

# DESIGN AND PLACEMAKING PLANNING PRACTICE GUIDANCE CONSULTATION 2026

## A written response from the Trees and Design Action Group



The Trees and Design Action Group (TDAG) was founded in 2007 as a not for profit and apolitical collaborative forum to promote best practice in the planning, planting and management of urban trees. TDAG was incorporated as a charitable trust in 2013.

The TDAG model was at the time of creation, and remains today, a unique and effective world leading model.

The group shares the collective vision that the location of trees, and all the benefits they bring, can be secured for future generations through strong collaboration in the planning, design, construction and management of our urban infrastructure and spaces.

The uniqueness of TDAG is that, as an organization, it crosses the boundaries associated with professional disciplines engaging with a wide range of professionals who have an interest in trees and the built environment. They include leading built environment practitioners and developers as well as organisations such as the Forestry Commission, the Woodland Trust, the Tree Council and the Community Forests. No other built environment organization in the UK provides such an effective forum or communicates with such a wide range of disciplines.

The key strength of TDAG is that those taking part in TDAG's work can do so in TDAG's name i.e., a neutral organisation with no commercial agenda influencing its guidance, proposals or actions.

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### **TDAG COMMENTS ON THE DPPPG CONSULTATION WITH PARTICULAR REFERENCE TO TREES**

#### **General comments**

- It is very useful to combine the previous combination of documents into one document.
- The overall layout is good and accessible. All seven features are well defined, and all are equally important. It would be useful to have a diagram (more than the 'wheel') to show how each element is integrated with the others and how it could be represented in 'a well-designed place.'

- The is serious concern about local authority resources to provide Design codes/guides etc.? Do they have the skilled staff and the financial resources to do this? Are there provisions for less well-endowed authorities, for example?
- With an 'architect's' rather than a 'tree' hat on, may I make a plea that all terrace house roof lines are not presented with valley gutters. While they are currently fashionable, they have the potential for maintenance issues. Can you also show that terraces do commonly have continuous roof lines?
- Design Codes – we are cautious about design codes even if bespoke for local use as they can be too prescriptive and overlook the value of a good design brief.

### **Comments on drawing illustrations and photographic images**

This is always difficult as a picture may be “worth a thousand words” but only if it delivers the right message – so it can be a positive, but also a negative.

- A positive image: the front cover – it is useful to show trees in locations where they can deliver particular benefits – such as the space between back gardens where there is room for large trees and canopy spread as well as offering shade which will be increasingly desirable with the emerging impacts of climate change. But there will need to be encouragement to private owners of trees, whose trees contribute significantly to the overall urban forest and tree canopy cover to retain and protect trees on their land.
- A negative image: P14 Fig 3 – The illustration shows the removal of a back garden rather than the repurposing of underused land. The drawing could be amended to illustrate where built infill is really suitable?
- All the photographs need a caption, beyond the location, to explain what point they are making and relevance to the text.

### **Comments on each section**

#### **Livability**

- P13 para 27 please add: **To this end it is essential that landscape is fully integrated from the beginning of the design for all schemes.** This is important as too often the spaces between buildings come in at too late a stage!
- P14 – please add a further bullet between the third and fourth ones: **providing spaces such as allotments and community orchards for local communities to grow their own food.** This is important as it is part of the value of food and the educational benefits for young children and the community generally.

#### **Climate**

- This section focuses on elements of design to adapt and mitigate climate issues, but while the introduction includes the need 'to increase green infrastructure provision', the rest of the chapter seems to omit the role of trees and GI including the importance of SuDS, tree canopy cover etc – all part of minimising climate risks. The illustration of page 26 includes trees etc...but the benefits should be briefly touched even if an apparent repetition of what is said elsewhere in the guidance (as per the illustration on page 33)

- Understanding built form and its impact on increasing climate related issues such as increased urban heat will be vital along with the role of trees for adaptation and mitigation. Emphasising the value of 'shade' in the spaces between buildings is vital as this can both protect the (low rise) buildings (housing) from over-heating and also the external spaces from the impact of glare etc from the buildings. It is also important for shading active travel routes for (pedal) cycling and walking. The illustration on Page 19 (on livability) is useful for making the point.

### Nature

- P28 Fig 15 - green infrastructure – how to achieve cross boundary connectivity in practice in line with the NE GI Framework? Examples?
- P31 - does there not need to be a cautionary note about the dangers of grey squirrels and foxes?
- P 32: Urban Trees – please add to "incorporating a variety of appropriate tree species to support biodiversity, build biosecurity **and climate change resilience.**
- P32 – Please amend **Required a 5-year establishment period for newly planted trees and ensure** the long-term maintenance **aftercare** of newly planted trees through appropriate measures, such as establishing root protection areas and using biosecure planting to avoid the introduction of pests. [As per the debate in Parliament on 15.01.2026 – calling for 3-5 year establishment period. BS 8545 calls for 5 years – <https://hansard.parliament.uk/commons/2026-01-15/debates/DAC9B99B-CD6D-478E-92C5-B7E1E1A2AB83/web/>]
- There is no mention of the 3-30-300 principle for healthier, green cities which is gaining interest in local planning authorities. <https://nbsi.eu/330300-principle/>

### Movement

- P 39 para 102 – user hierarchy. Where do we put e-bikes and scooters as they are not compatible with pedestrians (and neither are speedy cyclists) – we understand that this is an issue the new MfS is grappling with.
- In the light of the increasing impacts of climate change, should the guidance call for walking and cycling routes in new developments to have tree canopy cover?

### Built Form

- P41 - no comment is made about the impact of built form and local microclimates and climate related risks in urban development – as per comment above about 'shade'. (This should also be reflected in the NPPF)

### Part 2 Design Quality in the planning process

- P62 Resource bullet 3 – please insert **for most schemes this must** include urban design etc. in place of this can 'this can include urban design' etc. It is essential that the landscape architect and arboriculturist are brought in right from the start as part of the evidence gathering.
- P65 POE - Should there not be an expectation that the planning department will verify that what has been built and planted was what had been approved and enforced; similarly building control will verify the performance of the buildings.

- P68 para 210 insert including site sections into adjacent sites: 'Diagrams at the area and site specific scales **including site sections into adjacent sites** can provide clear spatial context for development and how it relates to the wider local plan spatial strategy.

Appendix B Other references – please add:

- 'New Neighbourhoods in Cambridge' <https://tinyurl.com/New-Neighbourhoods>
- Trees in the Townscape: A Guide for Decision Makers. Trees and Design Action Group 2010 <https://www.tdag.org.uk/trees-in-the-townscape.html>
- Trees Planning and Development – A Guide for Delivery. Section One: Creating financial, environmental and social value into the future. Trees and Design Action Group 2023 <https://www.tdag.org.uk/trees-planning-and-development.html>
- Trees Planning and Development- A Guide for Delivery Section Two: Planning the urban forest: how to develop a strategy that delivers. Trees and Design Action Group 2023  
<https://www.tdag.org.uk/trees-planning-and-development.html>

### **Disseminating the Guidance – An offer from the Trees and Design Action Group**

Once the final guidance has been produced, we would be happy to help disseminate it through our online seminars. We have one penciled in for October 2026.

### **SUPPORT FOR OTHER SUBMISSIONS**

The Trees and Design Action Group supports the response submitted by the Edge.

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