



Our ref: FOI 26/30 IR

17th July 2026

Dear [REDACTED]

Thank you for your request to The Royal Parks (TRP) for an internal review of our response to FOI 26/30 concerning the delay to publication of the Richmond Park Tree Strategy (RPTS).

We have conducted an internal review and reconsideration of your request under the Environmental Information Regulations 2004 (EIR). This included a fresh review of the information previously provided, the application of Regulations 12(4)(d) and 12(4)(e), the associated public interest test, and whether the information should have been assessed on a document-by-document basis rather than withheld in full.

Context

We accept that our original response did not adequately explain the relationship between the various tree strategies, and other associated strategies and plans, developed from 2023 onwards. We feel this is important context as it goes some way to explaining the timeline.

In summary:

- A draft Richmond Park Tree Strategy (RPTS) was developed in 2023 and considered at Park Management and Executive Committee (ExCom) level.
- Following those discussions, and the appointment of a new Director of Parks in January 2024, a decision was taken to pause further progression of the RPTS.
- This was to enable the development of an overarching TRP Tree Strategy (now called Tree Vision), intended to provide the strategic framework for all park-level tree strategies.
- The approach requested by the Director of Parks and ExCom and agreed by the Board, was that park-level strategies would align with, and sit beneath, the overarching Tree Vision and be published alongside the individual Park Management Plans.
- The approach to create an overarching TRP Tree Strategy did not start in earnest until 2023. The approach and first draft were ratified by the Board in April 2025 where the papers said, *'The Board are invited to approve the principles of*



the draft tree strategy'. At this meeting, the Board resolved to set up a sub-committee of trustees to undertake further work to the Tree Vision.

- Accordingly, the RPTS was not taken through final governance or publication at that time. Its development was paused, pending completion of the overarching TRP Tree Vision.

- The revised TRP Tree Vision was re-submitted to the Board in June 2026 where it was approved. The RPTS has now also been reviewed and aligned with that overarching Tree Vision and is due to be published shortly. Both documents are expected to be published by 1 August 2026.

- The RPTS and TRP Tree Vision sit within a family of other plans including: The Park Management Plans (created for each Royal Park and published [Management plans | The Royal Parks](#)) as well as tree plans (to guide on the ground tree management) that will be developed over time, when each Park creates its own Tree Strategy. This hierarchy is as follows:





We recognise that this context was not set out clearly in our original response and may have caused confusion as to why there was a long delay with releasing the specific tree strategy for Richmond Park.

Scope of information held

As part of this review, we have reassessed the information held within the scope of your request.

- External correspondence: We have identified a single relevant email exchange with Natural England. This is disclosed in part, with redactions applied to personal data alongside material unrelated to the subject of your request. The review found that no other external bodies were consulted such as Historic England, as their focus is the built environment. The other stakeholders consulted in 2023 were the Friends of Richmond Park.

Material Released (names redacted under FOIA Section 40(2) – Personal information):

From: [REDACTED]

Sent: 03 April 2025 14:03

To: [REDACTED]

Subject: RE: Request to share information

Hi [REDACTED],

Thanks very much for this! [REDACTED]
[REDACTED] (Sentence redacted as out of scope, not relevant)

I also wanted to ask whether you have a copy of the Tree Strategy report in a format which is ready to share publicly? We didn't share this report last year due to it still being in draft format – I think we can reply with the same response if it's not ready.

Many thanks,

[REDACTED]

From: [REDACTED]

Sent: 03 April 2025 14:07



To: [REDACTED]

Subject: RE: Request to share information

Hi [REDACTED] – I'm afraid the RP tree strategy is still in draft. It got held up as it triggered producing a TRP wide strategy. It shouldn't be far off but not ready yet I'm afraid.

Thanks

[REDACTED]

- **Internal material:** Policy development for an overarching TRP Tree Vision primarily took place through a combination of Board and Executive papers, out of committee meetings, internal workshops and internal exchanges (both verbal and written), rather than extensive formal correspondence. Where relevant, due to mentions of RPTS, we have disclosed some material.

Internal Review – Response to your points

1. Regulation 12(4)(d) – “material in the course of completion”

You note that the Strategy was described as a “final draft” in November 2023 and argue that this weakens reliance on Regulation 12(4)(d). Not least that the RPTS was defined as ‘final draft’ in an email to Natural England in November 2023.

We accept that the document was described in those terms at that point in time. However, following the Board, ExCom and Director of Parks direction in late 2023 to develop an overarching TRP Tree Vision, the status of the RPTS changed materially.

In particular:

- it was not progressed through final governance or publication;
- it remained subject to revision to ensure consistency with the overarching strategy; and
- its completion (as with all tree strategies for each park that were or would eventually be developed) became contingent on the development and approval of the TRP Tree Vision.



- Additionally, an email in April 2025 to Natural England emphasises the point (above).

In these circumstances, and at the time of the original response, we consider that the RPTS and associated material continued to fall within the scope of Regulation 12(4)(d) as material in the course of completion.

We acknowledge that the passage of time diminishes the weight to be afforded by this exception. Now that both documents have been finalised and are pending publication, the basis for reliance on this exception is substantially reduced. Both the overarching Vision and the RPTS are now finalised and scheduled for publication by 1 August 2026.

2. Regulation 12(4)(e) – internal communications

We have reconsidered the application of Regulation 12(4)(e) to internal communications, including the “safe space” arguments advanced in the original response.

The development of the relevant strategies involved:

- multiple Executive Committee and Board papers;
- iterative drafting and review; and
- internal discussion and challenge over a prolonged period.

We consider that a proportion of internal communications continues to fall within the scope of Regulation 12(4)(e), particularly where disclosure would reveal the substance of internal deliberation during policy formulation.

However, we accept that this exception was applied too broadly in our original response. In particular:

- it does not apply to external correspondence; and
- it does not justify a blanket refusal of all information within scope.

On the former, **we have released the relevant email above.**

On the latter, **see the excerpts below from Board meeting papers and minutes to the same.**



Material Released

November 2024 – relevant extract from ExCom Tree Strategy paper

The need for this document {TRP Tree Strategy} was established during the drafting of the Richmond Park Tree Strategy in 2023 where it was found that the lack of overarching strategic guidance would have been helpful. It has been developed in 2024 alongside the preparation of the Hyde Park tree strategy. Draft outline of TRPs Tree Strategy for guidance and approval on approach to developing the strategy. It was acknowledged that individual park tree strategies would also be developed.

3. Public interest in disclosure

We recognise that there is strong public interest in disclosure of the requested information. This includes:

- the status of Richmond Park as a site of ecological importance;
- public interest in tree management and environmental impacts; and
- legitimate scrutiny of the delay in publication of the Strategy.

We further accept that, as the development process has progressed and the strategies have reached finalisation, the public interest in disclosure has increased.

This is balanced against a public interest in protecting genuinely unfinished material and maintaining the integrity of internal deliberation during policy formulation, not least to avoid confusion. However, the weight of these considerations is now significantly reduced given the imminent publication of the final documents.

4. External and stakeholder communications

You are correct that external correspondence does not fall within Regulation 12(4)(e).

We have therefore reassessed this category separately. As a result:

- the identified correspondence with Natural England is disclosed in part; and
- redactions have been limited to personal data, unrelated material, and content falling outside the scope of your request.



No further relevant external correspondence has been identified. Relevant email to Natural England is disclosed.

5. Committee and Executive material

We have identified one relevant Executive Committee discussion in October 2023.

This material confirms that:

- the RPTS was at draft stage at that time;
- there was an expectation that it would align with an emerging corporate tree strategy; and
- consideration was being given to how individual strategies would sit within a wider strategic framework.

We acknowledge that formal governance records should not automatically be characterised as draft material. Relevant extracts have therefore been disclosed where appropriate, with redactions applied in line with the EIR.

Material Released:

There is only one Executive Committee meeting where the RPTS was discussed and that took place in October 2023. This was a draft document. It explained that the RPTS sat alongside the Richmond Park Management Plan and would be incorporated into that plan in due course. It also sits alongside and would be made compatible with the TRP Tree Vision which was under development.

Excerpt from the ExCom Paper, Richmond Park Tree Strategy, October 2023:

{The Richmond Park Tree Strategy} is intended to supplement the Richmond Park Management Plan which is nearing the middle of the current cycle. It will be compatible with the corporate tree strategy which is being prepared separately. This document is designed to be the public facing document that sits alongside other TRP strategies, the next step will be to seek feedback from our statutory advisors.

It will also be influenced by the corporate tree strategy which is expected to identify areas for development across the TRP estate in future years.

1. Attached October 2023 ExCom (Richmond Park Tree Strategy)

Excerpt from Minute of ExCom meeting, October 2023, ExCom (initials redacted under Section 40(2) – Personal information):

■ introduced ■ paper.

During discussion it was agreed that the plan needed to be more succinct and include issues such as optimum tree coverage. Some of the points could be made into appendices. ■ suggested there needed to be a separate conversation about TRP's strategy landscape including how they all fitted together and the hierarchy. One solution may be that the parks related plans including tree, biodiversity, water and so on, could be absorbed into Park Management Plans. ■ agreed to reflect on this.

■ would be invited to BC on Monday 6 November to discuss further.

■ added that the Corporate Tree Strategy would need to be taken to the December Board in good shape.

There are no other ExCom meetings where the RPTS was discussed as there was a change in priorities moving to the development of the overarching TRP Tree Vision. We acknowledge that the RPTS was therefore effectively put on hold for publication from October 2023 until now. It could not be released until full deliberations had taken place on the TRP Tree Vision to ensure the two strategies were aligned and compatible. This has now taken place (June 2026) and both are set for publication.

6. Risk of misunderstanding

We accept your point that the risk of misunderstanding is not, in itself, sufficient grounds to withhold environmental information.

Our original reasoning was directed to avoiding premature disclosure of material that remained subject to change and development over time as it had not been approved by the board. We accept that this rationale should not have been applied as broadly as it was and concede that the passage of time is long (October 2023 to June 2026). However, that is the genuine truth of the length of time it has taken to deliver the final TRP Tree Vision and ratify the RPTS.

7. Partial disclosure

We accept that the original response did not sufficiently demonstrate that a document-by-document assessment had been undertaken.



As part of this review, we have:

- reassessed the material by category and content; and
- identified information suitable for disclosure in whole or in part.

Partial disclosure has therefore been made where information is complete, relevant and not otherwise exempt. Redactions apply for data protection purposes.

Material Released

In addition to the above excerpts, the following are also relevant:

December 2023, Board Meeting, TRP's Future Tree Strategy

PowerPoint presentation giving an overview of the development plan for a TRP Tree Strategy to be developed during 2024 stated:

- *To ask the Board to agree the development of a tree strategy for TRP in 2024*
- *Establish core policies through a TRP strategy and roll out individual park tree strategies aligned to park management plans*

20th November 2024, ExCom, TRP Tree Strategy stated:

Paper to ExCom on the Draft Tree Strategy (now Vision) stated:

The attached draft tree strategy is presented following direction from the Board in December 2023 and prior to presentation to the 2024 December Board meeting. It is intended to set the direction for the management of trees across the Royal Parks for the next ten years and beyond. ExCom are invited to consider the strategic objectives contained in the draft and the broad direction of the resource requirements that will follow if the strategy is adopted.

Also:

The need for this document was established during the drafting of the Richmond Park Tree Strategy in 2023 where it was found that the lack of overarching strategic guidance would have been helpful.

8. Timing



You are correct that reliance on a future publication date requires careful consideration.

In this case, the delay to publication arose from a governance decision to prioritise the development of an overarching TRP Tree Vision. Both the overarching Vision and the RPTS are now finalised and scheduled for publication by 1 August 2026.

This materially affects the balance of public interest compared to the time of the original response.

Conclusion

On reconsideration:

- Regulations 12(4)(d) and 12(4)(e) were engaged, but were applied too broadly in the original response:
- insufficient context was provided regarding the relationship between the different TRP strategies; and
- the document-by-document assessment and consideration of partial disclosure were not adequately evidenced.

We have therefore varied our original response.

We are now disclosing relevant information within scope, including:

- external correspondence with Natural England (subject to appropriate redaction); and
- extracts from governance material where disclosure is appropriate.

Given that both the TRP TreeVision and the RPTS are now finalised and due for publication by 1 August 2026, we consider that the public interest is appropriately addressed through this disclosure given the imminent publication of the final documents.

If you remain dissatisfied with the outcome of this internal review, you have the right to complain to the Information Commissioner's Office.

Yours sincerely,



Ali Jeremy

Director of Communications, Marketing and Engagement