CONSULTEE RESPONSE (Council's Arboriculturist)

Date of report: 19 July 2022

Reference:	A/45/22/PL
Proposal:	Erection of 167 No new homes in a mix of 1–4-bedroom properties (2–4-bedroom homes and 1-bedroom apartments), with associated landscaping, parking, open space, play areas, construction of a new vehicular access from Golfers Lane and all other associated development works (resubmission following A/129/21/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings
Location:	Rustington Golf Centre, Golfers Lane, Angmering, BN16 4NB
Case Officer:	Mrs A Gardner

Comments on application:

I have considered this application by means of a desktop review, using the information and plans submitted as well as online resources. Previous consideration from site and familiarity with surrounding areas provides further insight to the proposal.

The applicants have employed James Blake Associates to prepare an Arboricultural Impact Assessment (AIA) along with Tree Protection Plans for this project.

The Tree Survey data is comprehensive and accords with the requirements of BS5837:2012 – Trees in relation to Design, Demolition and Construction.

Arboricultural impacts from layout proposal (Illustrative Site Layout, dwg. no. PLN-1-1102 Rev: E), supported by Tree Removal Plans, dwg. nos. JBA 20/128 TR01/1-4 incl. Rev A.

A substantial quantity of established trees is proposed for removal, identical to the plans submitted with previous application, reference A/129/21/PL. I agree that some visual mitigation would be provided by retention of S boundary trees although it is also important to secure adequate compensation for such a substantive loss of canopy and habitat, within an ambitious and detailed soft landscape plan for the site. That should include native tree species of potential stature (>15m ht.) and longevity such that they will grow to enhance the local landscape. I defer to our Leisure and Landscape Officer on such matters.

The vast majority of trees existing across the site are in good condition with either high (or future) landscape value. Notable among those are southern boundary trees of mixed species type and two large linear group of pine. It is pleasing to see most of the pine proposed for retention within the scheme and given adequate room to survive and flourish post-development, although I list the following areas of avoidable conflict/loss in the design:

- LEAP intrudes within RPA of northernmost tree of G12. This is avoidable (land available to west) and unacceptable given the proposed (justified) RPA incursion to implement arterial road and footway.

- SUDS feature (cellular soakaway) abuts RPA of G12. This is avoidable (land available to west). Buffer zone of minimum 2metres required to remove risk of construction overspill into exclusion zone.

- LAP east of G12. Mature/late-mature Monterey pine (a heavy-coned species) are not suitable components of public open space where people are invited to engage in recreational activity or remain static within 'target areas.

- I am unclear as to why there needs to be any excavation occurring either side of the 'No-dig' footway to bisect G11/G12. To do so would represent an unacceptable extent of RPA incursion and likely to be damaging to high value trees. Clarification required.

- T14. A significant landscape tree. Its relatively isolated position can be captured by understorey/peripheral planting (e.g., *Ulex europaeus* and *Betula pendula*) and next generation pine (e.g., *P. nigra / P. sylvestris*). Perhaps as part of a long-term plan to sustain the pine landscape feature and improve to a more visually attractive and ecologically interesting heathland-type habitat area.

- Proposed footway construction alongside G45 (main entrance to site) risks damaging established semi/early mature trees. Poplar trees within the group have high growth potential and may present a future risk of damage to any conventional path construction. A 'No-dig' method should be employed within the RPA of G45 to secure a successful shared outcome.

- Tree Protection Fencing around southern end of G46 (southeast corner of site) does not form an effective Construction Exclusion Zone. It should be extended west from terminus shown and preferably capture the full extent of G45 RPA also, to be

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adjusted at later date and immediately prior to installation of preferred 'No-dig' footway.

There does not appear to be an approved surface water drainage (and foul water sewer) strategy for the site. This fundamental element of the design ought to be addressed to our satisfaction in association with layout proposals, so that we are not subsequently held hostage to flood mitigation measures which could then impact heavily on retained trees/landscape plans/open space provision.

I draw attention to the nominal root protection areas (RPA) of retained trees and their growth potential as obvious constraints to the siting of any SUDS (e.g., attenuation pond) or introduction of subterranean utility apparatus. The provision of appropriate buffer/easement around such features must also take into account that growth potential (roots), to limit the risk of damage occurring during future maintenance of the same, from compaction/contamination of the soil structure.

Any improvements to existing or creation of new watercourses within the RPA of retained trees to be fully considered, details provided in advance and to our satisfaction. Where there is a significant risk of damage to those trees arising from such operations, then an alternative strategy should be proposed.

Conclusions:

The principle of development is achievable without undue detriment to retained on-site trees provided the above listed areas of conflict/loss are designed out.

There must be overriding justification for RPA incursion, not a presumption (often mistakenly) that BS5837:2012 – Trees in relation to Design, Demolition and Construction promotes activity in the RPA. It does not. It presents a range of options to consider, where such incursion is unavoidable or where no reasonable alternative exists. A layout that does not follow these principles should be resisted.

Sites of this size and generally open nature but with established landscape features (trees and hedgerow), should be subject to the higher-level development principles, as promoted in our Supplementary Planning Documents. Those give instruction for avoiding Root Protection Area (RPA) incursion and providing further insurance with the use of buffer zones (usually a minimum of 2metres to be effective). **Arun District Public Open Space, Playing Pitches and Built Facilities** (Appendix 9) and **Arun Design Guide** (E.02 Landscape Structures & Trees, p48).

The quantity of tree removal proposed across the site is significant but ultimately can be adequately compensated for within an ambitious and detailed soft landscape plan.

Recommendations:

As it stands, I am unable to lend this scheme my support and so register an **OBJECTION**.

The design team should be invited to revisit the layout (as detailed above) and present a more harmonious scheme.

The applicant should instruct their project arboriculturist to revise their Arboricultural Impact Assessment and Tree Protection Plans in support of all necessary layout and construction methodology revisions, and to submit for our consideration.

I recommend the making of a Tree Preservation Order in respect of G11, G12, G13 (our ref. G1) and G46 (our refs. G2 & G3) to preserve their place in the landscape and control future management. TEMPO forms and GIS Plans to assist with making this Order can be found here: N:\ EveryoneFolders\Mark Warwick\Angmering.Land W of Golfers Lane and N of A259

Mark Warwick
Tree Officer
Environment and Climate Change