

Planning Officer: Raymond Cole

Planning Application Ref: P/24/20/RES

Location: Land North of Sefter Road & 80 Rose Green Road, Pagham

Description of works: Approval of Reserved Matters pursuant to condition 1 (Reserved Matters details), condition 6 (Design Code Masterplan) and condition 7 (landscaping and layout details) following the approval of Outline planning permission P/134/16/OUT for the erection of 280 dwellings, (including affordable homes), replacement scout hut & Ambulance Community Response Post Facility; provision of a primary vehicular access from Sefter Road; demolition of No. 80 Rose Green Road & creation of a pedestrian & emergency only access; provision of Public Open Spaces including associated children's play areas, landscaping, drainage & earthworks. This application also lies within the parish of Aldwick. This site falls within the Pagham North SD2, CIL Zone 1 (Zero Rated).

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. I previously surveyed the site for trees back in August 2018 (potential TPO survey).
- There are significant trees around the site, many worthy of retention and some of which enjoy statutory protection TPO/P/4/19. They could be adversely affected by these proposals. There is no supporting arboricultural information submitted with the application - a requirement of BS5837:2012. As such, were this application to now proceed, we will not have sufficient information to guarantee such trees would be adequately respected and protected.
- With reference to the Block Plan/Planning Layout, dwg.no. CB_84_139_001 I am encouraged by the use of landscape buffer zones/open space provision which appear to provide adequate room for the majority of highest value trees and hedgerow to flourish and exploit their potential. That said, I am mindful of comments already made by our drainage engineer and visibly apparent lack of greenspace connectivity through the site. Important recommendations from our landscape and recreation officers may further demand some adjustment of the greenspace as proposed. As such, I take the opportunity to set out a few design principles of my own in respect of trees, to be considered during any revision of the same:
 - *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 'residential pressure to prune' of retained trees.*
 - *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 there are relatively few established trees of moderate-high quality, as is the case here.*
 - *A number of mature native trees of considerable landscape and ecological value have already been made the subject of a Tree Preservation Order. Those trees should be incorporated into open space or landscape buffer zone and clearly visible to those travelling through the development. I would expect the root protection area (plus a 2m buffer) to be an absolute minimum requirement for such trees. Ideally, they should be incorporated into an area so remote from any development such that they can ultimately project veteran status without being subject to any risk mitigation pruning works in the future – thus exploiting and preserving their landscape and ecological potential.*
- An Arboricultural Report (Tree Survey and Arboricultural Impact Assessment) was prepared by Ian Keen Limited, December 2016 in support of P/134/16/OUT on behalf of the same applicant. The tree survey undertaken during July 2016 is more than 2 years old, generally regarded as a threshold beyond which any condition ratings and management recommendations may no longer be valid. The survey and report (AIA) will need to be updated so that we can better understand the recent history of tree management across the site, current value of existing green assets (trees and hedgerow) and likely impact of this proposal.

- There does not appear to be an approved surface water drainage 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/open space provision/landscape plans. 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.
- Insufficient regard to existing and potential growth of trees (the subject of Tree Preservation Order) from the siting of SuDS ponds 2, 4 & 5 and the location of attenuation tank. These will need to be tweaked slightly to allow for min. 3m easement outside of RPAs (plus 2m buffer zone) or relocated within the site.
- Any improvements to existing or creation of new watercourses (e.g. anti-tank ditch) 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.

Conclusions:

- The principle of development as described is certainly achievable without undue detriment to retained on and off-site trees, although we are yet to have sight of the necessary arboricultural reports and plans to demonstrate this has been adequately considered.
- At the very least, for such a Reserved Matters application we should have sight of a detailed tree survey with those accurately plotted on a topographical map and with the proposed site layout imposed (Tree Retention and Protection Plan(s) – so we can understand the relationship between green infrastructure and built form, and identify any significant constraints or negative impacts associated with the development proposal.

Recommendations:

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

Mark Warwick
Tree Officer / Parks and Greenspace Team