

National Planning Policy Framework Consultation 2024

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>



About 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. Details of our work and free online best practice guidance, seminars and tree-related research can be found here: www.tdag.org.uk

TDAG RESPONSE TO NPPF CONSULTATION

General comments

TDAG considers that development decisions should be guided by a Comprehensive National Land Use Framework in line with the Edge proposal put forward to the Cabinet Office in September. Details are here: <https://edgedebate.com/edge-events/edge-roundtable-173-delivering-a-national-land-use-framework>

A Comprehensive Land Use Framework would also be beneficial to the assessment of achieving the presumption in favour of 'sustainable development'.

It would also support the points raised in consultation paragraph 29 (Q 13 and 14) supporting a hierarchy of cross boundary decision making from national to regional to local planning.

It is hoped that the Land Use Framework Green Paper proposal put forward by Defra Minister Mary Creagh will be the result of cross-department working with at least Defra, MHCLG, DfT and DESNZ.

Definitions

We support the use of word such as 'well-designed' and 'high quality', but are also concerned as to how these could best be defined?

Density

It is important to understand that density and trees and green infrastructure do not have to be mutually exclusive but recognise that trees can be included in higher density schemes. TDAG's *Trees, Planning and Development: A Guide for Delivery* illustrates this issue on pages 12-16. The guide can be found here: <https://www.tdag.org.uk/trees-planning-and-development.html>

Specific points

Consultation paragraphs 14 and 15: Feed for applications where there is currently no charge (Q93)

This is a difficult question for the reasons given in paragraph 14, but equally, there is emerging concern about 'when is tree protection not tree protection' and we are losing too many trees in conservation areas and with Tree Preservation Orders and this could be because local authority tree officers are too pressed to give the applications and decisions the time needed.

NPPF Clause 133:

We support the retention of this ambition for trees in new developments including the retention of existing trees given the now well documented and evidence-based research demonstrating the multiple social, environmental and economic benefits that trees deliver. Trees support biodiversity and tree-lined streets have been shown to provide movement corridors for birds and this links to the government's ambition to support nature recovery.

One of the problems with achieving 'tree-lined streets' is the interface with the Highway as many local council highways teams are reluctant to or refuse to adopt streets with trees and so there is the peculiar situation of split responsibility with the highway authority responsible for the carriage way and kerb and the footway but the developer or a management company responsible for the trees which may also include a soft landscape verge.

The argument that highway authorities put for not adopting trees is an assumption about the costs of maintenance. Tree experts advise that if all the right decisions are made at the outset – sorting out the location, proposing the best planting method for the location and then selecting the right trees and planting them in the right way and follow up with the right aftercare especially watering and possible canopy raising/post-planting structural pruning. The costs of maintenance should then be minimised. On a whole life costing basis, trees are one of the cheapest ways to raise the value and quality of place. Finally, we all need to talk about tree establishment, not just tree planting.

Details for Tree planting can be found in TDAG's *Trees in Hard Landscapes: A Guide for Delivery* available without charge here: <https://www.tdag.org.uk/trees-in-hard-landscapes.html> and the forthcoming guidance with technical drawings for street tree planting led by the Forestry Commission with support from a cross-industry steering group.

There are also issues with trees and underground utilities. TDAG would like to propose that utilities in all new developments are in shared service/utility ducts. Given the powers of utilities this may require legislation but it is hoped that MHCLG and DfT can further a change on these lines particularly if the ambitions of tree-lined streets, quality, healthy places and environmentally supportive active travel routes are to be achieved.

We have the National Underground Asset Register (NUAR) which is encouraging, but in many existing streets it is only ground-truthing that determines where services really are. It would be a positive gain for all if this problem were not repeated in new developments.

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