

Planning Officer: Mr S Davis

Planning Application Ref: WA/98/21/PL

Location: Brookview Nursery, Eastergate Lane, Walberton, BN18 0BA

Description of works: Removal of outdoor storage, including caravan and polytunnels and the erection of 7no. units comprising of 12 offices and 3 workshops, associated parking, drainage and turning spaces (resubmission following WA/58/21/PL). This site is in CIL Zone 3 (Zero Rated) as other development

Comments on Application:

- The applicants have employed Lizard Landscape Design Ltd. to prepare an Arboricultural Impact Assessment & Method Statement (AIA/MS) along with Tree Retention and Protection Plans (TRPP) for this project.
- The Tree Survey data is comprehensive and accords with the requirements of BS5837:2012. I am broadly in agreement with the retention category ratings.
- There is a notable discrepancy between the submitted TRPP3 and report-based intentions for T13 oak. The plan is annotated with an instruction to remove, yet there is no statement to that effect within the AIA/MS.
- There are significant on and off-site trees, which by virtue of their size alone possess high landscape value. They are concentrated in the southern half of the site and along the west and south boundaries. Their long-term retention (and succession) is desirable from both a visual amenity and ecological perspective.
- Current activity and position of outbuildings is largely focused outside of higher value trees' nominal root protection areas (RPAs). From site entrance heading South to in line with TG03 the ground surface is concrete. From there onward until in line with T09 the ground surface is compacted stone (MOT Type 1 or similar). Thereafter the ground is largely undisturbed and given over to grass.
- It is stated within the AIA/MS (paras. 2.8-2.9) that '*tree locations are indicative*' and '*the exact locations of the new units and landscaping are impossible to ascertain precisely at this time*'. This is followed by the suggestion that onsite contractors should confirm the exact locations and determine whether mitigation measures are required.
This is unacceptable lack of detail and does not meet the requirements of BS5837:2012. A topographical map should be available to the project arboriculturist so they can comprehensively evaluate and instruct any mitigation measures with confidence.
- While the use of circular nominal RPAs is acceptable, it is also important to recognise that root morphology may have been influenced by land drains such that a greater proportion of tree roots could be found within the site. As such, we should adopt a more precautionary approach to RPA incursion, which could be more extensive than illustrated.
- The current proposal promotes substantial and potentially damaging activity within the RPA of the vast majority of retained trees.
- I am not confident that the proposed arboricultural supervision (AIA/MS, para.2.17) would be effective in ensuring adequate mitigation against potentially damaging excavation of existing surfaces and installation of new foundations/utility apparatus within the RPA of higher value (Category A and B) trees. Where it is foreseeable that substantial amounts of root material would be encountered during such activity, an alternative layout should be pursued. To do otherwise represents a *fait accompli* with likely damage occurring to retained trees.
- There ought to be an 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 offers a range of mitigation measures that could be employed, where such incursion is unavoidable, or no reasonable alternative exists.

- There is no approved surface water drainage (and foul water sewer) strategy for the site. Ideally, 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 and 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 (eg. 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.
- Enhancement of surface water drainage features may be required if preferred methods of infiltration cannot be employed and service-runs in and out of site have not been shown. As such, there remains a high probability of further root protection area incursion to satisfy those requirements.
- Any improvements to existing or creation of new watercourses within the RPA of retained trees should be fully considered up front, with 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 a surface water attenuation pond within the RPA of T14 is an unacceptable intrusion on the tree and could jeopardise long-term integrity of that SUDS feature.

Conclusions:

- There is an unacceptable lack of detail in the proposed layout, such that we cannot adequately assess the impact of the proposals on retained trees nor control the extent of same were this application to be approved in current form.
- The general 'principle of development' as described is achievable without undue detriment to retained trees, but it requires a more sympathetic and less intrusive layout. I suggest the applicant be encouraged to draw buildings away from South and West boundaries, exploiting the centre of the site so that RPAs are left largely inviolate.
- I believe the vulnerability of trees and hedges to damage during the demolition and construction phase (however well-intentioned the scheme of tree protection) and the potential for longer-term pressures from increased ground compaction over tree root systems and a 'pressure to prune' - collectively present a risk to the enduring character of the area, in part defined by the presence of hedges and large mature trees, most notable along the site's western and southern boundary.

Recommendations:

- As it stands, I am unable to lend this scheme my support and so register an **OBJECTION**.
- I recommend the making of a Tree Preservation Order in respect of **T02, T07, T09, T10 & T14** to preserve their place in the landscape and hopefully better inform a revised layout. I will forward TEMPO forms and a GIS plan separately.

Mark Warwick
Tree Officer / Parks and Greenspace Team