

**TREE COMMENTS: LAND BETWEEN LARCHWOOD GLADE AND DEVONSHIRE DRIVE CAMBERLEY  
GU15 3UW**

**Application No: 20/0752**

**DATE: 02/2/2021**

**Terminology:**

Tree preservation order (TPO), root protection radius (RPR), root protection area (RPA), tree protection fencing (TPF), ground protection (GP), construction exclusion zone (CEZ), arboricultural impact assessment (AIA), tree constraints plan (TCP), arboricultural method statement (AMS), tree protection plan (TPP). British Standard 5837:2012 Trees in relation to design, demolition and construction – Recommendations (BS5837:2012).

- The area is Characterised by hilly areas, large irregular plots, winding roads/lanes, heavy vegetation and a scattering of Victorian/Edwardian buildings, this area has a semi - rural residential character
- Dense vegetation is one of the key characteristics. Large trees, hedges and dense mature vegetation give the area a dominant soft, green character. A large number of trees are protected by TPO's. In many places vegetation is of a density and stature to create green tunnels along the roads.

the proposed site for the development is what is likely a remnant of this heavily vegetated woody area.

An arboricultural report was submitted from SMW trees dated: 23<sup>rd</sup> June 2020

A significant number of trees are proposed for removal (46) which have been classified individually using the tree categorization method of BS5837. As a woodland it should be classified as either B2 or A2 as this is the most appropriate category which looks at the landscape quality as a collective rather than the individual tree. Although some trees are considered poor specimens individually the majority are considered B class trees. I consider them collectively to be important because of the contribution they make as a group to the local sylvan environment. Their loss would diminish the positive contribution the trees on the site make to the verdant and mature local landscape and trees that are present in numbers such as these would attract a higher score than they might as individuals and I consider them to fall within the B2 category of 4.5 (Table 1) of BS 5837.

- The removal of trees with inherent defects, decay or features likely to attract wildlife will inherently reduce the ecological value of this woodland.

Although the applicants have suggested that additional planting would take place (landscaping scheme) The number of trees lost to this development could not be adequately replaced through such a measure nor does the proposal provide a biodiversity net gain for the site. A detailed Woodland Management Plan is proposed and should planning permission be granted this would not mitigate the significant loss of tree coverage nor the urbanising effect to any great degree.

5.3.1 BS 5837. States that the default position should be that any new structures (including surfacing) should be located outside the minimum root protection area of trees to be retained. Due allowance and space should also be given for the future growth and maintenance of existing trees. If structures (including hard surfacing) are proposed within the root protection area of retained trees it will require an overriding justification. (5.3.1 of BS5837). The project arboriculturist would need to:

- demonstrate that the trees can remain viable,

## Annex B

- the area lost to encroachment can be compensated for elsewhere contiguous with the root protection area (RPA) and
- mitigation measures provided to improve the soil environment of the trees can be implemented.

The applicants have not provided an overriding justification for planned incursions into the RPA of protected trees and it has not been demonstrated that the trees affected by the development can remain viable, nor the area lost to encroachment can be compensated elsewhere contiguous with the RPA.

### **Utilities**

Details of the alignment of existing and proposed overhead and underground utility services including drainage and soakaways and their associated structures (e.g. manhole covers, meters, access points, vertical supports) have not been provided. With the current confines of the site it is unlikely that this can be achieved without further impact on trees. I am therefore unable to assess the impact utilities/service runs would have upon on/off-site trees.

7.7.1 of BS5837: where underground apparatus is to pass within the RPA, detailed plans showing the proposed routing should be drawn up and, in such cases, trenchless insertion methods should be used. It should, however, be established that these methods of installation are possible on this site before they are relied upon. As no plans have been provided it is impossible to tell what the likely impacts or feasibility of the installation of utilities will be.

### **Post development**

There will be a need for hard surfacing around the properties (patios/open spaces) including the rear gardens post development. The increase of hard surfacing within the trees root protection areas will have an impact on their ability to access rainwater, exchange carbon dioxide and oxygen, and assimilate micro and macronutrients within the soil, which is key to their survival.

The number of trees shown to be retained within the back gardens of these properties will make them almost unusable from an amenity stand point. Considering the size of the rear garden, the retained trees will cast a heavy semi-permanent shadow across the rear elevation and garden. This will lead to certain post development pressure to detrimentally prune or even remove trees to;

- increase amenity space,
- allow more sunlight into the buildings/gardens,
- reduce or remove any perceived over-dominance as well as fear of tree/branch failure,
- and to abate minor seasonal nuisances such as falling debris (twigs, leaves, bird droppings etc.).

Overshadowing will most likely result in a decrease of the residents' amenity and the size and proximity to the trees is likely to cause unreasonable interference with residents' prospects of enjoying their property. Garden space is an important part of a family dwelling and the amenity value of plots 1, 2 and 3 would be largely negated by the domineering presence of the retained trees as the trees are either mature or reaching full maturity.

Whilst protection afforded by the TPO would enable the Council to control any future tree work, it would be difficult to refuse an application to significantly cut-back or even remove a tree that was threatening the safety of the occupiers, or having a harmful effect on their enjoyment of the property. There can be no certainty that such pressures could be reasonably resisted. Trees protected by a TPO merit special care, and this woodland is no exception. Even with such permission the surrounding vegetation would still shade the gardens of the property such is the closeness of the site, the gardens lay east/west and there would be an expectation they would receive at least some sun during the day.

## Annex B

Where tree retention is proposed in conjunction with nearby construction, the objective should be to achieve a harmonious relationship between trees and structures that can be sustained in the long term, there should also be consideration for the future height and spread of these trees which has not been considered. 5.2.4 of BS5837: Particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development (see 4.5.11). Where such trees are retained, adequate space should be allowed for their long-term physical retention and future maintenance.

with the above in mind I consider there to be insufficient space within the site to accommodate the buildings in the position shown without resulting in an unacceptable relationship between the trees and the built development and thereby directly compromising the long-term health and retention of protected trees.

The juxtaposition between the protected trees (woodland) and the proposed dwellings is unsatisfactory and would not meet the NPPF's core planning principle Section 175 (c) of the revised NNPPF which states 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons e.g. infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat and a suitable compensation strategy exists. **The application site and planned development would not meet these criteria.**

## CONCLUSION

If the numbers of trees proposed were removed along with the foreseeable likely loss of trees post development, the amenity value of the woodland would be significantly diminished and the appearance of surrounding area would suffer as a result, this would unacceptably harm the sylvan character of the area and so overall, I therefore consider that the loss of a substantial proportion of trees would fragment the current woodland. This would have an urbanising effect and would cause significant harm to the character of the area.

Given the above and the significant loss of so many trees that are collectively considered high amenity features within the local and wider landscape the proposal fails to adequately secure the protection of important protected trees which contribute positively to the character and appearance of the area. I therefore recommend refusal of the application under policies DM9.