existing trees and new planting. It supports the policies set out in the [Wandsworth Local Plan](#) (July 2023), in particular Policy LP56 Tree Management and Landscaping. This is a new SPD.

A four week public consultation ran from Tuesday 2 September to Tuesday 30 September 2025.

Representations could be made by any persons:

- via the online consultation platform
- By email to planningpolicy@wandsworth.gov.uk
- By post to Spatial Planning & Design, Wandsworth Council, Wandsworth High Street, London, SW18 2PU

A response form was provided.

Who was consulted?

Letters and emails were sent to both statutory and non-statutory consultees on the Council's Local Plan database which consists of individuals and organisations who are either prescribed bodies for the purpose of consultation or had requested to be notified of consultations on local development documents. These letters and emails gave notification of the consultation and the consultation period; how to access the document; how to make a representation; and contact details to find out further information.

Paper copies were made available, together with paper response forms, in the borough's main libraires (Balham, Battersea, Putney, Roehampton, Tooting and Wandsworth) and the Town Hall Reception. Information was given to library staff and the Town Hall Reception regarding the consultation and who to contact for further information.

Details of the consultation was posted on the Council's [Planning Policy Consultation](#) webpage and on the Council's Consultation Engagement Hub ([Citizen Space](#))

Summary of Response to the consultation:

A total of 11 responses were received from eleven people/organisations. Summaries of the responses, the Council's response and any amendments made to the final document are shown in the Appendix.

Overall:

- Six consultees gave general support for the document or made general comments;
- Two consultees acknowledged the consultation and review of the SPD, but had no comments to make
- Three consultees made specific comments

The key points raised were:

- Support for consideration of flood risk in relation to new tree planting with a suggestion for the addition of more detailed guidance
- Support for consideration of trees in relation to historic environment with a suggestion that additional mention is made of consideration of below-ground archaeological sites
- Support for the 'right tree, right place, right reasons' approach
- Support for retention of tree retention over removal and replacement, with suggestions that this advice is:
 - provided to applicants at the earliest stages of the planning process
 - repeated earlier in the SPD
- Support for encouragement of planting of native species
- Support the requirement to record ancient, notable and veteran trees in the trees survey with a suggestion that this be repeated throughout the SPD
- Concern about impact of future amendments to relevant British Standards and the impact this could have on the SPD's content and longevity
- Concern that the SPD does not promote criteria for retaining trees beyond their amenity value
- Questions relating to the development management process, including:
 - the possibility of carrying out reviews of landscaping details following completion of a development and beyond
 - concern about obligations and enforcement in relation to future and ongoing maintenance and watering of new trees
- A comment that applicants should use a qualified arboriculturist to undertake tree surveys
- A suggestion to mention trees' value of enhancing the streetscape as part of Urban Greening
- The need for new tree planting to take account of the public sewerage system and water supply infrastructure
- A suggestion to include importance of biosecurity in the SPD
- Criticism that the SPD is too long, repetitive and could be clearer in its structure

Trees and Development Supplementary Planning Document

Appendix 1: Schedule of Consultation responses, Council comments and changes made.

This document summaries all responses received to the consultation on the draft *Trees and Development SPD*, the Council's response and any changes made to the final SPD as a result.

Note that comments / submissions from respondents are included in the table in the form in which they were written. They are not alphabetically ordered or in any other order of priority.

Consultee ID	Name / Organisation
E1	Clare Graham (Open Spaces Committee, Battersea Society)
E2	Environment Agency
E3	James Preece (Historic England)
E4	J Aliband
E5	Leonie Noble
E6	Samantha Rose (National Highways)
E7	Sharon Jenkins (Natural England)
E8	David Wilson (Thames Water)
E9	Vickesh Rathod (DPDS Ltd, on behalf of Stuart Gulliver)
E10	Bridget Fox (Woodland Trust)
E11	Battersea Society Planning Committee

Consultee name	Organisation details	ID	Comments	Council response	Changes made to the final version of the SPD
Trees & Development Supplementary Planning Document					
Clare Graham	Open Spaces Committee, Battersea Society	E1	<p>This response comes to you from the Open Spaces Committee of the Battersea Society; we understand that our colleagues on the Planning Committee will also be sending in their own response.</p> <p>OSC exists to protect, promote and help improve Battersea's open spaces, and the connections between them. We also hold the watching brief for Battersea's street trees, Thames Path and natural resources generally. Increasingly too therefore we are engaging with wider green issues – biodiversity enhancement, climate change mitigation, and environmental sustainability.</p> <p>Our response is about all three SPDs in general, with some specific points. Clearly there is much common ground, especially with Biodiversity and Trees. We understand that the SPDs are intended to add to existing policies, not to write new ones. However in a rapidly changing world SPDs also help to serve to show where the Council needs to update policy and</p>	<p>Noted. This comment relates more to development management practice at planning stage, though the Trees & Development SPD does set out guidance on when a Construction Management Plan (CMP) will need to be submitted, and that it must support the tree protection details in the Tree Protection Plan (TPP) and Arboricultural Method Statement</p>	None.

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			<p>practice to meet its sustainability aspirations.</p> <p>Biodiversity SPD (comments relevant to the Trees & Development SPD only)</p> <p>Other measures the Council might review are:</p> <p>(ii) Employing Construction Management Plans more frequently, including an assessment of the use of large vehicles and damage to street trees. Street trees are often damaged during building works and the erection/removal of scaffolding. Street trees could be inspected before and after construction work.</p> <p>Trees SPD It is disappointing that this does not promote criteria for retaining trees beyond amenity value and visual impact on the surroundings, by taking into account biodiversity value, carbon capture and their age, evaluating how long it would take to satisfactorily replace them – i.e. a stronger presumption in respect of retention. Again, we appreciate that</p>	<p>(AMS). This would also apply to street trees, where relevant.</p> <p>Local Plan Policy L56 Part C.1 states that the Council will “resist development that would result in the damage or loss of trees, including veteran trees and trees considered to be worthy of townscape or amenity value...” Whilst the SPD identifies the many benefits of trees, including their biodiversity and climate resilience value, Local Plan Policy relating to retention of trees considers their amenity value only. As stated in the introduction of the SPD, it is not possible to introduce new policies in an SPD. However, when a planning application is considered in the round, other Local Plan policies will come into play, including, where relevant, Policy LP55 Biodiversity, which sets out BNG requirements under the Environment Act. Any loss of tree of therefore, would be assessed against other relevant policies in the Local Plan as part of the overall consideration of a planning application, and not just assessed according to its amenity value.</p>	<p>None.</p> <p>Additional sentence in Section 8: New Tree Planting to read: “<i>The Council may</i></p>

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			<p>his (sic) approach might need a change in policy.</p> <p>On a broader point about practice on major schemes with significant amounts of planting: might it be possible to carry out reviews of landscaping details as developments mature? These could assess whether replacement planting was needed and consider whether TPOs might be appropriate to safeguard the landscaping in the longer term. Funding for this might perhaps be covered as part of a Planning Performance Agreement. (Empasis original)</p>	<p>The SPD includes information on maintenance and aftercare, and advises that submission of details may be needed to be submitted to the Council for approval post-completion. An additional sentence has been added to reference the Council's ability to impose TPOs, where appropriate.</p>	<p><i>seek the long-term protection of trees through the designation of Tree Protection Orders (TPOs)."</i></p>
n/a	Environment Agency	E2	<p>Thank you for consulting us on the above supplementary planning documents on 02 September 2025.</p> <p>We hope that this is a collaborative process leads (sic) to guidance that expands on the existing Local Plan, and helps deliver sustainable development, contributes to a stronger economy, and safeguards the environment for future generations.</p> <p><u>Trees and Development SPD</u></p>		

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			<p>In Section 6, we welcome the consideration of flood risk in relation to new tree planting proposals. While tree planting can help mitigate flood risk by intercepting rainwater, we recommend that specific guidance be provide on the potential hazards of planting near riverbanks and flood defences. Trees in close proximity to these structures may cause damage and compromise their integrity. Trees planted too close to riverbanks may destabilize the soil, increasing the risk of bank collapse and erosion for example. In addition, we usually recommend sufficient setback from any proposed development from flood defences. The placement of new trees and associated landscaping should also ensure they provide a suitable offset from any flood defence. The offset is required for the current and future flood management of the asset which is further explained within the Local Plan and Strategic Flood Risk Assessment.</p>	Noted. Additional text has been added to Section 8: New Tree Planting.	<p>Additional text added to Section 8: New Tree Planting to read:</p> <p><i>‘With regards to new tree planting near riverbanks, new trees should be sufficiently set back to reduce the risk of bank collapse and erosion. The placement of new trees and associated landscaping should also ensure they provide a suitable offset from any flood defence. This is required for the current and future flood management of the asset, as set out in Local Plan Policy LP12 Water and Flooding Part J, and the Strategic Flood Risk Assessment.’</i></p>
James Preece	Historic England	E3	Thank you for the opportunity to comment on the above consultation document. As the Government’s		

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			<p>advisor on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.</p> <p>We have reviewed the draft Supplementary Planning Document and welcome the fact that consideration of the historic environment is well integrated. This includes recognition of the positive contribution trees can make to the character and conservation areas and the significance of listed buildings (para 1.11). The document also sets out additional protections afforded to trees within conservation areas, the legal basis for that additional protection and the process for notifying the Council of any proposed works (paras 1.15, 4.44-4.47).</p> <p>The SPD references the ‘right tree, right place, right reasons’ guidance, that sets out that new tree planting must ensure the historic environment is protected or enhanced when new trees are planted (para 6.6). This will require</p>	<p>Support noted.</p> <p>Support noted. Additional text has been added to reflect that consideration of the historic environment also includes below-ground archaeological sites.</p>	<p>Additional text added to the ‘Right Tree, Right Place, for the Right Reasons’ subheading in Section 8 ‘New Tree Planting’ to now read (new text underlined):</p>

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			consideration of historic environment setting issues in future tree planting proposals to ensure that heritage assets (both designated and non-designated heritage assets) and their settings are appropriately conserved and enhanced. Tree planting can cause a risk to archaeological sites. We would welcome some text in the SPD that sets out that consideration of impacts on the historical environment should also include consideration on the impact of below ground archaeological sites.		<i>'Historic environment: ensure the site's historic environment is protected or even enhanced with new trees; this should also include consideration of below-ground archaeological sites.'</i>
J Aliband	n/a	E4	<p>I'm pleased that Wandsworth is taking steps to plant new trees and is considering the "right tree, right place" approach. I've noticed new plantings in areas like Coronation Gardens and the green triangles on West Hill Road. However, many of these trees are failing to thrive, with up to 50% dying – likely due to a lack of watering before, hot, dry weather sets in and new trees have not had time to develop their root systems.</p> <p>Newly planted trees dying from lack of water is a waste of resources and could easily be prevented with a</p>	Support noted. The SPD states that aftercare and management should form part of a development's landscaping and maintenance plan, including watering of trees, and that adherence to the approved details, as part of any planning permission, will be secured via condition. The SPD also sets out that planning conditions or obligations may be used to secure the replacement/replanting of any new trees that die within a reasonable period of their planting.	None.

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			proper watering plan. I would therefore like to see the inclusion in the Planning Document of a follow-up watering strategy in the tree planting programme, clearly outlining who is responsible, when watering will take place, and the quality of water to be used.		
Leonie Noble	n/a	E5	<p>Generally all the points made are good and I support them fully, except:</p> <p>In the Arboricultural Advice section references to BS3837:2012 refers to “any updated versions”. There IS an updated version: 2025 due to be published this year and should be the one to be references rather than left to the Arboricultural Consultants to carry on with the old one.</p> <p>Also Applicants should always use a suitably qualified arboriculturist to carry out the tree surveys.</p> <p>7.0 Trees and Retrofitting Re “Urban Greening” the list of advantages of adding trees is all good but omits to mention the value of enhancing the streetscape. This is</p>	<p>Support noted.</p> <p>The SPD makes clear that at the time of writing, the current British Standards are under review. Consultation on amended guidance closed October 2024, and there has been no date for publication announced since then. It is therefore not currently known when the new guidance will be published, though the SPD makes clear that applicants are advised to ensure they consult the most recent version. Furthermore, it is not considered that the proposed amendments as per the consultation – if published – would impact on the contents of the SPD to render it out-of-date.</p> <p>The SPD makes clear that it is important that a suitably qualified</p>	<p>None.</p> <p>None.</p>

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			also an important factor please can it be added.	<p>arboriculturist in engaged throughout the development process. With regards to Tree Surveys, the SPD states that these must be in line with BS; the BS makes this requirement explicitly clear (Section 4.2.2 of BS 5837: “The survey must be undertaken by an arboriculturist who is competent to do so”).</p> <p>Support noted for the listed advantaged of consideration of trees in retrofitting projects. The contribution of trees to improving the visual amenities of the streetscene is noted elsewhere in the SPD, and it is not considered relevant to the ‘Retrofitting’ section, which focuses on climate and biodiversity goals.</p>	None.
Samantha Rose	National Highways (Operations Directorate – South East)	E6	Thank you for your email received on 2 nd September 2025 regarding the public consultation on supplementary planning documents, specifically (1) Biodiversity SPD, (2) Planning Obligations SPD and (3) Trees and Development SPD. The SPDs support the policies of the Wandsworth Local Plan (2023).	Noted.	None.

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			<p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operated and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. National Highways are interested as to there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of proposed developments.</p> <p>We understand each of the three SPDs has been prepared to provide further guidance for how planning applicants should address certain issues when seeking planning permission. We have no comments on the three documents. We will continue to discharge our statutory consultee responsibilities and will work collaboratively with the Council and planning applicants to</p>		

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			manage development and ensure the effective operation of the SRN.		
Sharon Jenkins	Natural England	E7	<p>Thank you for your consultation on the above dated and received by Natural England on 2nd September 2025.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p>	Noted.	None.

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			<p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	<p>Noted. The SPD does not meet the threshold to require a Strategic Environmental Assessment or Habitats Regulations Assessment.</p>	
David Wilson	Thames Water	E8	<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.</p>	<p>Support noted. The SPD advises on the need for an Arboricultural Impact Assessment (AIA), which sets out the below- and above-ground constraints</p>	<p>None.</p>

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			<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Wandsworth Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments:</p> <p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the planting of trees and shrubs must take account of the existing public sewerage system and water supply infrastructure so as not to cause damage from tree roots. In order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of sewers or water pipes.</p>	<p>on site, to guide the layout of the development proposal. The SPD makes clear that the AIA must be in line with the British Standard (BS) 5837:2012 (or any updated version since adoption of the SPD). The BS requires that below-ground services, such as public sewerage systems and water supply infrastructure are identified and considered within the AIA.</p>	
Vickesh Rathod	DPDS Ltd part of DPDS Consulting Group, on behalf of Stuart Gulliver	E9	DPDS Consulting Group [‘DPDS’] has been instructed by Mr Stuart Gulliver [‘the client’] to prepare and submit written representations to Wandsworth Borough Council’s draft ‘Planning Obligations’, ‘Biodiversity’ and ‘Trees’ Supplementary Planning	Noted.	None.

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			<p>Documents (SPDs) which were published for consultation on 2nd September 2025.</p> <p>The client owns a property at Albion Riverside and has a particular interest in any emerging development proposals (particularly for tall buildings) in the riverside location around Battersea Bridge, as any development here is likely to have an impact on the future amenity of his property.</p> <p>On behalf of the client, DPDS has previously submitted representations during the development of the Wandsworth Local Plan 2023-2038 at the Regulation 19 and Main Modifications consultation stages and attended relevant Local Plan Examination hearing sessions. SPDS has also prepared and submitted a number of detailed objections to the recent planning application (re. 2024/1322) for demolition of an existing office building and erection of a 28-storey residential-led development at 1 Battersea Bridge Road, which was refused in June 2025.</p>		

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			<p>DPDS wishes to make the following comments on the three draft SPDs on behalf of our client.</p> <p>Trees SPD</p> <p>We welcome the intent of this SPD in making clear the Council's requirements and expectations in relation to any proposed development with existing trees on or near to the site, including householder applications, and in relation to new planting required as part of a proposed development.</p> <p>We support the objective that <i>"The Council strongly favours tree retention over tree removal and replacement. Consideration of trees is encouraged at the early stages of design of any new development, and applicants are expected to consider retaining existing trees and incorporating them into new development proposals. Where existing trees are removed, they should be replaced as part of the development"</i>.</p> <p>We strongly encourage that this is objective (sic) is relayed to</p>	<p>Support noted.</p> <p>Support noted.</p> <p>Noted. The SPD emphasises the merits and importance of applicants</p>	

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			<p>developers at the earliest stages of the planning process (such as the pre-application stage), so schemes can be carefully designed to incorporate existing trees and/or make provision for replacement trees.</p> <p>Concluding Remarks We trust that the comments and suggestions set out in this letter of representation will be given full consideration in the finalisation of the three SPDs concerning Planning Obligations, Biodiversity and Trees. These SPDs will play a key role in supporting local and national policy objectives to achieve sustainable development through balancing economic, social and environmental requirements, so it is important that the SPDs take the opportunity to clearly communicate what is expected from applicants/developers to achieve these objectives.</p>	<p>seeking pre-application advice to ensure all relevant matters relating to trees and development are considered early on in the design process.</p> <p>Noted.</p>	
Bridget Fox	Woodland Trust	E10	<p>Feedback by section or paragraph</p> <p>5.8 Strongly support this paragraph, prioritising retention of existing</p>	Support noted. Whilst the SPD references the Council's preference for retention of existing trees as the starting point for any planning application, throughout the SPD, an	None.

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			<p>trees, resisting loss or harm to trees and setting standards for new tree planting: we suggest it could be repeated earlier in the document, as the framing approach to the SPD.</p> <p>6.1.1 We support the policy in the Wandsworth Local Plan that encourages the planting of native species. While some variety of species in urban/street settings is acceptable, in general native species should still be prioritised given their landscape and biodiversity value. There is evidence that native species can adapt to a changing climate (phenoplasticity) and should be given that opportunity. Where non-native species are planted, these should ideally be a genus related to native species to give some habitat continuity, rather than a wholly exotic introduction.</p> <p>“The Wandsworth Local Plan encourages the planting of native species, and these should be the first choice for new planting. However due to the impact of climate change in London, some</p>	<p>additional sentence has been added to the introductory section, to reinforce this approach.</p> <p>Support for the Local Plan approach noted. Local Plan Policy LP56 encourages the planting of native species, whilst noting that native species might not always be appropriate due to the impact of climate change in London. The policy therefore allows for a degree of flexibility in the choice of tree, to be considered on a case-by-case basis to allow for an assessment of the specifics of the site and its surroundings, whilst also encouraging native species where appropriate. It is considered that this approach is reflected in the SPD, which also references the Royal Botanical Gardens Kew publication, ‘Planting for the Future: Kew’s Landscape Succession Plan’, which identifies that up to half of existing tree stocks may be vulnerable to projected climate conditions by 2090, and whose research points to the importance of selecting tree species which demonstrate climate resilience, diversifying beyond traditional native species.</p>	<p>None.</p> <p>None.</p>

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			<p>native species are not always appropriate, and compatible non-native species will also be acceptable.”</p> <p>4.1 Welcome the requirement to record any ancient, notable and veteran trees as part of the trees survey. The SPD notes that national planning policy requires protection of ancient and veteran trees. It would be good to have this requirement to protect made explicit throughout the SPD, whenever ancient & veteran trees are mentioned.</p> <p>Record any ancient, notable and veteran trees, and the proposals for their protection including Root Protection Areas.</p> <p>6 New Tree Planting The SPD is silent on biosecurity. Whether native or non-native species are selected, it is vital that they are sourced securely to reduce risk of importing pests or diseases. Around £12bn of plants and plant commodities come into the UK each year, and rising imports have coincided with 267 non-native plant</p>	<p>Support noted. The SPD makes clear the national legislation and policy relating to ancient and veteran trees.</p> <p>Noted. The suggested text has been added to the SPD.</p>	<p>Additional text added to Section 8: New Tree Planting to read: <i>‘In sourcing tree stock it is vital that biosecurity is maintained and the risk of importing tree pests and diseases is minimised. The Council will</i></p>

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			<p>pests arriving and establishing themselves here. Ash dieback alone could kill 80% of UK ash trees at a predicted economic cost of £15bn. Another 127 active pests and diseases are considered high risk to the UK.</p> <p>We therefore recommend specifying, or at least setting a preference for, UK & Ireland sourced & grown (UKISG) tree stock. Local sourcing has other benefits beyond biosecurity; it reduces the carbon footprint of the supply chain and supports the green economy.</p> <p>Add a new point under 6.6 Biosecurity: ensure all planting stock is procured in line with biosecurity standards, free of pests and diseases and ideally from local or UK grown sources. AND/OR add new para 6.12 In sourcing tree stock it is vital that biosecurity is maintained and the risk of importing tree pests and diseases is minimised. The Council will encourage the use of UK & Ireland Sourced and Grown tree stock where possible and the specifying of Plant Healthy</p>		<p><i>encourage the use of UK and Ireland sourced and grown tree stock where possible and the specifying of Plant Healthy standards and/or appropriate quarantine for any imported planting stock.'</i></p>

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			standards and/or appropriate quarantine for any imported planting stock.		
n/a	Battersea Society Planning Committee	E11	<p>Our colleagues in the Open Spaces Committee have responded in detail but we wanted to add a concern about the way the SPD is drafted. The document is intended for for (sic) both professionals and householders, and it needs to be much clearer to ensure that policy is understood and complied with. But the draft is hopelessly poorly structured; it is hugely repetitive, and the attempt to structure the bulk of the document into the Pre-Application and Application Stages simply doesn't work.</p> <p>A flow chart of things to be done in the pre-app stage includes things to be done in the application, the construction and the post-construction stages. Tree surveys, topographical surveys, Arboricultural Impact Assessments and Management Plans get covered in several places. Householder applications get a bare mention in the General Guidance and then are dealt with under Application Stage.</p>	<p>The issues regarding structure, clarity, and audience have been carefully considered and have informed a redrafting of the SPD. The SPD has been restructured to reduce repetition and to present a clear, logical flow from design to delivery. Householder advice is now integrated throughout the document, rather than presented as a standalone section.</p> <p>Where points are repeated, this is in response to feedback from internal colleagues that important matters for consideration and/or arboricultural documents are frequently overlooked/omitted during the planning process, which leads to delays. Whilst officers would encourage users of the SPD to read the whole document, it is recognised that – in reality – applicants might only refer to sections they deem relevant to them. It was therefore considered important that certain pertinent points are repeated in order</p>	<p>New sub-section in the Introduction clearly setting out who the SPD is for.</p> <p>New section titled 'Considering Trees Early' inserted before the Pre-Application and Planning Application Stage chapters. This does not introduce new information, but takes information about the importance of considering trees early in the design process, to reduce the length and repetition of other sections and to improve overall flow and readability.</p> <p>A new standalone section titled 'Technical Guidance on Key Documents' has been inserted. This contains information on the detail required for each arboricultural document and how they relate to one</p>

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			<p>A section on Legal Context is followed by a separate one later on TPOs and then another one as an Appendix (with no cross references).</p> <p>We also note that the draft is substantially based around the application of British Standards, many of which are due to be revised, which will affect the longevity of the document. We suggest that it should be substantially re-written, and shortened, before it can become acceptable.</p>	<p>to ensure that they are sufficiently captured for each individual reader.</p> <p>The SPD makes clear that at the time of writing, the current British Standards are under review. Consultation on amended guidance closed October 2024, and there has been no date for publication announced since then. It is therefore not currently known when the new guidance will be published, though the SPD makes clear that applicants are advised to ensure they consult the most recent version.</p> <p>Furthermore, it is not considered that the proposed amendments as per the consultation – if published – would impact on the contents of the SPD to render it out-of-date.</p>	<p>another in the planning process. There is no new information compared with the Consultation version SPD; rather, it takes information previously presented in the Pre-Application and Application Stage sections, to reduce repetition between the two sections and make the document more user-friendly.</p> <p>Householder advice is no longer presented as a standalone section. The advice is integrated throughout the SPD and indicated by a 🏠 icon.</p> <p>The Pre-Application Section has been restructured so that it can read as a standalone section whilst also removing some of the technical information which is now presented in the new 'Technical Guidance on Key Documents' section, to reduce repetition.</p>

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					<p>The flow-diagram showing summarising the keys stages when trees should be considered during the development process has been simplified, to make the visual aid more user-friendly, with the more detailed information transferred to the relevant sections of within the main body of the SPD. It has been moved from the main body of the SPD and included as an appendix, which is considered more of a logical home given that it is a reference tool.</p> <p>Text has been amended throughout the SPD following an internal review, with the aim of reducing the length of the SPD and improving readability. However, it is important to note that no information has been included as a result of this review.</p>