

**Trees, Landscape and
Development Supplementary
Planning Document (SPD)
Consultation Statement
May 2016**

Trees, Landscape and Development Supplementary Planning Document Town and Country Planning (Local Planning) (England) Regulations 2012 Consultation Statement in accordance with Regulation 12(a)

The Town and County Planning (Local Planning) Regulations of 2012 stipulate in Regulation 12(a) that before adoption of a supplementary planning document, the local planning authority must prepare a statement setting out:

- I. The persons that local planning authority consulted when preparing the supplementary planning document;
- II. A summary of the main issues raised by those persons, and;
- III. How those issues have been addressed in the supplementary planning document.

In accordance with that regulation 12(a) the persons and organisations listed in appendix A were consulted in preparing the Trees and Development SPD.

Consultation on the draft SPD was carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the measures set out in the Council's adopted Statement of Community Involvement.

The document was made available for public inspection for a six week period between the 2nd July 2015 and the 13th August 2015. Copies of the draft SPD were available during normal office hours at the following location:

- Lichfield District Council Office, Frog Lane, Lichfield.

Copies were also available to view on the Council's website. Further information was available by contacting the Spatial Policy and Delivery Team or e mailing developmentplans@lichfielddc.gov.uk. Responses could be made via the development plans e mail at developmentplans@lichfielddc.gov.uk and via the council's consultation system at <http://lichfielddc-consult.limehouse.co.uk/portal> or sent in writing to Spatial Policy and Delivery Manager. It was made clear on all publications that the consultation ended on Thursday 13th August 2015, 5.00pm

The following measures were undertaken to inform persons of the draft SPD consultation and document availability:

- Notification e mails were sent to all individuals/organisations/bodies that the Council considered would be affected or interested in the SPD.
- A Press Notice was posted in a local paper
- A press release was issued
- The SPD and details of the consultation were posted on the Council's website.

Appendix B to this document sets out the responses received to the consultation and how the issues raised have been addressed in the SPD.

Appendix A

Persons Consulted on the Trees, Landscape and Development SPD

All consultation was via email through the Planning Consultation Portal

| Persons Consulted | |
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| SPECIFIC CONSULTATION BODIES | |
| <p>All Parish Councils within Lichfield District</p> | <p>People on the Consultation Portal list: over 2000</p> |
| <p>Parish Councils outside Lichfield District</p> <ul style="list-style-type: none"> • Abbots Bromley Parish Council • Blithfield Parish Council • Brereton & Ravenhill Parish Council • Coton in the Elms Parish Council • Hoar Cross Parish Council • Lullington Parish Council • Middleton Parish Council • Netherseal Parish Council • Newton Regis, Seckington & No Man's Heath PC • Norton Canes Parish Council • Overseal Parish Council • Rugeley Town Council • Shuttington Parish Council • Stowe by Chartley Parish Council • Walton on Trent Parish Council • Yoxall Parish Council | <p>County Councils/Unitary Authorities</p> <ul style="list-style-type: none"> • Birmingham City Council • Derbyshire County Council • Leicestershire County Council • Staffordshire County Council • Stoke on Trent City Council • Walsall Metropolitan Borough Council • Warwickshire County Council |
| <p>Local Planning Authorities</p> <ul style="list-style-type: none"> • Cannock Chase Council • East Staffordshire Borough Council • Newcastle under Lyme Borough Council • North Warwickshire Borough Council • North West Leicestershire District Council • South Derbyshire District Council • South Staffordshire Council • Stafford Borough Council • Staffs Moorlands District Council • Tamworth Borough Council | <p>National Organisations</p> <ul style="list-style-type: none"> • Arts Council • British Pipelines Agency • British Telecom Group • Canal & River Trust • Central Networks • Centro • Crown Estates • Council of British Archaeology • Defence Infrastructure Organisation • Design Council • Forestry Commission • Environment Agency • Health and Safety Executive • Heritage Lottery Fund • Highways Agency • Historic England - Birmingham Office • Home Builders Federation • Inland Waterways Association (Lichfield Branch) • National Federation of Gypsy Liaison Groups |

Schools

- Chase Terrace Primary School
- Chase Terrace Technical College
- Hayes Meadow County Primary School
- Holly Grove Primary School
- John Taylor High School
- Little Aston Primary School
- Nether Stowe School
- Rawlett High School
- Saxon Hill School
- St. Stephens Primary School
- The Friary High School

- National Grid (Gas)
- National Grid Plant Protection
- National Trust
- Natural England
- Network Rail
- Office of Rail Regulation
- Royal Mail Group c/o DTZ
- Severn Trent Water Ltd
- Sport England
- Sport England West Midlands
- The Coal Authority
- Western Power Distribution

Other consultee groups/organisations

- Aldi Stores Ltd
- Alpha Project Management Ltd
- Alrewas Civic Society
- Alrewas Conservation Group
- Arts Foundation for Lichfield
- Ashfield Land Ltd
- Aspen Retirement Group
- AVK Motorsport Ltd
- Barton Willmore
- Barwood Strategic Land II LLP
- Beacon Street Area Residents' Association
- Beautiful Gardens
- BNP Paribas Real Estate UK
- Booth Trustees
- Borrowcop & District Residents' Association
- Borrowcop Management Consulting Ltd
- Bradshaw Bros. Ltd.
- Broome Manor Limited
- Building Research Establishment
- Burntwood Action Group
- Burntwood and Hammerwich Action Group
- Burntwood Business Community
- Burntwood Live at Home Scheme
- CALA Homes (Mids)
- Campaign for Real Ale Limited

- McClean Family Pension Fund
- Mease Valley Group
- Midland Co-op
- Miller Homes Ltd - East Midlands Region
- National Memorial Arboretum
- NAYC (Whitemoor Haye)
- NFGLG
- NFU Mutual Office
- NHS Cannock Chase Clinical Commissioning Group
- NHS Property Services Ltd
- NHS South East Staffordshire & Seisdon Peninsula CCG
- Objective Corporation
- Open Spaces Society
- OPT
- Orbit Housing Association
- Overbury
- Pall Mall Investments Ltd
- Palletways UK Ltd
- Paradise Found
- Parkridge Homes
- Partner Construction Ltd
- PDSA
- Persimmon Homes (West Midlands) Ltd
- Persimmon Homes Ltd
- Peter Roberts
- Pipe Green Trust
- Planning and Design Practice
- Planware Limited
- ProLogis
- Radleigh Homes

- Campaign to Protect Rural England - Staffordshire District Group
- Cannock Chase AONB Joint Committee
- Cannock Chase AONB Unit
- Carillion Developments
- Carnegie UK Trust
- CBI West Midlands Region
- Central Garage
- Central Rivers Initiative
- Chartre Associates Limited
- Chase & Partners
- Chasetown Preservation Group
- Chasewater Wildlife Group
- Christchurch Primary School
- Church Commissioners
- Civic Society
- Clifton Campville Millenium Green Trust
- Clinical Commissioning Group, NHS England
- Coltman Precast Concrete Ltd
- Country Land & Business Association Ltd
- CPBigwood
- CT Planning
- Curborough Consortium (RPS)
- Cycling Club Giro
- Data Identic Ltd
- David Wilson Estates
- Davy Developments Ltd
- Deloitte LLP
- Deltabridge Investments
- Derbyshire Gypsy Liaison Group
- Development Securities (Lichfield) Ltd
- Dorsman Estates Ltd
- Drayton Manor Park
- Eden Wood Limited
- Elford Homes Ltd
- Entec UK Ltd
- Envirowatch UK
- F W Ridout & Co
- Field Hamlin
- Fields In Trust
- Ramblers Association
- RCA Regeneration Limited
- Redrow Homes (Midlands) Ltd
- Represented by Star Planning
- Retirement Housing Group
- Revelan
- Revelan Group Plc
- Richborough Estates Ltd
- Ridware History Society
- Rob Duncan Planning Consultancy
- ROM Ltd
- Rowe & Sons
- Royal Institute of British Architects Client Services
- Royal Sutton Cycling Club
- RSPB Midlands Regional Office
- Rugeley Power Ltd
- S Harrison Developments Ltd
- Sainsbury's Supermarkets Limited
- Salton Europe Ltd
- Satnam Planning Services Ltd
- Savills
- Shenstone & District Car Club - Curborough
- Shipley Estates Limited
- Skills Funding Agency
- Smiths Gore ATE Wales
- Soleco UK Limited
- South Lichfield Residents Group
- South Staffordshire Mental Health Network
- South Staffordshire Water Plc
- Spire Healthcare Limited
- Sport Across Staffordshire & Stoke on Trent
- SSLEP
- St Giles Hospice
- St John's Church Shenstone & St Peter's Church Stonnall
- St Martins Property Investments Ltd
- St Pauls Res. & Commercial Property

- Fine Thompson Ltd
- First City
- Forest of Mercia
- Fosse Way Investments Limited
- Fradley Against Curborough Town
- Fradley Park Developments Ltd
- Fradley Village Hall Management Committee
- Fradley West Consortium
- Friend Associates
- Friends of Hopwas Wood
- Fulfen Primary School
- Future Energy Solutions
- GABEM (504225) Ltd
- GBSLEP
- GKN Group Services Limited
- Gladman Developments
- Gleeson Stategic Land
- Global Mapping Ltd
- Gregory Gray Associates
- Grosvenor Gospel Hall Trust
- Hammerwich Environment Group
- Hodgetts Estates
- Homes and Community Agency
- Hopwas Methodist Church
- Howkins and Harrison
- HS2 Ltd
- HSBC Bank PLC
- HSI UK Active Fund
- IGM Projects Ltd
- Infrastructure Planning & Design Limited
- Instaffs (UK) Ltd
- Institute of Directors
- International Power Plc
- J S Bloor (Services) Ltd
- J T Leavesley Ltd
- J.A. Nichols
- Johnson Fellows
- JPE Holdings Ltd
- JVH Town Planning Consultants Ltd
- St. Matthews Hospital Cricket Club
- Staffordshire Fire & Rescue Service HQ
- Staffordshire Gardens & Parks Trust
- Staffordshire Police - Trent Valley Division
- Staffordshire Police Partnership
- Staffordshire University Lichfield Centre
- Staffordshire Wildlife Trust
- Stewart Ross Associates
- Stoford Developments Ltd
- Streethay Against Development
- Sustrans
- Tamworth North Consortium/Walton Homes
- Taylor Wimpey UK Limited
- The Ancient Tree Forum
- The Association of Inland Navigation Authorities
- The Co-operative Group
- The Crown Estate
- The Landor Society of Rugeley
- The Meynell & South Staffs Hunt
- The National Forest Company
- The Ramblers Association - Staffordshire Area
- The Theatres Trust
- The Tree Council (UK)
- The Trent Valley Bowls Club
- Thomas Eggar
- Thomas Vale Construction
- Trustees of St. John's Hospital
- Village Retail Services Association
- W M Morrison Supermarkets
- Waitrose Ltd
- Walton Homes Limited
- Waterloo Housing Association Ltd
- West Midlands HARP Planning Consortium

- K B Jackson & Son (Midlands) Ltd
- Kenton Manor
- Kingfisher Holiday Park
- Kingswood Homes
- Lafarge Aggregates Ltd
- Lambert Smith Hampton
- LCP
- Leavesley Group
- Leomansley Area Residents Association
- Lichfield & District Council Voluntary Services
- Lichfield & District Cycle Forum
- Lichfield & Hatherton Canals Restoration Trust
- Lichfield & Tamworth Chamber of Commerce & Industry
- Lichfield & Tamworth Liberal Democrats
- Lichfield Alliance
- Lichfield Aspergers Parent Support Group
- Lichfield Cathedral
- Lichfield Civic Society
- Lichfield Cricket and Hockey Club and affiliate clubs
- Lichfield Cruising Club 2000 Ltd
- Lichfield Islamic Cultural Society
- Lichfield Rail Promotion Group
- Lichfield Skatepark Association
- Lingfield Assets LLP
- Lingfield Plc (Harris Lamb)
- Lingfield Securities plc
- Lioncourt Homes Ltd
- Little Aston Community Association
- London & Cambridge Properties Ltd
- London Midland
- Loxton Developments
- Lyalvale Express Ltd
- MADE
- West Midlands RSL Planning Consortium
- West Midlands, NHS Property Services Ltd
- Wilson Bowden Developments Ltd
- Woodland Trust

- Make it Stoke on Trent & Staffordshire
- Maples Hayes Trust
- Marine Fabrications Ltd
- Marrons

As part of the consultation 1396 members of the public were consulted. Details can be provided on request.

Appendix B

Trees, landscape and development SPD: summary of consultation responses

| Respondent | Section number | Comment | Response |
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| Alrewas Parish Council | - | No executive summary included | Action: Executive Summary to be added to follow that of other adopted SPDs and Introduction amended / expanded |
| Burntwood Town Council | - | No comments | Action : None required |
| Cannock Chase AONB Joint Committee | 2.42 | Welcomes the emphasis given to native planting and the acknowledgement of the role which heathland plays in the landscape. Requests that the AONB Management Plan (2014 -19) is referred to as policy context in each of the SPDs at the appropriate point(s) That the AONB Partnership is listed in the "Further contacts" sections of each of the SPDs | Comment noted. Action: Reference to Cannock Chase AONB, link to Cannock Chase AONB website and the AONB management plan to be added at 2.42 |
| Derbyshire Gypsy Liaison Group | 1.7 | The requirement for a tree survey and accompanying plan to be submitted with a planning application will be excessive in many circumstances. A blanket requirement does not accord with government guidance that requirements for supporting documentation should be proportionate. | The requirement for a tree survey and plan to be submitted with a planning application is in accordance with the current Lichfield District Council Local Planning Validation Requirements. The validation requirements list the type of planning application that should be accompanied by a tree survey and plan. The tree survey and plan follow best practice as given in British Standard 5837:2012 'Trees in relation to design, demolition and construction-Recommendations". Action: None required |
| Derbyshire Gypsy Liaison Group (2014) | 1.4 | The requirement for a tree protection plan is excessive. | The requirement for a tree protection plan to be submitted with a planning application is in accordance with the current Lichfield District Council planning application local validation requirements. The tree protection plan follows best practice as given in British Standard 5837:2012 'Trees in relation to design, demolition and construction-Recommendations". Action: None required |
| Derbyshire Gypsy Liaison Group (2014) | 3.18 | Para 3.18 states that facilitation tree pruning and pruning for health and safety should be undertaken prior to the start of any other work on a development site. The SPD | The trees to be removed as part of a development are usually agreed as part of the planning consent. Any additional tree removal beyond that agreed and any pruning of trees that are to be retained is often restricted by a condition attached to the planning consent. Written consent from the Council is |

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| | | requires that all pruning works must be agreed in writing with the Council. There is no basis on which the second sentence can be justified. Pruning work will often be outside the control of the Council. | required in relation to variations in the trees to be removed or to fulfil the requirements of the planning condition. Action: Clarify para 3.18 to include reference to planning conditions. |
| Derbyshire Gypsy Liaison Group (2014) | 1.4 | The requirement for a tree survey and plan to include off site trees within 15 m of the boundary is excessive. Trees more than 8 metres from a development site are unlikely to be affected and particularly so if small, so a requirement for mandatory documentation where trees are within 15 metres is too draconian. The requirement for such documentation in a Conservation Area, even where no trees are present is obviously unjustified. To refuse validation without such documentation does not accord with government guidance that requirements for supporting documentation should be proportionate | The requirement for information for on-site and off-site trees and sites in Conservation Areas is in accordance with the current Lichfield District Council planning application local validation requirements. Including off-site trees up to a distance of 15 m from the boundary addresses not only the potential tree root protection areas but other tree -related issues that may affect the design and layout of the development - such as excessive shading to gardens and rooms. Action: None required, in accordance with the current local planning validation requirements. |
| Derbyshire Gypsy Liaison Group (2014) | 1.16 - 1.17 | The requirement for a Tree Constraints Plan, is excessive, particularly in relation to a shadow path which will rarely be justified. | A Tree Constraints Plan is not listed as a document required in the current Lichfield District Council planning application local validation requirements. Therefore it is given as a “recommended” document in SPD, not a mandatory document. The tree constraints plan is a useful design tool which takes into account all of the constraints that trees may bring to a site such as root and crown protection zones and excessive shading and therefore helps developers and planning officers ascertain the best layout for a site that will reduce later conflicts between the users of the site and trees. A shadow path is particularly useful when designing residential sites as it can assist in the placement of private gardens, amenity space and can show where daylight may be reduced in living spaces. The tree constraints plan follows best practice as given in British Standard 5837:2012 ‘Trees in relation to design, demolition and construction-Recommendations’. Action: None required |

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| Derbyshire Gypsy Liaison Group (2014) | | <p>Advice regarding trees protected by a tree preservation order and trees within a conservation area in respect of permitted development is unclear</p> | <p>Comments noted.</p> <p>Action: Clarify paragraph 1.27</p> |
| WYG on behalf of Development Securities (Lichfield) Ltd | <p>1.4</p> | <p>Practical use of the document would be enhanced if it set out clearly the information the LPA would expect at the pre-application stage, validation requirements for the planning application submission and the level of detail relevant to discharge of conditions.</p> | <p>The information that the Council requires as part of a planning application is given in the Council's 'Planning Application Local Validation Requirements'. This document is reviewed, and where necessary updated, on a regular basis. Therefore applicants should refer to the edition of the Council's planning application local validation requirements that is current at the time of making their application to determine the information that the Council requires.</p> <p>The current list of local validation requirements includes several documents that are related to trees and landscaping. Therefore the SPD gives further guidance in relation to the information required by these local validation requirements.</p> <p>The documents identified as 'mandatory' in para 1.4 of the SPD relate to these requirements as current in 2015. However, consideration is given to the removal of the word 'mandatory' in the list of documents at para 1.4. This would allow for any amendments to the list of required documents in future versions of the planning application validation requirements.</p> <p>Action: Clarification and co-ordination of SPD with local planning validation requirements in consultation with Planning Development Manager.</p> <ul style="list-style-type: none"> • Part 1 throughout- add footnote references to the Council's 'Planning Application Local Validation Requirements' as appropriate. • Para 1.1 Add 'Local' to title 'Planning Application Local Validation Requirements' • Paras 1.4 and 2.45 Add information on Heritage Statements in respect of hedgerows in accordance with current local validation requirements and add information and guidance on historic hedgerows. • Paras 1.24-1.26 and 4.30 clarify requirements for landscaping schemes as given in the current 'Planning Application Local Validation Requirements' and added reference |

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| | | | <ul style="list-style-type: none"> • Amend para 1.4 and 1.24 – 1.26 to reflect local validation requirements, the need to provide flexibility for future amendments of the validation requirements and to ensure longevity of the SPD. • Remove Table 1 ‘<i>Documents required with your planning application or for pre-application advice.</i>’ for clarity in respect of the local planning validation requirements. This table may, however, be incorporated in a future edition of the local planning validation requirements. • Para 1.25, which addresses the requirement of landscape strategies and masterplans, to be amended to include reference to SuDS provision, to include broad development locations in addition to Strategic Development Allocation sites and a definition of ‘other significant major development sites’ added for clarity. |
| WYG on behalf of Development Securities (Lichfield) Ltd | 4.12 | At present, the language of the SPD would appear to unintentionally place additional burdens upon developers that are not necessarily appropriate and seeks to impose requirements more stringent than set out by policies within the NPPF. 4.12 indicates that soft landscaping should aim to enhance the setting of heritage assets; the statutory requirement set out in national legislation is to “preserve or enhance” | <p>Referred to LDC Principal Conservation and Design Officer. They consider that there is sufficient justification within the national planning policy framework and LDC core strategy for 4.12 to remain as original. Also noted support for 4.12-4.14 from Heritage England’s consultation response.</p> <p>Action. Minor amendments as recommended by Principal Conservation and Design Officer to</p> <ul style="list-style-type: none"> • 4.12 “soft landscaping within or close to historic buildings, gardens or conservation areas should aim to enhance <i>the heritage asset and/or its setting.</i>” • 4.13 Add “in consultation with the <i>County Archaeologist</i>” • 4.14 Add “early consultation with the Council’s <i>Conservation and Design Officer</i>” |
| WYG on behalf of Development Securities (Lichfield) Ltd | 1.14 | 1.14 the SPD states: “In Conservation Areas removal of Category C trees should be avoided unless sufficient land for replacement tree planting has been reserved on the site to ensure there is no net loss of tree provision” Suggested rewording: “In Conservation Areas removal of Category C trees should be avoided unless sufficient land for replacement tree planting has been | <p>Core Policy 14 states ‘In conservation areas, the built form will be protected and enhanced and there should be no net loss of trees’.</p> <p>Action: None required</p> |

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| | | reserved on the site to ensure there is no net loss of tree provision <i>where practicable.</i> ” | |
| WYG on behalf of Development Securities (Lichfield) Ltd | 2.38 | 2.38 provides a specific requirement regarding spacing distances between trees. It states that: ‘In general, no breaks greater than 10m should be proposed without discussion with our Countryside Officer.’ WYG is concerned that this fails to appreciate that landscaping schemes for individual sites need to take into consideration the site context (and in particular urban form) and whilst the guidance may be appropriate for a rural or suburban area, it would not necessarily be appropriate for City Centre developments, particularly where trees could interfere with underground infrastructure. Moreover if this requirement were to be imposed it could result in the excessive use of tree planters which are more difficult to maintain. | Para 2.38 relates to the retention of existing linear features – trees and hedgerows- rather than new planting, specifically in relation to the needs of bats and follows guidance in ‘ <i>Habitat Management for Bats: A Guide for Land Managers, Land Owners and their Advisors</i> ’ Joint Nature Conservation Committee 2001. Action: None required, is in accordance with best practice for protected species. See also response to Staffordshire County Council regarding para 2.38 below. |
| WYG on behalf of Development Securities (Lichfield) Ltd | 2.50 | Para 2.50 seeks to enhance the skyline with tree planting; whilst this can create pleasant vistas in rural and suburban locations, but if this requirement is rigorously applied within the city centre it could obscure view of the spires. Suggests that 2.50 should be reworded as follows: “New development should seek to preserve and enhance the skyline views through large tree planting <i>where appropriate</i> ” | Para 2.50 addresses the preservation and enhancement of the important skyline of Lichfield city in accordance with core policy CP 14 of the local plan. This states “the skyline of Lichfield city, characterised by the five spires emerging above the roofs and tree canopy will be protected and should inform the height, scale and layout for new developments.” This demonstrates that the tree canopy cover of Lichfield city is an important feature of the city and is and is one of the distinctive components of the city. Many of the trees within the city centre are also part of the Conservation Area and form the setting of the historic environment. Policy CP 14 also addresses the integration of views and vistas. It is considered that tree planting and the |

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| | | | <p>respect of existing, and the creation of new, views and vistas are not mutually exclusive if designed creatively.</p> <p>Action: None required.</p> |
| <p>WYG on behalf of Development Securities (Lichfield) Ltd</p> | <p>Table 1 and 1.25</p> | <p>Validation Requirements; WYG are concerned that some of the requirements within the SPD are ambiguous in respect of the validation requirements for major applications. Table 1 suggests that a Landscape Masterplan would be required for strategic allocations and major developments, although paragraph 1.25 suggests that this 'may' be required. Clarify landscape masterplan requirements</p> | <p>Comments noted in respect of the Council's requirement for a coherent and comprehensive landscape / green infrastructure strategy as part of a master plan.</p> <p>Action: Clarify requirements in consultation with Planning Development Manager:</p> <ul style="list-style-type: none"> • Para 1.25, which addresses the requirement of landscape strategies and masterplans, to be amended to include reference to SuDS provision, to include broad development locations in addition to Strategic Development Allocation sites and a definition added of other significant major development sites for clarity (i.e. major sites comprising 200+ dwellings or over 4 ha site area or more than 10,000 m² gross floor area). • Amend para 1.4 and 1.24-1.26 to reflect local validation requirements, the need to provide flexibility for future amendments of the validation requirements and to ensure longevity of the SPD. • Remove Table 1 '<i>Documents required with your planning application or for pre-application advice.</i>' for clarity in respect of the local planning validation requirements. This table may, however, be incorporated in a future edition of the local planning validation requirements. |
| <p>WYG on behalf of Development Securities (Lichfield) Ltd</p> | <p>4.4</p> | <p>Para 4.4 indicates that the Council 'may' require a number of landscape documents. The list provided has been carefully considered and therefore WYG consider that it must be possible for the Council to identify here what types of applications would need</p> | <p>Para 4.4: LDC current Local Planning Application Validation Requirements states that all planning applications (excluding Householder, Listed Building Consent, Advertisements and change of use) or where a development affects the setting of a designated heritage asset, should be accompanied by hard and soft landscaping details. This document is reviewed, and where necessary updated, on a regular basis. Therefore applicants should refer to</p> |

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| | | <p>to include this information within the planning application submission. This may be a size threshold or tied to the location of the development. WYG considers that the level of information detailed at 4.31 may be appropriate to some planning applications, but not all. The Council may wish to revise the wording of this paragraph to say ‘...a landscaping condition should where appropriate include a....’</p> | <p>the edition of the Council’s Planning Application Local Validation Requirements that is current at the time of making their application to determine the information that the Council requires.</p> <p>Action: Add reference to LDC Planning Application Local Validation Requirements</p> <p>Para 4.31: Relates to landscape proposals submitted with a planning application and also to those submitted to fulfil a planning condition. Details required are in accordance with, and the guidance related to, the current LDC planning application local validation requirements and policies CP14 and BE1. Therefore it is considered that an amendment to 4.31 is not required.</p> <p>Action: None required</p> |
| <p>WYG on behalf of Development Securities (Lichfield) Ltd</p> | <p>4.55</p> | <p>Para 4.55 states that “On larger sites we require cross sectional plans of typical street layouts including overground and underground section” WYG consider this to be an onerous validation requirement for a planning application, the Council should also consider providing a definition of what is meant by a ‘larger site’.</p> | <p>‘Larger sites’ as per the proposed amended para 2.25 refers to Strategic Development Allocation sites and Broad Development Area sites as given in the Council’s Local Plan and major sites comprising 200+ dwellings or over 4 ha site area or more than 10,000 m² gross floor area.</p> <p>Street trees and other large green infrastructure provision on such sites should be regarded as infrastructure of similar importance to highways or utility services, for example. Street trees should be provided with sufficient underground and above ground provision such that they are able to grow to their full potential, exist for their natural life span and/or the lifetime of the development, which may be a substantial period of time, in order to deliver their benefits in respect of amenity, health and climate change adaptation.</p> <p>Street trees are subjected to constraints such as hard surfaces, highway construction and often underground services nearby. Sufficient consideration therefore must be given at the planning stage to ensure all these components can be accommodated without future conflict or damage to any component. Cross sectional street scenes including an underground profile as part of the landscape strategy and masterplan for these large sites allows a realistic assessment of whether sufficient provision for the trees, and any future conflict, has been ‘designed-out’.</p> <p>Policy NR4 states ‘ Sufficient space within development must be reserved for the planting and sustainable growth of large trees in order to retain the</p> |

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| | | | <p>important tree canopy cover in conservation areas and the built environment, and to improve tree canopy cover in the district as a whole'. The concept statements for the strategic development allocations sites state that the landscape framework and planting strategy for each site should be produced as a driver for the designed layout.</p> <p>Action:</p> <ul style="list-style-type: none"> • Clarify the nature of the sites where this may be applicable. • Add reference to 'Trees in Hard Landscapes: A Guide for Delivery' Trees and Design Action Group 2014 to provide further design information |
| <p>WYG on behalf of Development Securities (Lichfield) Ltd</p> | <p>1.24 and 4.31</p> | <p>Part 4 contains useful information in respect of the issues to be considered at the design stage. However WYG are concerned that as the SPD is a material consideration in the determination of planning applications, that the Council need to make it clear within this section that the level of detailed required would need to be proportionate to the proposals.</p> <p>The Council should also clarify that this level of detail will often be considered as part of a discharge of conditions application rather than an issue for consideration at the planning application stage. Requiring this information 'up front' would place an unnecessary burden upon developers.</p> | <p>The information that the Council requires as part of a planning application is given in the Council's Planning Application Local Validation Requirements. This document is reviewed, and where necessary updated, on a regular basis. The list of local planning validation requirements is the principal document in relation to information required as part of an application. Therefore applicants should refer to the edition of the local validation requirements that is current at the time of making their application to determine the information that the Council requires.</p> <p>With respect to landscaping, the current requirements state that all planning applications (excluding Householder, Listed Building Consent, Advertisements and change of use) or where a development affects the setting of a designated heritage asset, should be accompanied by hard and soft landscaping details. The local validation requirements also set out the information that is required with the landscaping proposal.</p> <p>In some instances the landscaping details are submitted as a condition of planning consent. The use of landscape planning conditions is noted in paragraph 1.24 and 4.31 of the SPD.</p> <p>The current list of local validation requirements includes several documents that are related to landscaping. Therefore the purpose of the SPD is to give further guidance in relation to the information required by the validation requirements and, when considered appropriate by the planning officers, any landscaping details that may be subject to a landscaping condition as part of planning consent.</p> |

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| | | | <p>Para 4.31 of the SPD gives further information on required landscaping details and expands on some areas to give further technical guidance. Paragraph 4.30 is suitable in respect of both the information required with a planning application and the landscaping proposals that may be submitted as part of the discharge of planning conditions.</p> <p>As the local validation requirements are the principal document, and in order that the SPD remains flexible to accommodate any future changes to these requirements, it is considered that further detail is unnecessary other than including clearer direction to the validation requirements.</p> <p>Action: Amend paragraph</p> <ul style="list-style-type: none"> • 1.24-1.26 to include reference to LDC Planning Application Local Validation Requirements. • 4.31 to include reference to LDC Planning Application Local Validation Requirements. |
| <p>Environment Agency (2014)</p> | | <p>The Environment Agency strongly supports the development of this document because it provides additional guidance to developers, advising them of the benefits of incorporating green infrastructure within all new developments, promoting best practice.</p> <p>This SPD will support the delivery of policies HSC1: Open Space Standards, NR3: Protected Species & their Habitats, NR6: Linked Habitat Corridors & Multifunctional Green Spaces, included within the Local Plan. One recommendation relates to an amendment within Chapter 4, Landscaping Provision.</p> <p>Within paragraph 4.17 Positive for Climate Change, Sustainability and Heath and Well Being (Page 28). The Environment Agency recommends that the text be expanded to include the following wording:</p> | <p>Comments noted.</p> <p>Action: Added recommended paragraph to the SPD at 4.17 under 'Positive for Climate Change, Sustainability and Heath and Well Being'.</p> |

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| | | <p>“Furthermore, consideration of appropriate tree planting and landscaping is essential on sites adjacent to or protected by flood defences. Earth embankments can become fractured and damaged via the root action of certain established vegetation. Planting strategies adjacent and on such features will need to be agreed with the Environment Agency to ensure the long term sustainability of communities and protection against climate change.</p> <p>Planting within 8 meters of a main river or within the floodplain may require a flood defence consent from the Environment Agency.”</p> | |
| Framptons | - | <p>Considering the guidance and recommendations set out in the supplementary planning document, there is nothing recommended that is unusual or beyond what is normally provided within the scope of an arboricultural baseline report, arboricultural impact assessment, arboricultural method statement and associated plans. No suggested actions</p> | Action: None required |

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| Highway Agency (2014) | - | No comments | Action: None required |
| Historic England (West Midlands) | 4.12 4.13 4.14 | We support the references within the document to the need to protect and maintain existing trees within Conservation Areas, where they are part of the local distinctiveness and value of the Conservation Area. There may also be other occasions where trees are considered valuable to the significance of a heritage asset and/or its setting and this would make a useful reference within the document. We support the inclusion of Paragraphs 4.12, 4.13 and 4.14. A useful inclusion to paragraph 4.14 would be a reference to locally designated assets from the Council's Local List. | Support for paragraphs 4.12 - 4.14 noted. The principal document for the historic environment is the Historic Environment Supplementary Planning Document and therefore to prevent duplication reference to this document could be included. This document gives further information on heritage assets including locally designated assets from the Council's Local List. Action: Paragraph 4.12 - include reference to the Historic Environment Supplementary Planning Document and the council's Principal Conservation and Design Officer. Examples of historic landscape features to be added. |

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| <p>National Forest (2014)</p> | | <p>The National Forest Company (NFC) strongly support the publication of this document which clearly sets out the importance of retaining trees and hedgerows within development and the need to incorporate high quality new landscaping. The NFC welcomes the aspiration to increase tree canopy cover in urban areas to 20%.</p> | <p>Support noted.</p> <p>Action: none required</p> |
| <p>National Forest (2014)</p> | | <p>Para 4.1 The National Forest Company (NFC) considers that this section should refer to the need to incorporate woodland planting as part of new development within The National Forest and make reference to our Guide for Developers and Planners which provides guidance on how this could be achieved. In addition, the NFC considers that landscaping of new development within The National Forest should aim to reflect its Forest location through significant specimen tree planting such as highway trees, trees in private gardens and parkland creation in open space. These alterations would make this section more locally relevant.</p> | <p>Comment noted. Additional information considered to be more appropriate to para 2.42, which addresses green infrastructure and open spaces, than section 4 - landscaping. Suggest the following amendments added at 2.42</p> <p>Action:</p> <ul style="list-style-type: none"> • Link to the National Forest's '<i>Guide for Developers and Planners</i>' added at para 2.42. • Expand para 2.42 to give further guidance on creation of green infrastructure to include the National Forest area and also reference other distinctive areas or plans related to the district such as: <p>Forestry Commission West Midlands: West Midland Forestry Framework and West Midlands Woodland Opportunities (England) maps, Cannock Chase AONB: Management Plan 2014-2019, Central Rivers Initiative, Forest of Mercia, Staffordshire Biodiversity Action Plan: Ecosystem Action Plans.</p> |

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| National Forest (2014) | 4.31 | <p>The National Forest Company (NFC) considers that the landscape maintenance regime should also require details of protection from strimming and grass cutting for specimen trees proposed within grassed areas. The NFC has found that damage to newly planted trees by strimming around their base to be one of the major causes of tree losses in new developments.</p> | <p>Comment noted.</p> <p>Action: add protection from mower and strimmer damage for specimen trees at para 4.31 as part of a landscape maintenance proposal</p> |
| Health and safety executive | - | No comments | Action: None required |
| Natural England | - | <p>Welcomes the documents reference to the importance of early discussions regarding draft planning proposals and the range of opportunities this presents to avoid adverse impacts and maximise opportunities for:</p> <ul style="list-style-type: none"> • protection, enhancement and creation of environmental assets where appropriate • climate change mitigation • health and well-being <p>Welcomes link to policy NR4 and advises that the SPD may be strengthened by earlier reference to the district's landscape character, especially in view of the context this offers the document as a whole.</p> <p>Recommend the SPD refers to National Character Area profiles and county landscape character documents Staffordshire county council "supplementary planning guidance-planning for landscape change"</p> | <p>Comment noted.</p> <p>Action: Reference to landscape character and historic character of the district, the role of trees, hedgerows, woodland and the designed landscape within this and sources of information to be added to the introduction section of the SPD.</p> |

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| <p>Natural England (2014)</p> | <p>-</p> | <p>Biodiversity: This SPD should encourage the taking of opportunities to incorporate features which are beneficial to wildlife into final proposals for development. The Council may wish to consider whether it is appropriate to provide guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment.</p> | <p>Comments noted. The retention, enhancement and provision of new native trees, hedgerows and woodlands have strong benefits for wildlife. This is promoted within the SPD. Detailed biodiversity recommendations, such as bird box provision, are outside the scope of the SPD.</p> <p>Action: none required</p> |
| <p>Natural England (2014)</p> | <p>-</p> | <p>Green infrastructure: This type of SPD should, where possible, provide a clear focus in relation to Green Infrastructure (GI) provision. Where possible such provision should be incorporated into new development. Greener neighbourhoods and improved access to nature may also improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks. It is important to emphasise the multi-functional benefits of GI to biodiversity, amenity, recreation and health and wellbeing and the need to consider GI in urban design and demonstrate how GI and green and open spaces could link to the wider GI network and interlink with access, the landscape and biodiversity. There may be significant opportunities to retrofit green infrastructure in urban environments. The protection of natural resources, including air quality, ground and surface water and soils needs to be considered in all urban design plans.</p> | <p>Comments noted. Benefits of green infrastructure and multifunctional green space are included in this SPD and the council's "Sustainable Design" SPD.</p> <p>Action: Reference the council's "Sustainable Design" SPD where appropriate</p> |

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| <p>Natural England (2014)</p> | <p>-</p> | <p>Landscape enhancement: This SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> | <p>Comments noted. The incorporation of ultimately large size trees is promoted within the SPD both for their value in the landscape and also for their contribution to climate change adaptation. New tree planting, species selection and location is addressed in the SPD.</p> <p>Action: none required</p> |
| <p>Natural England (2014)</p> | <p>-</p> | <p>Lighting: The SPD should consider the impact of lighting on landscape and biodiversity.</p> | <p>Comments noted. The Council's sustainable development and historic environment supplementary planning documents are more suited to address lighting within design. The Council's Ecology team assess lighting in relation to biodiversity as part of the consideration of planning applications. This SPD directs applicants to the Ecology team in respect of lighting near hedgerows.</p> <p>Action: Para 2.41 add additional reference to Ecology team in respect of lighting near woodland.</p> |
| <p>Natural England</p> | <p>-</p> | <p>Long-term maintenance requirements: provision for the long-term maintenance (including monitoring where appropriate with a contingency plan for e.g. tree species loss) of trees and landscaping needs to be funded for a suitable timescale and/or a management company established to have responsibility for this aspect of a development scheme.</p> | <p>Comments noted. This SPD relates to the design of new landscaping and its maintenance during the period given as part of the landscaping conditions related to each development. Details in respect of funding for long term landscape maintenance or the delivery of management e.g. by a management company, is outside the scope of this SPD. Habitat creation and management plans would, additionally, be considered by the council's ecology team. However it is accepted that attention should be drawn to these considerations within the document.</p> <p>Action: Suggest add guidance at paragraph at 4.31 <i>'You should also consider how the landscaped area will be managed after the initial establishment phase is completed, who will have the ownership of, or responsibility for, the landscaped area and how this will be funded. We recommend early discussion with the Council's Planning Officers and Greens and Open Spaces Strategy Manager.'</i></p> |

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| Network Rail (2014 and 2015) | 4.16 | <p>Network Rail has a duty to provide, as far as is reasonably practical, a railway free from danger or obstruction from fallen trees. Network Rail requests therefore that</p> <ul style="list-style-type: none"> • no trees are planted next to the boundary with network rail land and the operational railway in any submitted planning applications. • only evergreen shrubs are planted in such proposals • they are planted a minimum distance from the Network Rail boundary that is equal to their expected mature growth height. • Where tree removal, tree stump removal, tree root removal or pruning of trees is proposed adjacent to the operational railway the applicant contacts Network Rail's Asset Protection Team with a risk assessment and method statement prior to works on site commencing. | <p>Comments noted.</p> <p>Action: Insert additional paragraph at 4.16 giving guidance regarding new planting and works adjacent to network rail land and the operational railway as recommended.</p> |
| Office of road and rail | - | No comments | Action taken: none required |

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| Staffordshire County Council | - | <p>The SPD is a good model for woodland, trees and hedgerows but fails to cover other important aspects of landscaping such as other habitat and planting types and landscape and ecological character. Either this should be addressed or the SPD renamed to reflect its real scope.</p> | <p>The SPD addresses existing trees, woodlands and hedgerows and these elements within new soft landscaping as part of development. The scope of the SPD was not intended to include detailed advice on large-scale landscape character or other ecological habitat management/creation as these are addressed in other documents by Lichfield District Council, Staffordshire County Council and the Staffordshire Wildlife Trust.</p> <p>Action: Retain original title. Additional detail on the scope and limitation of the SPD to be included in the proposed Executive Summary and Part 4 for clarity.</p> |
| Staffordshire County Council | 1.21 | <p>The Tree Protection Plan should be in accordance with BS 5837: 2012 showing the retained trees in relation to the final layout. It should show the position of all barriers, ground protection and any other methods to be used to protect the trees. The SPD could suggest a type of protective barrier preference.</p> | <p>Preferred type of barrier is given in Appendix B '<i>Specification for protective barrier</i>' and is the industry-standard from BS5837: 2012 'Trees in relation to design, demolition and construction-Recommendations'.</p> <p>Action: None required</p> |

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| Staffordshire County Council | 1.25 | <p>1.25 Recommend reference to SuDS included as follows ‘ This is in order to ensure that the landscaping forms an integral part of the design of the development and that future detailed landscaping schemes deliver the overall vision for the site, <i>including reference to incorporation of SuDS provision into such schemes.</i></p> | <p>Comments noted.</p> <p>Action: In consultation with Planning Development Manager amend para 1.25 to include reference to SuDS provision, to include broad development locations in addition to Strategic Development Allocation sites and a definition added of other significant major development sites for clarity.</p> |
| Staffordshire County Council | 2.29 | <p>2.29 could additionally refer to distances from hedgerows of development and highways to avoid damage and future conflicts.</p> | <p>Recommended distances for hedgerows included in paragraph 2.45</p> <p>Action: None required</p> |
| Staffordshire County Council (2014 and 2015) | 2.36 | <p>2.36 could refer to ponds as well as other SuDS features and perhaps reference other landscaping types such as wetland planting including reed-beds</p> | <p>The Sustainable Development Supplementary Planning Document is the principle SPD in relation to SuDS.</p> <p>Action: Reference to reed beds to be added as an example of other vegetation that can be planted within SuDS. As the Sustainable Development Supplementary Planning Document is the principal SPD in relation to SuDS no additional amendments are proposed in order to avoid duplication.</p> |
| Staffordshire County Council | 2.38 | <p>Section 2.38 it is recommended that consideration of impacts on bats is required for gaps under 10 metres. Joint Nature Conservation Committee (JNCC) Habitat Management for Bats guidance states that gaps as small as 10m may prevent bats using hedgerows and treelines and would allow installation of a road that could form a barrier to movement. Could the specification for consultation with the Ecology Team be reduced to gaps over 5 metres?</p> | <p>Best practice guidance <i>‘Habitat Management for Bats: A Guide for Land Managers, Land Owners and their Advisors’</i> Joint Nature Conservation Committee 2001 states ‘Avoid fragmentation and isolation of habitats. Dividing habitats into smaller areas, or isolating them through loss of connecting features such as hedgerows, may prevent them from being used by some bats. For example, even gaps as small as 10 m may prevent bats – especially the smaller species – from using hedgerows as a route to fly between roosts and foraging areas.’ SPD para 2.38 follows guidance and states ‘ Linear groups of trees and hedgerows may be important navigational aids for bats. In general, no breaks greater than 10m should be proposed without discussion with our Countryside Officer.’ Referred to Ecology Team</p> |

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| | | | <p>Action taken: Ecology team advise retain 2.38 as original. Amend 'countryside' to 'ecology' officers throughout document.</p> |
| <p>Staffordshire County Council (2014 and 2015)</p> | 2.42 | <p>Section 2.42 gives an over-emphasis on woodland at the expense of other landscape components. Reference should be made not only to the AONB, Forest of Mercia and National Forest but to the Central Rivers Initiative, Natural England Biodiversity Opportunity Maps and Staffordshire Biodiversity Action Plan Ecosystem Action Plans which should also inform green infrastructure / landscape design.</p> <p>Within Section 2 Site Layout and Design: wording in s.2.42 should reflect the most up-to-date thinking about mitigation of visitor impacts on Cannock Chase SAC which is that alternative green space provision may not be as effective as other mitigation measures. The Cannock Chase SAC Partnership has reviewed the Footprint Ecology mitigation proposals for impact of recreational impacts on the SAC and has concluded that, due to the unique nature of the SAC, mitigation through alternative natural space provision is of limited effectiveness as the features of open landscape scale and type that draw visitors to the SAC cannot be replicated on small sites. Removal of reference to the SAC in the heading of this section is recommended.</p> | <p>Comments noted. The SPD addresses existing trees, woodlands and hedgerows and these elements within new soft landscaping as part of development. The scope of the SPD was not intended to include detailed advice on large-scale landscape character or other ecological habitat management/creation as these are addressed in other documents. However, signposts to other sources of information may be appropriate.</p> <p>Action:</p> <ul style="list-style-type: none"> • In consultation with planning policy officers consider removing reference to Cannock Chase SAC in heading 2.41-2.42 so that this reads 'Open Space Provision of Natural and Semi-Natural Green Space ' • Add additional information at 2.41 to give further guidance on creation of green infrastructure and to also reference distinctive areas or plans related to the district such as:: <p>Forestry Commission West Midlands: West Midland Forestry Framework and West Midlands Woodland Opportunities (England) maps, National Forest: Guide for Developers and Planners, Cannock Chase AONB: Management Plan 2014-2019 and future documents, Central Rivers Initiative, Forest of Mercia, Staffordshire Biodiversity Action Plan: Ecosystem Action Plans.</p> |

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| Staffordshire County Council | 2.43- 2.48 | Sections 2.43-2.48 do not cover other aspects of landscaping outside of woodland, trees, hedgerows and orchards. Landscape features such as heathland, meadows, geological features, ponds and wetlands should be covered or the SPD renamed to make clear that it covers woodland, trees and hedgerows only. | <p>The SPD addresses existing trees, woodlands and hedgerows and these elements within new soft landscaping as part of development. The scope of the SPD was not intended to include detailed advice on large-scale landscape character or other ecological habitat management/creation as these are addressed in other documents.</p> <p>Action: Retain original title. Additional detail on the scope and limitation of the SPD to be included in the proposed Executive Summary and Part 4 for clarity. Expand introduction to include information on the role of woodland, trees, hedgerows and other related features for biodiversity.</p> |
| Staffordshire County Council | 4.23 | Section 4 relates only to trees in landscaping, other planting types are not covered, except for a very brief reference in 4.23 to heathland, giving the impression that planting/habitats other than woodland and trees are possibly not favoured. | <p>The SPD addresses existing trees, woodlands and hedgerows and new provision within new soft landscaping as part of development. Whilst the SPD does draw upon the wider landscape context the scope of the SPD was not intended to include detailed advice on large-scale landscape character or other ecological habitat management/creation as these are addressed in other Lichfield District Council, Staffordshire County Council and Staffordshire Wildlife Trust documents.</p> <p>Action: Additional detail on the scope and limitation of the SPD to be included in the proposed Executive Summary and part 4 for clarity.</p> |
| Staffordshire County Council | 4.20 | Section 4.20 - there needs to be reference here or elsewhere in the SPD to assessment of habitats present and avoidance of tree planting on or very close to habitats of existing value, such as heathland, species-rich grassland and wetlands, which could be damaged by such planting. | <p>Comment noted. Amendment considered to be more appropriate at 4.28.</p> <p>Action: Amend para 4.28 to include 'habitats of existing value'</p> |

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| Staffordshire County Council | 4.28 | Section 4.28 - It is suggested that this should specify that Countryside Officer advice should be taken for all large landscape/green infrastructure schemes whether close to a designated site or not. | <p>Comment noted.</p> <p>Action: Reference to Council's Ecology team and Council's Greens and Open Spaces Strategy Manager to be added at 4.1</p> |
| Staffordshire County Council | 4.31 | Section 4.31 does not refer to elements of landscaping other than trees and shrubs, e.g. seed mixes for grassland, maintenance of grassland, heathland, wetlands etc. | <p>The SPD addresses existing trees, woodlands and hedgerows and these elements within new soft landscaping as part of development. Whilst the SPD does draw upon the wider landscape context the scope of the SPD was not intended to include detailed advice on large-scale landscape character or other ecological habitat management/creation as these are addressed in other Lichfield District Council, Staffordshire County Council and Staffordshire Wildlife Trust documents.</p> <p>Action: Additional detail on the scope and limitation of the SPD to be included in the proposed Executive Summary and Part 4 for clarity.</p> |
| Staffordshire County Council | 4.31 | It is recommended that applicants are advised to consider long-term maintenance of landscape areas in addition to the statutory aftercare period. | <p>Comments noted. This SPD relates to the design of new landscaping and its maintenance during the period given as part of the landscaping conditions related to each development. Details in respect of funding for long term landscape maintenance or the delivery of management e.g. by a management company, is outside the scope of this SPD. However it is accepted that attention should be drawn to these considerations within the document.</p> <p>Action: Add suggested paragraph at 4.31 <i>'You should also consider how the landscaped area will be managed after the initial establishment phase is completed, who will have the ownership of, or responsibility for, the landscaped area and how this will be funded. We recommend early discussion with the Council's Planning Officers and Greens and Open Spaces Strategy Manager.'</i></p> |

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| Staffordshire County Council | 2.11 | Section 2.11 - Within the bullet point list, to be a sustainable development the design and layout of landscape plans must also consider the conservation and enhancement of the setting of designated heritage assets such as Listed Buildings, Scheduled monuments, Registered Parkland etc. Landscape designs should also consider potential impacts a scheme may have upon historic sightlines and vistas and potentially where a scheme can enhance historic viewpoints. Could there be signposting to the Historic Development SPD? | Comment noted. Action: <ul style="list-style-type: none"> • Expand introduction to include the role of trees, woodland, hedgerows and the designed landscape as part of the historic landscape • para 2.11 add direction to 4.12-4.13 • para 4.12 add reference to Historic Environment SPD and early consultation between parties. |
| Staffordshire County Council | 4.2 | Section 4.2 - The Lichfield Local Plan (Policy BE1 - High Quality Design) recognises the importance of the historic environment in defining an areas unique character. High quality landscaping can play an important role in the conservation and enhancement of an areas historic environment and in turn enhance its unique sense of place. This can be achieved through early consultation and understanding of the historic character of the area. Co-operation between historic environment specialists and landscape architects can to create an informed design. This could be particularly powerful where schemes lie within areas of high quality historic landscape character, within historic parkland or in historic urban cores. This should be recognised within the bullet point list of this section. | Comment noted. Action: <ul style="list-style-type: none"> • Amend introduction to include the role of trees, woodland, hedgerows and the designed landscape as part of historic landscape • Amend para 2.11 bullet point adding directing to 4.12-4.13 • Amend para 4.12 adding reference to Historic Environment SPD and recommendation for early consultation between parties |

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| Staffordshire County Council | 4.12 | Section 4.12 - Is to be supported as is the reference in the text to the emerging Historic Environment SPD for Lichfield District. Design within the urban landscape may also be informed by the joint Historic England and Department of Transport document entitled 'Streets for All: West Midlands' and relevant Conservation Area Appraisals | Support noted. As the Sustainable Design and Historic Environment SPDs are the principal documents for built design no additional references are considered needed in this SPD. Action: None required |
| Staffordshire County Council | 2.33 2.36 4.17 4.37 | We welcome the inclusion and reference to SuDs in section 2.33 and 2.36 and how SuDs could be used in multi-functional spaces, creating a dual function with amenity and water management. We welcome that SuDs are mentioned within climate change section 4.17 as this will strengthen our local requirements for climate change to be incorporated within drainage design and for developers to design for exceedance. We welcome 4.37 and the reference to linking SuDs with water management within landscaped areas. | Comments noted Action Taken: None required |

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| <p>Woodland Trust</p> | <p>-</p> | <p>We are pleased to see the Council's aspiration to achieve 20% tree canopy in urban areas. In both urban and rural areas, the Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that are addressed by green infrastructure provision. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WAS_t) for local authorities to aim for, as set out in our 'Space for People' publication. The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. <p>'Space for People' shows that, whilst some 17% of people in the West Midlands benefit from an accessible woodland within walking distance (500m) of their homes, in Lichfield DC this figure is only 10%.' We would be pleased for 'Space for People' and the Woodland Access Standard to be used to inform this SPD in order to increase the accessible woodland resource in Lichfield.</p> | <p>The standards listed do not accord with the adopted local plan strategy policy HSC1 and the SPD cannot amend the policy. However, the evidence is noted and could be utilised in any future policy review.</p> <p>Action: None required</p> |
| <p>Woodland Trust</p> | <p>1.14</p> | <p>Paragraph 1.14 We are pleased to see the aspiration to achieve no net loss of tree cover in Conservation Areas. However in order to achieve the Council's 20% canopy cover aspiration we suggest that</p> <ul style="list-style-type: none"> a) This should be extended to the whole District, not just Conservation Areas, and b) There should be | <p>Para 1.14 relates to trees in conservation areas in accordance with policies CP 14 and BE1 and therefore predominantly in respect to the historic environment. Across the wider district there is insufficient evidence to require 2 for 1 replacement to ensure tree success, and the increase in tree canopy cover can be achieved through a variety of measures in order to achieve the objectives of CP3 -mitigating adapting to the adverse effects of climate change. This may, for example, include planning conditions addressing the establishment, maintenance and replacement of newly planted trees, tree</p> |

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| | | <p>a ‘two-for-one’ replacement policy for any tree removal.</p> | <p>preservation orders on newly planted trees or the introduction of woodland as part of open space provision. Part 4 of the SPD addresses establishment and maintenance of newly planted trees.</p> <p>Action: Add footnote reference in the introduction to Lichfield District Strategic Partnership Carbon Reduction Plan in respect to canopy cover aspiration.</p> |
| <p>Woodland Trust</p> | <p>2.40</p> | <p>Paragraph 2.40 We are objecting to this paragraph because it does not provide absolute protection for ancient woodland and ancient trees. It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. With Lichfield District Council showing a below average ancient woodland resource at 1.04% of land area compared to a UK average of 2.5%, it is critical that this valuable natural resource is absolutely protected in this SPD.</p> <p>It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees.</p> <p>We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be ‘wholly exceptional’. Until the NPPF is amended</p> | <p>The concerns of the respondent are noted, however some of the changes required would not accord with the current National Planning Policy Framework. Policy NR4 of the Local Plan Strategy addresses ancient woodland as follows ‘In the case of ancient woodland and veteran tree(s), development will be resisted as mitigation for these unique assets cannot be achieved’. It is recognised that ancient woodland is scarce in the district and therefore additional information has been added to reinforce this.</p> <p>Action:</p> <ul style="list-style-type: none"> • Information from the Local Plan Strategy to be added to para 2.40 • The importance of trees and woodland, including ancient woodland, for nature conservation and as habitats of principal importance to be added to the introduction of the SPD. • Reference to Natural England and Forestry Commission’s standing advice for ancient woodland and veteran trees in the planning system and the Forestry Commission’s assessment guide ‘Ancient Woodland and Veteran Trees: Assessment Guide to Potential Impacts in relation to Planning Decisions’ to be added at para 2.40. |

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| | | there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF. We would therefore like to see paragraph 2.40 read: 'Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted'. | |
| Woodland Trust | 4.11 | Paragraph 4.11 We are pleased to see this paragraph on tree disease. | Support noted. Action taken: none required |
| Woodland Trust | 4.23 | Paragraph 4.23 We are pleased to see this paragraph on habitat creation and enhancement. Our ecosystems are under increasing pressure from multiple factors. The Government's Forestry and Woodlands Policy Statement (Jan 2013) places resilience and climate change at the core of its objectives. Protection of irreplaceable ancient and semi-natural woodland, restoration of degraded ancient woodland plus the addition of new and diverse woodland creation to buffer and extend our depleted and fragmented habitats can all significantly help resilience. We would therefore like to see this paragraph 4.23 aspire towards creating resilient landscapes in Lichfield supported by woods and trees. | Support noted. The creation of resilient landscapes and the role of trees and woodland is promoted by the council through the production of this SPD. The SPD considers habitat linkages and refuges for animals and plants as a key part of sustainable development, however this could be made more explicit within the SPD. Much of the information given in the SPD helps to provide resilient landscapes, for example, paras 2.39-2.46 address the variety of wooded habitats, 4.6- 4.8 address diversity of species,. Action taken: Expand introduction to include information on the role of woodland, trees, hedgerows and other related features for biodiversity, including the importance of connectivity and particularly linking Habitats of Principle Importance (as defined in the National Planning Policy Framework 2012) and reference to Local Plan Policy NR6 'Linked Habitat Corridors and Multifunctional Greenspaces'. |