

Planning Officer: Raymond Cole

Planning Application Ref: BN/122/19/EIS

Location: Land North of Barnham Road, Eastergate

Description of works: Scoping opinion

Comments on Application:

- I have undertaken a whole site survey of the established trees and associated green infrastructure, identifying an impressive number of *high-quality* trees (as defined by BS5837:2012 – Trees in relation to design, demolition and construction). Many of those are of exceptional landscape, ecological and visual amenity value. The latter will be more pronounced with any change in land use, while the former would come under threat of diminution. A healthy proportion of those are also potential heritage trees, arguably of veteran status and many emerging. My initial impression having evaluated their existing and current potential is that any development of the site must be appropriately informed by the need to retain these trees and allow them to reach full potential.
- Those trees will require more than just their root protection area (RPA) to remain sacrosanct in order to flourish. There is much benefit derived from cohesive root and crown growth, so any fragmentation of obvious tree groups/woodland will undoubtedly be to their detriment. I would expect the RPA (plus a 2m buffer) to be an absolute minimum requirement for high value trees. Ideally, they would be incorporated into an area of open space and be so remote from any development such that they can project ‘veteran status’ without being subject to any risk mitigation pruning works in the future.
- There is a considerable amount of trees and hedgerow about the perimeter of the site which provides valuable screening and ecological benefit. Their future growth and potential influence over any adjacent residential property should be a major consideration in designing a site layout that is sympathetic to accommodating their long-term presence especially in respect of shading, any ongoing maintenance requirements and curtailing future residential pressure to prune.
- As general principles of design, careful consideration should be given to the intended land use beneath existing canopy of established trees and the potential for further tree growth (root and crown extension). With such a large and open site to work with I would expect a layout proposal to place great emphasis on eliminating future ‘pressure to prune’ of retained trees. Furthermore, there would need to be a compelling argument in favour of any Root Protection Area incursion as this site clearly lends itself to a harmonious design that avoids any direct interference with established trees of current and future landscape value. This is especially relevant where those trees are of high amenity, landscape and potential heritage value (which qualifies them for statutory protection), as is the case here.
- Any development of this site should be supported by ambitious and adequate mitigation measures, that both recognises its current environmental value to the local area and seeks to enhance key characteristics.
- With regard to an approved drainage strategy for the site, this fundamental element of the design ought to be addressed to our satisfaction up front and in association with any 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.
- The applicants have employed WYG to prepare an Environmental Impact Assessment for this project.

Conclusions:

- The Environmental Impact Assessment is not required to make a formal evaluation of the trees, woodlands and hedgerows affected by the development proposal. An arboricultural survey is to be provided with an Environmental Statement and as part of a detailed planning application.

- A comprehensive tree survey is required, with topographical plans showing their relationship with any construction before we can adequately assess the likely impact of these proposals on the same.
- The current proposed route for the road is going to impact on significant trees both above and below ground, although we have yet to see that relationship precisely illustrated on a plan or described in detail. It does not appear to have been adequately influenced by the existing tree population, although we must await further information before a firm conclusion can be drawn. Trees of low quality and landscape value would (and will inevitably) have to be sacrificed to provide a suitable carriageway across the site, requiring mitigation but of themselves not a constraint.

Recommendations:

If this comes back in as a full and detailed application: -

1. The applicants will need to employ the services of an Arboricultural Consultant to carry out a tree survey exercise and then prepare an Arboricultural Impact Assessment (AIA) which must be inclusive of; a 'Tree Survey Schedule', a 'Root Protection Area (RPA) Schedule' and a 'Tree Constraints Plan' – with the trees accurately plotted on same.
2. In the event that a RPA of any tree which is proposed for retention overlaps the development then BS5837:2012 requires that the Detailed Planning Application is accompanied by an Arboricultural Method Statement (AMS) and also most importantly a Tree Protection Plan – to both describe and illustrate the mitigation measures which are to be employed to ensure that the trees survive without detriment to their vigour and vitality and are given adequate protection both above and below ground.

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- I recommend the making of a Tree Preservation Order in respect of 35 individual and 1 group of trees to preserve their place in the landscape and inform the proposals. I will send a link via separate email, to a folder containing the TEMPO forms and GIS plans for this purpose.

Mark Warwick
Tree Officer / Parks and Greenspace Team