

CONSULTEE RESPONSE (Council's Arboriculturist)

Date of report: 31 August 2022

Reference: FP/274/21/OUT

Proposal: Outline planning application with all matters reserved, except means of access, for the erection of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, together with the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure and the retention and re-purposing of the retained club house (F2). This site also lies within the parish of Yapton, affects a Public Right of Way and is a Departure from the Development Plan. This application is subject to an Environmental Statement

Location: Bognor Regis Golf Club, Downview Road, Felpham, PO22 8JD

Case Officer: Mr D Easton

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 FPCR Environment and Design Ltd. to prepare an Arboricultural Assessment & Method Statement along with a Tree Retention Plan for this project, although we are only considering access and the principle of development at this stage.

The Tree Survey data is comprehensive and accords with the requirements of BS5837:2012.

The Illustrative Master Plan and Land Use Parameters Plan appear uncontroversial, although the true arboricultural impact cannot be determined until our own amenity assessment of trees across the site has been undertaken (the prevalence of group classification of trees during the applicant's survey requires scrutiny). This substantial piece of work is due to be completed by the end of September 2022 and will inform my response to any subsequent detailed layout proposal.

An interim recommendation for Tree Preservation Order will follow soon after the survey work has been completed, presented to the planning team for their consideration.

Proposed removal of T15, a large (retention category A) mature oak with stem diameter of 1400mm and recorded as being in good condition and with no major defects, is unlikely to gain my support. There would have to be overriding justification for such a harmful effect on the landscape.

The site is served by a network of paths and PROW linking with surrounding areas. Long-established and large trees, both individual and as groups, offer high amenity value to those accessing the site and are dominant in the wider landscape.

It is proposed and necessary for sections of existing PROW to be enhanced to provide all year-round access through the site for a variety of users. Where the root protection area (RPA) of retained trees are bisected, consideration should be given to the realignment of those paths outside of same or a method of 'No-dig' construction must be employed to both protect the underlying soil structure (rooting area) and maintain the integrity of any newly installed hard surfaces.

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 feature, soakaway 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 preserved 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.

The introduction of new drains and swales which bisect retained tree RPAs is likely to increase the number of trees removed from what is currently proposed on plan.

Conclusions:

It is useful at this stage to have an Illustrative Masterplan and broadly complementary Tree Retention Plan from which to identify any obvious areas for improvement with layout.

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 (typically RPA +2metres to be effective). This is to ensure adequate room for any construction or other working alongside the RPA and account for any topographical margin of error during survey – thus removing the risk of any activity spilling over into the RPA and demanding a reduction in the Construction Exclusion Zone (RPA). **Arun District Public Open Space, Playing Pitches and Built Facilities** (Appendix 9) and **Arun Design Guide** (E.02 Landscape Structures & Trees, p48) - [Supplementary Planning Documents \(SPDs\) and other guidance | Arun District Council](#).

I see no reason to object to these outline proposals on arboricultural grounds but caution against approving any parameter or tree retention plan until we have concluded our own amenity assessment of trees across the site.

Please consider my attendance at any Advisory Group Meeting, if you think I can assist with highlighting important tree constraints on layout.

Recommendation:

As it stands, I see no reason to object to these proposals on arboricultural grounds.

If this comes back in as a full and detailed application it will need to be supported by an **Arboricultural Impact Assessment and Method Statement Report** inclusive of **Tree Protection Plans** defining which trees are to be retained and which trees are to be removed and how they would propose to protect the retained trees and if necessary mitigate any adverse impact on the root systems of these trees – thus complying with the recommendations of BS5837:2012 – Trees In Relation to Construction.

Mark Warwick

Tree Officer

Environment and Climate Change