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My Ref: 28a Kingsway/315/20-1

12th December 2020

The Head of Planning Services
Arun District Council
Arun Civic Centre, Maltravers Road
Littlehampton, West Sussex
BN17 5LF

Dear Sirs

Ref: **Planning Applications: AW/315/20/T—OBJECTION.**
28a Kingsway, Craigweil

1. I am concerned that this arboricultural Application is not properly nor thoroughly thought out. Nor is it presented in sufficient detail to take account of recent history and building development plans now started this site.
2. First, I wish to draw attention to the importance of this treed/shrubbed 'border' at 28a and its context within the Craigweil House Conservation Area and Heritage Asset. The visual appreciation of both East and Western street-views has been noted as of primary importance by several notable reports. Firstly, Graham Steagles the Principle Historic Areas Adviser of English Heritage in his evaluation of Craigweil in preparation of the Conservation Area here, where he regrets the insertion of modern developments **eroding the original treescape/landscape** which forms an important part of the original 'park-like' design and character of the landscaped street form of Craigweil.
3. Then we have comments by Mr McHugh, HM Inspector withing his judgement in December 2014 **next door at No 24** Kingsway, where he says under para 7, "street facing boundaries...the prominent boundary treatments facing onto Kingsway...with planting, in my opinion these boundary treatments are an important and distinctive feature of the CA."
4. Further, the eminent Arboriculturist Bernie Harverson, in his Report to AW/155/17/PL clearly illustrates the importance of the established green border to the front of Brus Lodge (now 28a in part/whole), on pages 1&5 says under para 3.7 of his Report, "...and I remain firmly of the view that the site frontage trees at this location [from the eastern boundary with Brus Lodge to the boundary with 24 Kingsway] relate as an entity in the landscape and **thus should have been preserved as such in Group format** under the TPO **and not** as individual trees." In para 4.2, bullet 5, Mr.Harverson debates the classification of trees v shrubs using BS5837 grading where the phrase 'trees where retention is desirable' is used. He then highlights the fact that some Pittosporum in the border are indeed **trees and not shrubs**.
5. **Root Protection areas** are another matter not mentioned by this present Application, another omission showing the detail as **inadequate where it is known and where site clearance has already started on site. AW/155/20/PL instructs the provision of enclosure to this border with Halo fencing and I am unaware that this has been erected, although construction has commenced.**
6. **Within the Application Form** from the Agent, Section 4 acknowledges some of the proposed works are subject to a TPO, but then that he does not know the number. **It is TPO/AW/1/16 dated 4th May 2016** for his future reference. He presumably failed to research

this and has therefore taken no account of it so far. Under Section 4:1 of this/his Application, he says the condition of the 'trees' are **not diseased nor subject to break nor fall**. Also, it is stated that there is **no subsidence nor damage to drains or driveway**.

7. Also, under Section 4, the NO box is ticked saying no supportive information has been sought/included. **Yet** a separate sheet attachment does partly describe reasons.
8. **There is therefore no justifiable reason for the proposed works.**
9. Under Section 5, the agent then details the works with some qualifying reasons for the work required, negating Section 4!
10. The description refers to the agent's own 'sketch', 'identifying' the trees/shrubs covered with "T" markers. **I do not believe this identification is sufficiently accurate** to pinpoint which individual trees/shrubs within this crowded border are involved in the proposed works. **The are no measurements nor distances shown.**
11. Trees and shrubs require maintenance, but none has been carried out since 2017 to the best of my knowledge. Without such routine care, growth can get out of hand and it is therefore neglect that is partly due to the present suggested actions.
12. Very clearly, this plan is preparation for implementing **AW/155/17/PL** for which permission was granted on 13th December 2017 **which is now in progress**.
13. So, I submit that this application should be **REFUSED** and works carried out according to **the permission granted under AW/155/17/PL**. In addition, **knowing the risk** of this border being stripped completely of its existing landscape in new construction, I respectfully suggest the District's Tree Officer visit site and **label the trees/shrubs** that must be retained to ensure the Character and Appearance of the Craigweil House Conservation Area, according to the requirements of the Arun District Plan Conservation Area Policies, otherwise, why have such policies?

Yours faithfully.

Ian Jefferies