

APPEAL STATEMENT REPORT OF

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Specialist Field:

Arboriculture, Tree Failure, Hazard Evaluation, Risk Assessment, Planning, Aviation

On Behalf of:

Hilton and Wallace Ltd

On Instructions of:

Mr V Patel

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Subject:

Appeal against Refusal of consent for planning application reference

73450/APP/2023/431

For; "Erection of a building for the use as a day nursery/pre-school, providing childcare and education for children age 0-4 years"

at

Land At Corner Of Fore Street & High Road, Eastcote, Pinner, HA5 2ET

By

London Borough of Hillingdon



**ENVIROARB
SOLUTIONS**

28th March 2024

EAS-062.2024

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LEGISLATION AND APPEAL STATUS

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING (TREES) REGULATIONS 1999

APPEAL AGAINST LONDON BOROUGH HILLINGDON COUNCIL FOR REFUSAL OF PLANNING CONSENT FOR:

“Erection of a building for the use as a day nursery/pre-school, providing childcare and education for children age 0-4 years”

AT :

Land At Corner Of Fore Street & High Road, Eastcote, Pinner, HA5 2ET

1.0 INTRODUCTION

1.1 Brief - This appeal statement was commissioned by Hilton and Wallace Ltd, the client Architects / Planners acting on behalf of the Client, Mr V Patel. We have been asked to identify any arboricultural issues that arise in this case, to carry out a technical investigation, including desktop study and site visit (if necessary) and to express our opinion with respect to matters within our expert field that materially influence the dispute under review.

1.2 Background

1.2.1 This report deals with the appeal against London Borough of Hillingdon Councils (LBH) refusal of planning consent and the impact of this on our client.

1.2.2 This matter is one associated with the retention, removal and / or protection of trees located within the red line boundary of the subject planning application site.

1.2.3 The subject appeal trees are located upon land that lies within Eastcote Village Conservation Area with 17 individual trees on site protected by a Tree Preservation Order (TPO) Ref Number: Ruislip-Northwood TPO/ No.7 / 1964. The TPO identifies both individual trees and groups of trees on the subject site, albeit these are mainly located on the site boundaries.

1.0 INTRODUCTION (Continued)

1.3 Conflict of Interest

We hereby state that to our knowledge we have no connection with any of the parties, witnesses or advisers, involved in this case.

1.4 Landscape Assessment

1.4.1 The site is a vacant site situated on the corner of Fore Street and High Road, Eastcote. It lies behind a small area of public open space and is bound by the river Pinn to the Northwest and the petrol station at Eastcote to the Northeast. The site perimeter contains multiple trees and vegetation which screen the site from public view. The site is private brownfield land and has never been in public use. The site area is predominantly residential in character, with the exception of a small local shopping parade located approximately 150m Northeast along the high road, a petrol station and the Black Horse Public House (Grade II listed).

1.4.2 The centre of the site is bare ground with tree and scrub vegetation around the site boundaries. The immediate and distant landscape character is sub-urban residential; however, the site is some distance away from other residential properties and the site is heavily screened with vegetation. Accordingly, it is considered that there would be no adverse impact on the surrounding residential amenity. The topography of the site is mostly level.

1.4.3 The tree cover on the site as originally surveyed in 2020 and 2022 totalled 41 individual trees and 6 tree groups surveyed on-site or immediately adjacent to the site boundary. The most common tree species on site were Oak, Alder, Ash, Cherry, False Acacia, Holly, Field Maple and Wild Plum.

1.4.4 Prior to the most recent application following an initial tree survey undertaken in September 2020 8 TPO trees were found to be so dead / dangerous that they were removed from the site under an (confirmed) exemption due to their Hazard condition, London Borough of Hillingdon Council reference ENF/715/20. These trees were replaced under a tree replanting condition.

1.0 INTRODUCTION (Continued)

1.5 Issues to be Addressed

- 1.5.1** The tree related 'Schedule of Reasons' Reason No. 5, from the Refusal Notice
- 1.5.2** The evidence for the tree related reason of refusal – Layout design contrary to relevant Planning Policies.
- 1.5.3** The evidence for the tree related reason of refusal No. 5 – Tree removals and tree replacement
- 1.5.4** The evidence for the tree related reason of refusal No. 5 – 'Pressure To Prune'.
- 1.5.5** The evidence for the tree related reason of refusal No. 5 – Encroachment into the Root Protection Areas (RPA) of retained TPO trees T9 & T13.

1.6 References

- 1.6.1** EAS-062v3 - Fore st & High rd - AIA Tree Report - 17.01.23 - with Plans – By Enviroarb Solutions Ltd – Dated 17th January 2023
- 1.6.2** London Borough Hillingdon – Refusal Of Planning Permission – Ref. 73450/APP/2023/431 – dated 15th February 2024
- 1.6.3** Report of the Head of Development Management and Building Control – Ref. 73450/APP/2023/43 – 06/02/2024
- 1.6.4** Relevant tree related planning policies; National Planning Policy Framework (2023), Policy G7 of the London Plan (2021), and Policies DMHB 4, DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020)

2.0 THE APPEAL ISSUES

2.1 The tree related ‘Schedule of Reasons’ from the Refusal Notice - Reasons for refusal No. 5

“The application has failed to justify the need for the layout of development which is likely to result in harm to protected trees, including but not limited to trees T13 and T9 which are category A and B value trees. The application fails to demonstrate that these trees would be protected and retained in the long term. Accordingly, the development could result in adverse and irreversible impacts to landscaping, trees, biodiversity or other natural features of merit, detrimental to the visual amenities of the area and Eastcote Village Conservation Area, contrary to paragraph 136 of the National Planning Policy Framework (2023), Policy G7 of the London Plan (2021), and Policies DMHB 4, DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020)

2.1.1 The tree related reasons can be broken down into three parts;

- *“the layout of development which is likely to result in harm to protected trees, including but not limited to trees T13 and T9 which are category A and B value trees.”*
- *“The application fails to demonstrate that these trees would be protected and retained in the long term.”*
- *“the development could result in adverse and irreversible impacts to landscaping, trees, biodiversity or other natural features of merit, detrimental to the visual amenities of the area and Eastcote Village Conservation Area, contrary to;*
 - *paragraph 136 of the National Planning Policy Framework (2023)*
 - *Policy G7 of the London Plan (2021)*
 - *Policies DMHB 4, DMHB 11, DMHB 12 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020)*

2.1.2 These three elements of the tree related reason of refusal in turn can be broken down into the three arboricultural mitigating factors:

- Encroachment into Root Protection Areas (RPAs) of T9 & T13
- ‘Pressure To Prune’
- Objections to Tree Removal

2.0 THE APPEAL ISSUES (Continued)

2.2 The evidence for the tree related reason of refusal – Planning Policies

2.2.1 The planning policies and guidance used as references and the basis of the tree related reason for refusal, as stated at 2.1.1 and as described within the Report of the Head of Development Management and Building Control – Ref. 73450/APP/2023/43 – 06/02/2024 are:

- Policy G1 of the London Plan (2021) states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.
- Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) also require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure. Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.
- The application site adjoins the Blue-Ribbon Network and is subject to Policy DMEI 6 of the Hillingdon Local Plan: Part 2 (2020) which requires that such developments incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.

2.2.2 Policy DMHB 11 - of the Hillingdon Local Plan: Part 2 (2020) is fulfilled because of the tree planting already undertaken, coupled with the enhancement of the trees through the proposed landscaping and biodiversity net benefits (see below):

Policy DMHB 11: Design of New Development

v) *landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.*

2.2.3 Probably the most applicable of this which directly relates to trees and development is Planning policy DMHB 14 – Trees & landscaping of the Hillingdon Local Plan: Part 2 (2020).

2.0 THE APPEAL ISSUES (Continued)

Policy DMHB 14: Trees and Landscaping

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and

amenity particularly in areas deficient in green infrastructure.

C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.

D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

2.2.4 It is our understanding that all four parts to this policy are fully complied with:

- A) – All trees of 'merit' are retained and protected as part of the development with only 10 poor BS5837:2012 'U' category and 'C' category trees recommended for removal and replacement.
- B) A full and detailed landscaping scheme has been submitted with the planning application.
- C) Even though ground level tree and shrub planting is being undertaken, a 'Green Roof' to the building is also proposed.
- D) An accurate tree survey has been produced in both 2020 and 2022. We would categorise trees of 'merit' as 'B' and 'A' category trees under the BS5837:2012 system of amenity categorisation. All these are fully detailed to be retained and protected. All trees scheduled to be removed, mainly for arboricultural poor conditional reasons, are scheduled to be replaced as part of the landscaping scheme for the site.

2.0 THE APPEAL ISSUES (Continued)

2.2.5 Paragraph 136 of the National Planning Policy Framework (2023) states;

136. Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

2.2.6 Again, it is our understanding that by the provision of the landscaping scheme for the site and the detailed tree survey and Arboricultural Impact Assessment Report including Tree Protection Plans and Arboricultural Protection Method Statements, this paragraph from the NPPF is fully complied with.

2.2.7 Policy G7 Trees and woodlands of the London Plan (2021) states that:

A - London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

B - In their Development Plans, boroughs should:

1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site

2) identify opportunities for tree planting in strategic locations.

2.0 THE APPEAL ISSUES (Continued)

C - Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

- 2.2.8** In terms of veteran trees on site we would, using industry definitions, classify two trees as having veteran status on the site; T8 – Oak with a DBH of 1100mm and T13 Oak – with a DBH of 1230mm, the better condition of the two trees classified as ‘A’ category. Two other trees we would describe as ‘potential’ veterans; T9 – Oak – DBH of 680mm and T12 Oak – DBH of 720mm. Currently our understanding of such current ‘guidance’ is, that is what it currently is, guidance. The NPPF begins its advisory with “This is the Natural England and Forestry Commission ‘standing advice’ for ancient woodland, ancient trees and veteran trees. It is a material planning consideration for local planning authorities (LPAs).” It goes on to say; “*You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees.*”
- 2.2.9** The NPPF guidance goes on to state that where LPAs decide to grant planning permission, even though no loss or deterioration of the subject veteran trees is likely, planning conditions or obligations should be used to make sure the developer avoids damage and has mitigation protocols in place to guard against the potential for any damage, including compensation for loss or damage (used as a last resort).
- 2.2.10** It is not the intention of the client, neither will it be the result of this development, that the veteran or potential tree status of T8, T9, T12 and T13 will either deteriorate or be lost as a result of the development proposal. The root protection areas (RPA) recommended in the AIA tree report, including the RPA’s, are in line with the current edition of BS5837:2012, which is the industry best practice guidance document for tree protection on development sites.

2.0 THE APPEAL ISSUES (Continued)

2.2.11 The very definition for a veteran tree is not completely precise as various criteria may determine the veteran status of an individual tree when compared to others. The Forestry Commission suggests that; “ *a tree may be regarded as a veteran due to great age; great age relative to others of the same species, existing in an ancient stage of life or due to its biological, aesthetic or cultural interest*”. The fact that the NPPF states that “*A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing.*”, is seemingly contradictory when such veteran tree features are also described as tree hazard defects in terms of tree hazard assessment when managing trees in high-risk zones for Health & Safety.

2.2.12 **Policy DMEI 6 - Development in Green Edge Locations - of the Hillingdon Local Plan: Part 2 (2020) states that: “*New development adjacent to the Green Belt, Metropolitan Open Land, Green Chains, Sites of Importance for Nature Conservation, Nature Reserves, countryside, green spaces or the Blue Ribbon Network should incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries.*”**

2.2.13 As the application site adjoins the Blue-Ribbon Network it therefore is subject to this policy which essentially requires that such developments incorporate proposals to assimilate development into the surrounding area by the use of extensive peripheral landscaping to site boundaries. As previously stated, the site is subject to a detailed landscape plan which we feel address's this policy requirement.

2.2.14 **DMHB 4 - Conservation Areas - of the Hillingdon Local Plan: Part 2 (2020). The most application part that most likely applies to trees is:**

B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.

2.0 THE APPEAL ISSUES (Continued)

2.2.15 Given the only loss of trees recommended is for predominantly arboricultural and / or Health & Safety reasons and that replacements have already been made for the 9 hazard trees felled and that further and all other tree removals will be fully mitigated by implementation of the detailed landscape plan submitted, we feel that the tree related element of this policy is also fully complied with.

2.3 The evidence for the tree related reason of refusal – Tree removals and tree replacement

2.3.1 In relation to inferred 'loss of amenity' resulting from the proposed felling of trees due to the refused development, it should be noted that of the 10 individual trees proposed to be removed on this site, all 10 are due to their poor or dead / dying condition being 'U' category trees. Of the remaining trees proposed to be felled, only TG1 - A mixed species scrub group in the centre of the site comprising of; Hawthorn, Birch, Sweet Chestnut, Ash is recommended to be felled. It was described as poor form, shape and condition self-sown trees. With sparse crowns showing signs of stress with crown retrenchment and major deadwood. There was X1 dead standing tree in the group.

2.3.2 Every effort has been made to reduce the number of trees required to be removed from the site, specifically in relation to any perceived conflict with the current now refused development proposals for the day nursery/pre-school. All the tree felling works are to remove declining, recently un-managed tree stock on and within the site and site perimeter boundaries for health & safety reasons. These are of low individual landscape significance and can be adequately mitigated as part of the overall landscaping and new tree planting of the site.

2.0 THE APPEAL ISSUES (Continued)

2.4 The evidence for the tree related reason of refusal –

2.4.1 The tree related reason for refusal No. 5 describes two elements of refusal as:

- *“the layout of development which is likely to result in harm to protected trees, including but not limited to trees T13 and T9 which are category A and B value trees.”*
- *“The application fails to demonstrate that these trees would be protected and retained in the long term.”*

2.4.2 To seek more detail into these refusal elements we have reverted back to the **‘Report of the Head of Development Management and Building Control’ – Ref. 73450/APP/2023/43 – dated 06/02/2024**. Within this report further explanation on these two refusal elements are described at Section 7. **MAIN PLANNING ISSUE**, sub-section 7.6 - **OTHER ISSUES – Trees & Landscaping**. We have responded to these comments as follows.

2.4.3 Encroachment into Root Protection Areas (RPAs) of T9 & T13

Point 1 - “construction of a pedestrian foot path and new bus stop within the root protection areas (RPAs) of retained trees T13 & T9.”

Point 2 - “concerns are raised with regards to the proposed location of the play area, bus stop and corresponding footpath into the site and their proximity to trees T13 and T9 which would be within the RPAs.”

Point 3 - “However, neither the play area or bus stop needs to result in any potential harm to trees T9 and T13. It is considered that encroachment into the RPAs is avoidable and unnecessary.”

2.4.4 All three points as detailed are the same issue repeated – construction / encroachment within or adjacent to the RPAs of retained trees, specifically T9 & T13. By condition (usually) Arboricultural Protection Method Statements can detail specific protections and supervision by the project arboricultural consultant required for the installation of 3D ‘no-dig’ cellular confinement webbing sub-bases for footpaths / play areas (only 75mm required) and car parking (usually 100-150mm required).

2.0 THE APPEAL ISSUES (Continued)

- 2.4.5** Our APM 7 - Installing Hard Surfacing - Tree Root Protection within RPAs, describes the practical requirements for installing new permeable hard surfacing and upgrading existing surfacing where with RPAs, based on the recommendations in BS 5837:2012 (7.4) and more recently APN 12 – ‘The use of cellular confinement systems near trees – A guide to good practice’ – Ben Rose – Arboricultural Association 2020 – See Appendix 2.
- 2.4.6** *Point 4 – “Landscape Masterplan shows the understorey of planting along High Road will be replaced with a hedge with the addition of a bow-top railing. The informality of the existing tree understorey belt is an important green feature that is a characteristic of the Conservation Area. Replacing this green feature with formal hedgerow and railing is likely to impact the existing trees as it will require digging and railing footings within the RPAs. Again, such encroachment is avoidable and unnecessary.”*
- 2.4.7** This is easily mitigated by hand digging all fence posts under Arb supervision as detailed within the applicable Arboricultural Protection Method statement and only planting informal native hedging to augment and enrich that existing hedging which is already in-situ – See APM 3 – soft landscaping within RPAs, at Appendix 3
- 2.4.8** The submitted landscape plan already specifies native tree hedging and the plan demonstrates we are retaining as much existing vegetation as possible and will not remove any unless necessary. Full details can be specified by condition in the usual way. The site needs secure metal fencing for security reasons as it is proposed to be a children’s nursery / pre-school.
- 2.4.9** *Point 5 – “Even if sufficient information could be provided to demonstrate that the trees could be protected [which it has], given the very close proximity between the tree canopy and the development, it is likely that the Council would face pressure from the development to prune the trees. It is possible that the more regular pruning of such trees could result in their premature loss.”*

2.0 THE APPEAL ISSUES (Continued)

2.4.10 Specifically in relation to the two subject trees; T9 is an existing roadside Oak tree already managed due to its proximity to and overhanging the high-risk zone public highway. This wouldn't change either as part of the development proposal or due to the requirement to manage a mature tree within falling distance of the highway, as required under the Highways Act 1980: s.154 ***“Cutting or felling etc. trees etc. that overhang or are a danger to roads or footpaths (1)Where a hedge, tree or shrub overhangs a highway or any other road or footpath to which the public has access so as to endanger or obstruct the passage of vehicles or pedestrians, or obstructs or interferes with the view of drivers of vehicles or the light from a public lamp, or overhangs a highway so as to endanger or obstruct the passage of horse-riders, a competent authority may, by notice either to the owner of the hedge, tree or shrub or to the occupier of the land on which it is growing, require him within 14 days from the date of service of the notice so to lop or cut it as to remove the cause of the danger, obstruction or interference”***

2.4.11 T9 – Oak's current treeworks recommendations, as detailed in the Treeworks schedule of the submitted AIA tree report at Appendix 5 states; *“Remove dead wood. Remove basal vegetation and re-inspect root crown. Sever Ivy at 2m from ground level and remove section. Prune epicormic growth to 4m. Crown lift to 6m over highway”*.

2.4.11 T13 – Oak requires minimal treeworks and, again as described in the submitted AIA tree report, may need a crown lift / basal epicormic growth and major deadwood removed but this is hardly pruning such as would reduce the life expectancy of the tree.

2.4.12 Point 6 – *“The application has failed to justify the need for the layout of development which could result in harm to protected trees, including but not limited to trees T13 and T9 which are category A and B value trees. The application also fails to demonstrate that these trees would be protected and retained in the long term.”*

2.4.13 We feel that this summary at the end of the Officer report is just factually incorrect when considering the detailed tree protections described within the submitted AIA tree report and those detailed construction Arboricultural Protection Methods that would be submitted in support of a detailed Site-Specific Arboricultural Method Statement, usually requested by condition, as and when construction site detail becomes available.

3.0 CONCLUSIONS

- 3.1** The subject property is located at Land at Corner of Fore Street & High Road, Eastcote, Pinner, HA5 2ET and is the subject of an Appeal against Refusal of consent for planning application reference 73450/APP/2023/431, for the *“Erection of a building for the use as a day nursery/pre-school, providing childcare and education for children age 0-4 years”*
- 3.2** This appeal statement was commissioned by Hilton and Wallace Ltd, the client Architects / Planners acting on behalf of the Client, Mr V Patel. We have sought to identify the arboricultural issues that arise in this case, carrying out a forensic investigation of the facts, including desktop study and to express our opinion with respect to matters within our expert field that materially influence the dispute under review.
- 3.3** This report deals with the appeal against London Borough of Hillingdon Councils (LBH) refusal of planning consent and the impact of this on our client and is one associated with the retention, removal and / or protection of trees located within the red line boundary of the subject planning application site.
- 3.4** The now refused development proposal retains all the good condition and veteran trees, with only 10 individual trees proposed to be removed all of which are described as ‘U’ category trees due to their poor or dead / dying condition. No trees are required to be removed to facilitate the proposed development.
- 3.5** The proposed layout allows for the planting of many new trees and shrubs and the management of tree groups to allow improved screening into and from the site. The importance of the landscape setting is fully recognised and will be maintained, with a detailed scheme of landscaping and enrichment of the site boundary features, both internally and along the main road boundaries, proposed to enhance the landscape setting and preserve the current treescape. It is expected that this requirement would be conditioned.

3.0 CONCLUSIONS (continued)

- 3.6** Much has been made of the protection of and potential harm to retained and or potential veteran 'A' & 'B' category trees on site, specifically T9 and T13, both proximal to the proposed development. However, such status must be cognoscente of the existing High-Risk Zones and occupancy of the site, adjacent to busy highways, where any disease or defect of a given tree within such a zone is a factor for mitigation on health & safety grounds. This contradiction when managing veteran trees is why experienced arboriculturists are required when advising and managing any construction works on development sites, such as is described within the APMS and tree reports and plans contained within the supporting documents of the submitted Arboricultural Impact Assessment Report, dated January 2023.
- 3.7** For all of the above reasons we respectfully request that the Inspector appointed by the Secretary of State supports the appeal against the tree related 'Schedule of Reasons' from the Refusal Notice - Reasons for refusal No 5.



Paul Allen MICFor Dip Arb (RFS) MarborA
Consultant Arboriculturist
28th March 2024

APPENDICES

- Appendix 1 - Tree Protection Plan showing location of the subject appeal tree's.
- Appendix 2 - EAS APM 7 - Installing Hard Surfacing - Tree Root Protection within RPAs
- Appendix 3 - EAS APM 6 - Soft Landscaping within RPAs
- Appendix 4 - Report Caveats

APPENDIX 1 - TREE PROTECTION PLAN



APPENDIX 2 - EAS APM 7 - Installing Hard Surfacing - Tree Root Protection within RPAs



**Arboricultural Protection Method 7 - Installing Hard Surfacing -
Tree Root Protection within RPAs**



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APM 7 – Installing Hard Surfacing - Tree Root Protection within RPAs

1.0 INTRODUCTION:

- 1.1 Wilful damage to protected trees is a criminal offence and could lead to enforcement action, a fine, a prison sentence or both.
- 1.2 Work on site should be undertaken under the normal site risk assessment procedures and comply with the wider site health & safety rules.
- 1.3 All site operatives entering root protection areas (RPAs) should be fully briefed as part of the toolbox talk by the supervising arboriculturist before work starts.

2.0 OTHER RELEVANT APMs:

- 2.1 APM 1 - Tree Protection – Fencing
- 2.2 APM 2 - Tree Protection – Temporary Ground Protection – To design temporary access to avoid soil compaction
- 2.3 APM 3 - Site Monitoring - Site Inspections & Supervision – To monitor all works within RPAs by the supervising arboriculturist
- 2.4 APM 4 - Contamination / Pollution - To follow this guidance if concrete is poured within or near RPAs.
- 2.5 APM 5 – Demolition of structures & surfacing within RPAs – if applicable
- 2.6 APM 8 - Excavations within RPAs - Minimise excavation into original undisturbed soil if existing surfacing is to be removed before installing new surfacing.
- 2.7 APM 10 – Construction within RPAs - Follow this guidance, if the surfacing is to be installed on supports, i.e. piles, pads, or posts.

3.0 REMINDERS:

- 3.1 For ground without existing surfacing, remove any loose material at the soil surface by hand and do not excavate into existing soil levels unless approved by the supervising arboriculturist.
- 3.2 For ground with a vegetation layer, excavations may be appropriate to remove the turf layer and surface vegetation, but this must be agreed by the supervising arboriculturist.

- | | |
|-----|--|
| 3.3 | All new surfacing must be set back from trunks and buttress roots by at least 50 cm, unless otherwise agreed by the supervising arboriculturist. |
| 3.4 | Fill low points on undulating surfaces to an even level with any high points using the same agreed 'no-fines' granular fill material used to fill the cells. |
| 3.5 | Do not mechanically compact new fill or existing soil with heavy rollers. Tracking over the filled cells during installation is usually sufficient to sufficiently expand the 3D cellular panels, in accordance with the manufacturer's instructions. |
| 3.6 | Where a three-dimensional cellular confinement system is used, install it according to the manufacturer's technical specification. Note: The cellular fill must be clean washed angular stone with no fines, as specified by the manufacturer, 4-20mm clean angular stone, as below: |

Greenfix
 Soil Consolidation and
 Driveway Surface Specialists

info@greenfix.co.uk | tel: 01800 666 027 | www.greenfix.co.uk

Clean Angular Stone 4-20mm

(Ideal Material for Geoweb Tree Root Protection)

Specification for open graded HR material for Geoweb cellular confinement within tree root protection applications. The specification aims to ensure high ratio sand spaces which corresponds with ideal soil void ratios for tree root health.

Material to BS EN 12642 or BS EN 12620. Clean, sound, non-flammable crushed rock with well defined edges – not round.

Properties of material	Test	Value
Grading of particle size	BS EN 12642	Grading 4-20mm
Fines Content	BS EN 12642	0%
Shape Retention Index	BS EN 12642	>120
Resistance to Fragmentation	BS EN 12642	A30
Resistance to wear	BS EN 12642	MDS20
Water absorption rate BS EN 1067-6:2000 clause 7	BS EN 12642	max 14%
For typical Wt% 2% magnesium sulphate soundness	BS EN 12642	M510
Acid soluble sulphate content air-cooled blast furnace slag	BS EN 12642	ASL1
Acid soluble sulphate content non air-cooled blast furnace slag	BS EN 12642	ASL2
Total sulphur aggregates other than air cooled blast furnace slag	BS EN 12642	<1% by mass
Total sulphur air cooled blast furnace slag	BS EN 12642	<2% by mass

Stone Size mm	Percentage of 4-20mm passing
40	100
21.5	98 - 100
20	90 - 99
10	25 - 70
4	0 - 15
2	0 - 5
1	-

Where decorative gravel is being used as the final surface wearing layer it is very important to ensure angular stone is used within the cells. This angular stone should be filled just above the top of the cell wall and compacted with a smooth rounded roller of max weight 1500kg/m² width without vibration for a minimum of 4 passes. The stone should lock together to form a solid base. We recommend a small test area before using if there is any doubt. Decorative gravel can be placed over the GRS material, we recommend no more than 10mm.

M27 type is also an option for GR material for certain applications (consult your Arboriculturist). This is a graded stone with bonded fines, and will achieve a compact base. Works are more than 25% after compaction and it is recommended for areas which require SU25 compliance.

greenfix, GFR Water Drain, Rock Road Park, Avenue under M6, Euxine, Birmingham B36 4 7SU

We warrant that the work shall be carried out in accordance with the specifications set out in the contract documents. We do not warrant that the work shall be carried out in accordance with the specifications set out in the contract documents. We do not warrant that the work shall be carried out in accordance with the specifications set out in the contract documents.

4.0 SCOPE

- 4.1 APM 7 describes the practical requirements for installing new hard surfacing and upgrading existing surfacing where with RPAs, based on the recommendations in BS 5837:2012 (7.4) and more recently APN 12 – ‘The use of cellular confinement systems near trees – A guide to good practice’ – Ben Rose – Arboricultural Association 2020.

5.0 TREE PROTECTION PLAN

- 5.1 The approved Tree Protection Plan (TPP) Indicates the location of the areas identified for the installation of ‘No-Dig’ 3D cellular confinement – usually as red shading covering exposed RPAs where it is not possible to install tree protection fencing.

6.0 GENERAL PRINCIPLES

- 6.1 Conventional surfacing installation based on excavating and compacting a supporting sub-base usually using a MOT Type 1 crush, is unacceptable within RPAs because it can damage roots and the rooting environment. This harm is caused by killing roots, compacting soil structure, and impeding water/gaseous exchange through the soil. Adverse impact on trees will be reduced by minimising the extent of these changes in RPAs. The specific design of the chosen approach is an engineering issue that will take account of the bearing capacity of the soil, the intended loading, and the frequency of loading. The detail of product and specification are technical matters to be provided by an appropriate specialist.
- 6.2 BS 5837:2012 & APN 12 recommends that three-dimensional cellular confinement systems are an appropriate sub-base solution for installing permeable hard surfacing within retained tree RPAs. The best products are Manufactured from high quality, high-strength polyethylene with a textured surface and perforated walls, such as GEOWEB® cells which have selected infill control shearing, lateral and vertical movement, and reduce subbase depth requirements. Some of the advantages to the use of this system include:
- Provides strength to confined soils
 - Distributes loads laterally, not vertically
 - Reduces point loads
 - Reduces compaction of the subsoil

6.3 With permeable infill (topsoil/vegetation, aggregate, sand), perforated GEOWEB® cell walls offer environmental benefits such as:

- Water infiltration
- Lateral movement of air and water
- Water and nutrient migration
- Promotion of adventitious root development

6.4 The expanded cells are then filled with washed clean angular 4-20mm stone with no fines and pinned into the desired location. This then forms a much-reduced depth of solid sub-base layer that acts as a 'floating raft', spreading the load across the whole construction width. The base layer can be topped with a variety of finishes including:

- Block Paving
- Porous and Standard Asphalt.
- Resin Bound Gravels
- Loose Gravels
- Gravel Retention System – Park Pave
- Vegetative Porous Pavement finish
- Concrete

6.5 Un-even and undulating surfaces and determining a tolerable level of excavation

6.5.1 The precise location and depth of tree roots within the soil is unpredictable and will often only be known if exploratory trial digs or TreeRadar surveys are undertaken. Ideally, all new surfacing within RPAs will be no-dig, i.e. requiring no excavation, but this can sometimes be difficult on uneven and / or severely undulating surfaces. New surfacing normally requires a relatively even graded sub-base layer. Where uneven, dips, pits and undulations can be made up to any high points with the same granular no-fines stone, permeable fill as that used to fill the cells. This sub-base will not be compacted as would happen in conventional surface installation.

6.5.2 Some limited excavation may be necessary to achieve this and need not be damaging if carried out carefully, supervised by the consultant arboriculturist and large roots over 25mm in

diameter are not cut. Tree roots and grass roots rarely occupy the same soil volume at the top of the soil profile, so the removal of an established turf layer up to 5-10cm from the surface is unlikely to be damaging to trees. However, this may not be possible where there is no grass because tree roots may grow right up to the soil surface, particularly with surface rooting trees, such as Beech or Birch and if the soil has a more naturally compacted soil type. In some situations, it may be possible to dig to a greater depth, or even excavate at all.

- 6.5.3 If tree roots are discovered less than 2.5cm in diameter, they can be cleanly cut with a sharp hand implement and the base for the surfacing formed with the preferred minimal excavation of up to 5-10cm. However, if roots over 25mm in diameter are exposed, cutting them may be too damaging and further excavation may not be possible. If that is the case, the surrounding levels will need to be adjusted to take account of these high points by filling with suitable material. If this is not practical, the situation will be discussed with the supervising arboriculturist before a final decision is made.

6.6 Edge retention for cellular confinement systems

- 6.6.1 Conventional kerb edge retention set in concrete-filled excavated trenches can cause damage to roots and will be avoided. Edge retention within RPAs will be designed to avoid any significant excavation into existing soil levels, with several approaches that are fit for this purpose.
- 6.6.2 For block pavements, the use of pre-formed edging secured by metal pins is effective and can be reinforced by concrete supports if there is no excavation into the soil. Alternatively squared edged concrete kerbing can be set within expanded cells using a dry mix concrete. This has the advantage of not requiring additional excavations close to the tree and eliminates contamination of the tree rootzone by the concrete due to the underlying thick woven geotextile (see example below).



6.6.3 Railway sleepers pinned in place or wooden boards offer alternative options, depending on the expected loading of the surfacing. If the edge retention needs to be battered down to lower surrounding ground levels, a permeable soil fill will be used, as agreed with the supervising arboriculturist.

6.7 Specific considerations for upgrading existing surfacing

6.7.1 When upgrading existing surfacing, the preferred option will be to leave it in place and install the new surfacing on top of it. If the retained surfacing is impermeable, it may improve conditions for tree roots if it is punctured before the new surfacing is laid, but this is detail to be agreed with the supervising arboriculturist.

6.7.2 If the existing surfacing is to be removed, it will need to be excavated down to the parent soil level just beneath the depth of the pre-existing sub-base material, following the guidance set out in APM 5 – Demolition of structures & surfacing within RPAs. The new surfacing will then be installed on this surface, as described above.

6.8 New surfacing near retained tree trunks

6.8.1 All new surfacing should be set back from existing tree trunks and buttress roots by at least 50cm to allow enough space for future growth potential and minimise the risk of distortion of the surfacing to be laid.

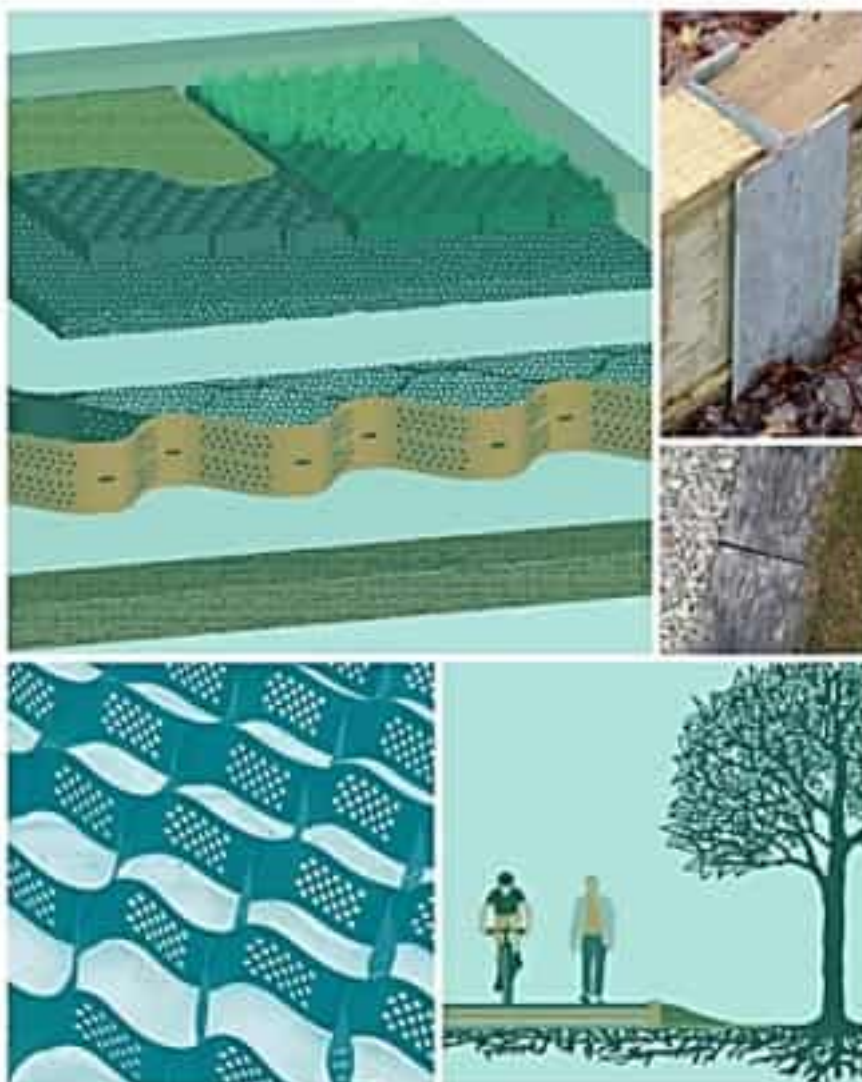
6.8.2 Although BS 5837:2012 recommends a minimum distance of 50cm between new surfacing and buttress roots, there may be scope for flexibility in this separation for mature trees with a reduced potential for significant future growth, if agreed by the supervising arboriculturist.

6.8.3 It is suggested that any such tree trunks or buttress roots adjacent to construction areas are protected from direct damage by machinery with tree trunk boxing or protective wrapping with a suitable breathable protective material ie. Hessian cloth.



THE USE OF CELLULAR CONFINEMENT SYSTEMS NEAR TREES: A GUIDE TO GOOD PRACTICE

GUIDANCE NOTE 12

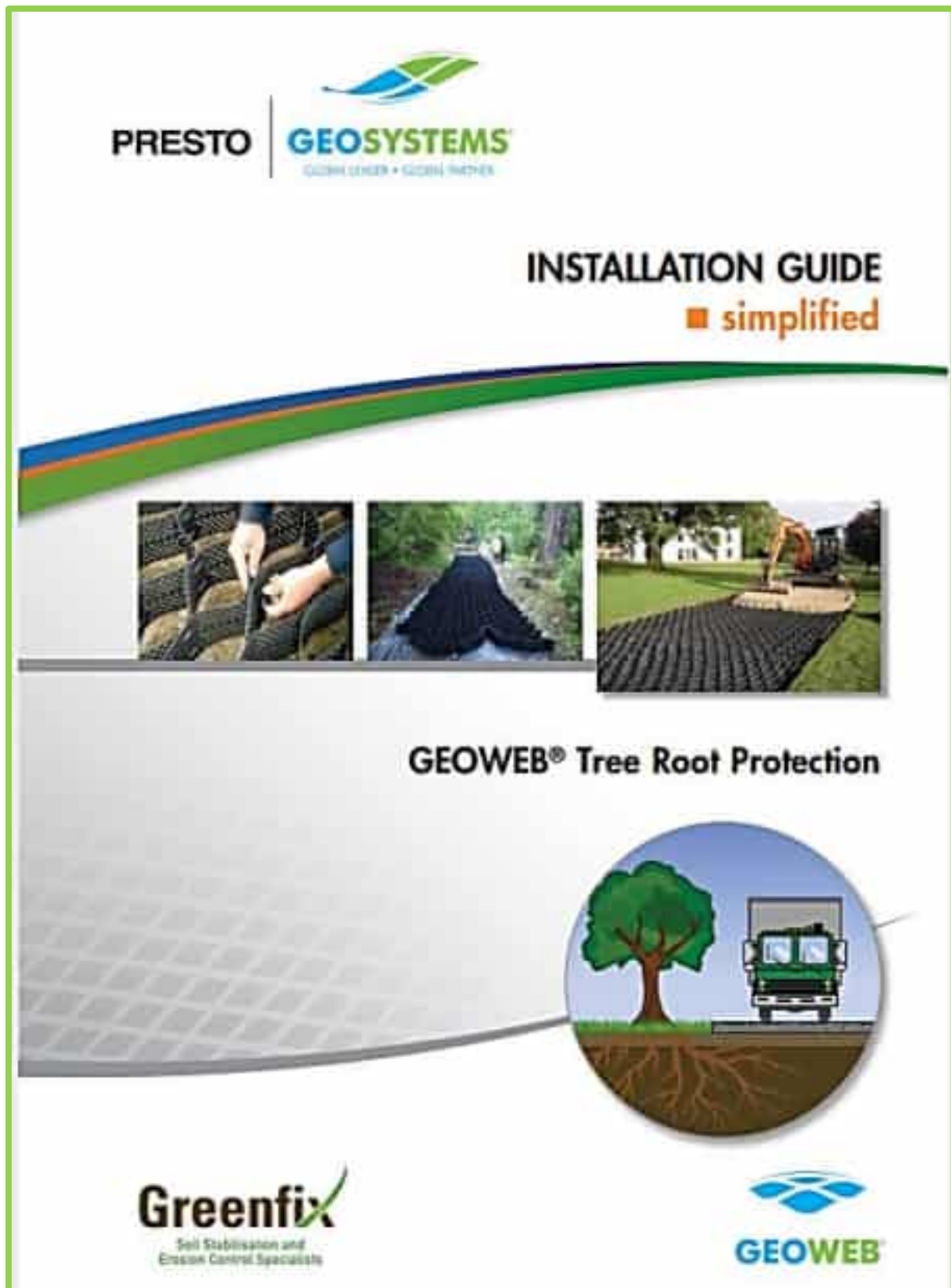


Author:
Ben Rose

The Arboricultural Association
The Home of Arboriculture

www.trees.org.uk

8.0 3D GROUND PROTECTION – GEOWEB TREE ROOT PROTECTION –
INSTALLATION METHOD



Method Statement - For the installation of GeoWeb Tree Root Protection System

8.1 INTRODUCTION

8.1.1 The Greenfix GEOWEB® system is available in 5 depths for varying traffic loadings but each site should have a specific design detailed to ensure the correct depth of product is used. However, unless the existing ground conditions are very soft and have a low CBR then the following can apply:

- Footpath System - Geogrid and geotextile combo with asphalt / resin - for Pedestrians and Cycleways, non vehicular traffic -
- 75mm - for Pedestrians, Cycleways and vehicles up to 1.5 tons
- 100mm - for Cars, 4 Wheel Drives, Vans etc up to 6 tons
- 150mm - for Fire Appliances, Removal Vehicles and Dust Carts up to 20 to 30 tons
- 200mm - for construction vehicles, cranes etc 40 tons and above
- 300mm – For extra heavy construction use – Cranes, Piling Riggs etc.

8.1.2 It is important to ensure the correct GEOWEB® cell size and cell depth are specified and installed based on the anticipated pavement loads. These are calculated based on the following criteria:

- Traffic type and loading
- Frequency of traffic
- Subgrade strength (typically CBR, Ev2, Cu or SPT values)
- Infill type
- Allowable settlement of the pavement

8.1.3 To assist you in determining the correct GEOWEB® solution for your application, Presto GEOSYSTEMS® or their network of distributors/representatives can assist with the calculation for your project. You can be confident that you will receive the most suitable and economical solution for your project.

8.1.4 Contact;

GREENFIX SOIL STABILISATION AND EROSION CONTROL SPECIALISTS

Old Manor Farm Yard Beckford Road Ashton-Under-Hill Evesham, Worcestershire, WR11 7SU

Tel.: 01608 666 027

E-Mail:

info@greenfix.co.uk

Roy@greenfix.co.uk

GeoWeb Tree Root Protection System

8.2 Materials List:

- Geoweb 3-Dimensional Cellular Confinement System
- TRP4000 geotextile. Overlaps by minimum 300mm. Separation / Pollution Control Geotextile
- TRP1000 Separation Geotextile (depending on surface finish)
- Staking pins and Atra Clips 600mm long
- Atra Keys – to mechanically join expanded panels of Geoweb
- 4/20mm or 40/20mm Clean angular stone to Bs EN 13242 and 12620.
- Finish Surfacing Materials.

8.3 STAGE 1 - Ground Preparation

- Remove surface vegetation or treat with suitable herbicide to level – under the supervision of the project Arboriculturist
- Fill any hollows in the exposed ground with no fines 4/20mm clean angular stone.
- Place TRP4000 geotextile Geotextile over the area to be protected ensuring laps ensuring a minimum overlap of 30cm.
- Allow adequate drainage as a separation layer between soft subgrade and GEOWEB® infill material
- Mark out the area to be protected with edging detail eg. Timber boards / treated railway sleepers or Greenfix Recycled Plastic Edgings

8.4 STAGE 2 – Installation of GeoWeb

- Roll out TRP4000 geotextile to cover the area to be protected
- Insert x 4 equally spaced steel pins along the width of the first panel
- Expand GEOWEB® sections over the area to be protected and use temporary stakes or weights to hold sections open to prevent movement during infilling
- Pin along the length of the panel and along each side to achieve this
- If full panels are not being used, then ensure the cells have been expanded to their full dimension.
- The GeoWeb panels can be cut to shape if required with a heavy-duty Stanley Knife
- Connect adjacent sections using ATRA® Keys. Position the sections so the slots are aligned, insert the key, and turn 90 degrees locking the panels together. ATRA® Keys provide a long-term connection that is safer, quicker, and stronger than staples or cable ties. In environmentally protected areas (SSSI in United Kingdom), ATRA® Keys can be used without the requirement for diesel-fuelled compressors

8.5 STAGE 3 - Filling the GeoWeb

- Using 4/ 20mm or 40/20mm clean angular stone to Bs EN 13242 and 12620 (depending on cell depth being used)
- For permeability, infill the fully connected GEOWEB® system with a well graded, angular stone such as a 4/20mm or 40/20mm clean angular stone.
- Allow 30mm overfill for any settlement of the stone into the cells during installation
- If the area is to be trafficked immediately slightly increase the amount of surcharge overfill to a max 50mm over the GeoWeb with 4/20mm or 40/20mm clean angular stone
- Consolidate the fill material with conventional plant or non-vibratory plant when required. Fill should be maintained above the GEOWEB® system by a minimum of 10mm at all times or a permanent wearing course of blocks, porous asphalt or gravel installed.

8.6 STAGE 4 – Finish Surfacing Details:

The GeoWeb TRP system can be surfaced with the materials listed below.

8.6.1 Finish 1 - Block Paving

- Place TRP1000 geotextile separation fabric over the filled GeoWeb.
- Lay sand / gravel bedding material as per manufacturer's recommendations.
- Place porous / standard blocks as per manufacturer's instructions. (Such as Brett Paving)

8.6.2 Finish 2 - Porous and Standard Asphalt.

- Slightly surcharge the GeoWeb with 30mm of 4/20mm or 40/20mm clean angular stone.
- Place hot Asphalt as per manufacturer's instructions.

8.6.3 Finish 3 - Resin Bound Gravels

- Place TRP1000 geotextile separation fabric over the filled GeoWeb.
- Lay Asphalt carpet and resin bound gravel to the required thickness and as per manufacturer's instructions.

8.6.4 Finish 4 - Loose Gravels

- Option 1 is to slightly overfill the GeoWeb with the clean angular stone by a maximum of 50mm.
- Option 2 is to place a 25mm thick decorative stone above the filled GeoWeb.

8.6.5 Finish 5 – Gravel Retention System

- Place a TRP1000 geotextile separation over the filled Geoweb.
- Place 20mm bedding layer of 5mm single sized stone or grit sand and lightly tamp.
- Lay Park Pave gravel retention system and fill with a 10 to 14mm decorative gravel.
- Greenfix Park Pave is a versatile interlocking plastic paver which is ideal for grass or gravel infill. As part of a sustainable drainage system Park Pave can be used for either attenuation or infiltration requirements. Park Pave is a low maintenance, cost effective option which is also made from 100% recycled plastic.

8.6.6 Finish 6 – Concrete

- Place TRP4000 geotextile separation layer over the filled GeoWeb.
- Cast the concrete slab over the geotextile. (Depth of slab to be designed by others)

Greenfix
Soil Stabilisation and
Ground Control Systems

info@greenfix.co.uk | tel: 01288 881493 | greenfix.co.uk

Greenfix TRP 4000 Non-woven Geotextile

TRP-4000 is a non-woven needle punched geotextile, manufactured from polypropylene fibres. TRP-4000 is used as a separation layer beneath the Geoweb® cellular confinement system in tree root protection applications.

Mechanical Properties	Test Method	Units	Values
Tensile Strength - MD	EN ISO 10319	MN/m	22
Tensile Strength - XD	EN ISO 10319	MN/m	22
Elongation at break - MD	EN ISO 10319	%	30.0
Elongation at break - XD	EN ISO 10319	%	35.0
CBB Puncture Resistance	EN ISO 12236	N	4
Dynamic Cone Drop	EN ISO 13443	mm	12.0

Hydraulic Properties	Test Method	Performance	Tolerance
Characteristic Opening Size	EN ISO 12958	90 µm	± 27.5µm
Waterflow Normal to the Plane	EN ISO 11058	300m/s	-18 (m/s)
Waterflow in the Plane @25 kPa	EN ISO 12958	1.0 x 10 ⁻⁴ m ² /s	9 x 10 ⁻⁷ m ² /s

Physical Properties	Test Method	Units	Values
Thickness under 2 kPa	EN ISO 9933-1	mm	2.4
Weight	EN ISO 9934	g/m ²	300
Roll Size		m	2.22m x 50m or 4.25m x 100m

*TRP4000 was tested under pressure of 120kPa to replicate pressure of pavement installation and traffic.

Geoweb, 202 Mowbray Farm, Southford Road, Southwold, Suffolk, IP19 1JL

PF008 120617



GEOWEB® Tree Root Protection

INSTALLATION GUIDE
simplified version

- 1 Prepare subgrade. Remove debris, rocks.



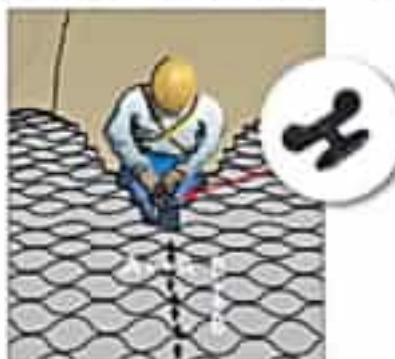
- 2 Install TRF4000 geotextile.
Overlaps by minimum 300 mm.



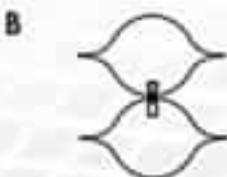
- 3 Partially expand GEOWEB® sections.



- 4 Connect GEOWEB® sections with ATRA® keys.



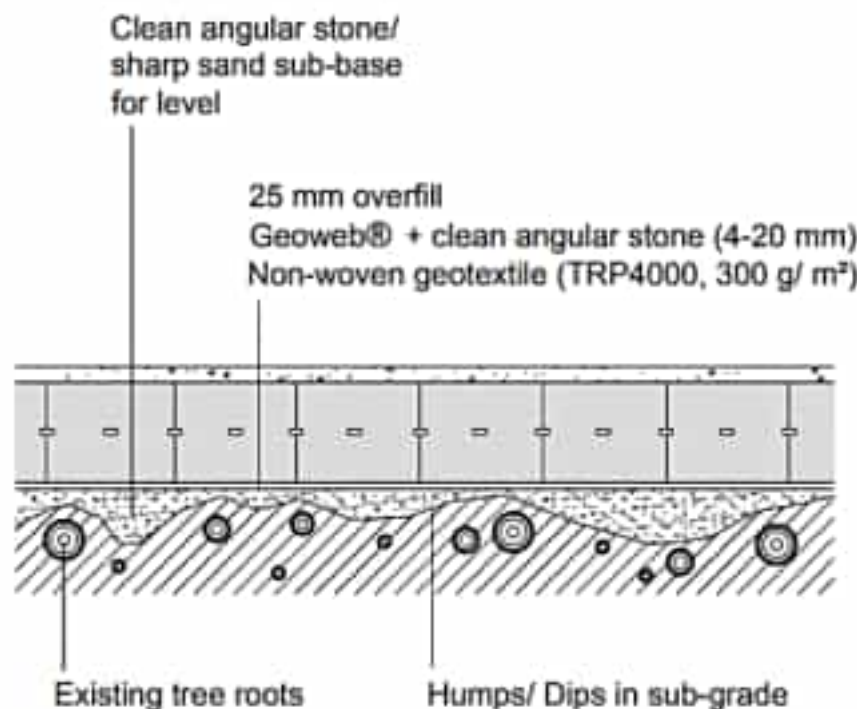
- 5 Connect side to side (A) and end to end (B).



- 6 Fully expand GEOWEB® sections.



NO-DIG TREE PROTECTION SYSTEM



Adjacent Geoweb® units to be joined with Atra-keys.

LIMITATIONS OF USE

The Evaluation is copyrighted and based on the use of Geoweb® manufactured by Presto Products. All rights reserved. Any use of the Evaluation for any geocell product other than that manufactured by Presto Products is strictly prohibited and makes this Evaluation invalid. Presto Products assumes no liability resulting from the unauthorized use of this Evaluation. The recommendations in this Evaluation are based on the specific characteristics, structural values and specifications of Geoweb® manufactured by Presto Products.

PRESTO PRODUCTS CO. 11111 1st Street Houston, TX 77034 (281) 415-1111 www.presto-products.com	SOILTEC DATA Evaluation No. Evaluation Date Evaluation By
Project: Tree root protection Preliminary design Description: Geoweb cell installation and erosion control Prepared by: [Signature] Checked by: [Signature] Date: [Date] Scale: 1:10 Sheet: 1 of 1	

9.0 3D CELLULAR CONFINEMENT TREE ROOT PROTECTION - EXAMPLES



Cellular confinement sub-base used with a permeable block paver finish for a cemetery car park and turning circle extension through a wooded copse.



Expanded 3D cellular confinement being filled with 4-20mm clean angular stone



3D cellular confinement webbing expanded, pinned and joined prior to filling with stone adjacent to retained trees.



3D Cellular confinement webbing being filled with no fines angular stone.

APPENDIX 3 - EAS APM 6 - Soft Landscaping within RPAs



Arboricultural Protection Method - APM 6 – Landscaping within Root Protection Areas



**ENVIROARB
SOLUTIONS**

APM 6 – Landscaping within Root Protection Areas

1.0 INTRODUCTION

- 1.1 Wilful damage to protected trees is a criminal offence and could lead to enforcement action, a fine, a prison sentence or both.
- 1.2 Work on site should be undertaken under the normal site risk assessment procedures and comply with the wider site health & safety rules.
- 1.3 All site operatives entering root protection areas (RPAs) should be fully briefed as part of the toolbox talk by the supervising arboriculturist before work starts.

2.0 OTHER RELEVANT APMs

- 2.1 APM 1 - Tree Protection – Fencing
- 2.2 APM 2 - Tree Protection – Temporary Ground Protection – To design temporary access to avoid soil compaction
- 2.3 APM 3 - Site Monitoring - Site Inspections & Supervision – To monitor all works within RPAs by the supervising arboriculturist
- 2.4 APM 8 - Excavations within RPAs - Minimise excavation into original undisturbed soil if existing surfacing is to be removed before installing new surfacing.

3.0 REMINDERS

- 3.1 No heavy mechanical cultivation such as ploughing or rotavating within retained tree RPAs.
- 3.2 Do not fill above the original ground levels within the RPAs of retained trees until the precise depth of fill has been agreed and authorised by the supervising arboriculturist.
- 3.3 Never raise soil levels above the original ground level / soil. Soil should never be heaped against trunks and no level changes should occur within 1m of the trunk unless authorised by the supervising arboriculturist.

4.0 SCOPE

- 4.1 APM 6 describes the practical requirements for soft and hard landscaping to avoid damage to retained trees, based on the recommendations in BS 5837:2012 (8) and BS 3998 (6.3). It assumes that the design and technical specifications prepared for the site contractors comply

with the relevant British Standards, and in particular, BS 8545 (2014) Trees: from nursery to independence in the landscape – Recommendations.

- 4.2 Soft landscaping includes the re-profiling of existing soil levels and covering the soil surface with new plants (grass or shrubs) and/or an organic mulch. Any new hard surfacing and structures will be installed as described in APM 7 – Installing Hard Surfacing - Tree Root Protection within RPAs, with many of the same principles applying.

5.0 TREE PROTECTION PLAN

- 5.1 The approved Tree Protection Plan (TPP) Indicates the location of the areas identified for the major new tree planting and soil re-instatement.

6.0 GENERAL PRINCIPLES

- 6.1.1 The existing vegetative surfacing may be required to be lifted and re-landscaped. This will require that it will need to be lifted by hand with most of the new soft landscaping works also undertaken by hand where within the RPA of retained trees.

6.1.2 SEQUENCE OF WORKS - The process should be:

- Remove the soft landscaping vegetation with handheld tools, working in small sections making the shallowest possible excavations.
- Remove arisings away from within the tree RPA area immediately.
- There may be shallow adventitious / feeding roots immediately below the surface of soft landscape surfacing, therefore great care should be taken.
- Cover the area with a temporary covering of damp hessian sacking immediately to prevent desiccation of surface roots. (As required if the ambient weather conditions are not damp / wet).
- If any roots under 25mm are accidentally scuffed by the soft landscaping works, the advice of the arboricultural consultant from EnviroArb-Solutions Ltd. It is likely such small roots can be cleanly cut with a sharp hand saw or secateurs [in accordance with 7.2.3 of BS5837:2012].
- It is likely that some spraying of perennial weeds will be needed either prior to vegetation removal or after. This should be undertaken carefully so that tree branches / leaves are not

sprayed. *Glyphosate* is the most likely choice of herbicide as it becomes inert on contact with the soil.

- New topsoil may be required to replace that which is likely to be removed during removal of existing surface vegetation and to make up appropriate ground levels. The current ground levels, particularly around retained tree trunks, should not be raised by more than 100mm as this can lead to root and cambium necrosis if for an extended period of time. The topsoil should be clean and screened and comply with BS3882:2007.
- Any exposed soil surfaces remaining after landscaping in shrub borders etc. Should be mulched to a minimum depth of 200mm using bark certified to BS EN 4790:1987 standard.

APPENDIX 4 - PLANNING REPORT CAVEATS

General - Trees

Unless otherwise stated tree observations have been undertaken from ground level and using non-invasive techniques only with tree locations plotted according to the client provided site topographical survey information (where a topographical survey cannot be provided the accuracy of tree locations based upon an OS plan base cannot be relied upon). Comments contained within the report on the condition and risk associated with any tree relate to the condition of the tree at the date and time of survey. Please note that the condition of trees is subject to change. This change may occur but is not limited to biological and non-biological factors as well as mechanical / physical changes to conditions in the proximity of the tree. Trees should be inspected at intervals relative to identified site risks and in accordance with relevant HSE and Central Government guidance. EnviroArb Solutions Ltd can provide further information on this matter if required.

Unless otherwise specified, no checks have been carried out in respect of statutory controls that may apply, e.g. Tree Preservation Orders, Conservation Areas or planning conditions¹.

Where tree surgery works have been identified these works are based on the assumption that full and detailed planning is approved, no tree works should be undertaken prior to determination of this application without up-to-date confirmation of the Tree Preservation Order / Conservation Area Status of the vegetation. All tree works should be undertaken in accordance with the appropriate Duty of Care. This should include, for example, site specific risk assessments and due diligence inspections for the presence of wildlife and protected species and habitats..

Where Tree Felling is required prior to planning approval - Any woodland operations made where the volume of timber felled is over 5m³ within any calendar quarter and is not subject to stated exceptions, will require a Felling License as described within the Forestry Act 1967 as amended and / or as part of the Environment Act 2021 Part 6 s.114 & 115². Possible exceptions apply to felling trees that, when measured at a height of 1.3 metres from the ground have a diameter over bark of 8cm or less or if thinning (i.e. felling carried out in order to improve the growth of the remaining trees), have a diameter over bark of 10cm or less; or if underwood or existing coppice (i.e. previously managed by cutting to promote multi-stemmed growth arising at or near ground level), individual stems have a diameter over bark of 15cm or less³.

Any comment relating to 3rd party trees has been made without full access to the tree(s). Should these trees have any impact on the proposed development we would advise you to instruct us to contact the 3rd party and undertake further inspection work.

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Not a Design Statement or Method Statement

This report has been prepared in respect of development impacts on trees. The report provides details and makes in principle recommendations relating to tree protection, which may have implications for design, construction, materials and methods to be employed in the development. Any such recommendations should be approved by the relevant designer / competent person.

¹ The Town and Country Planning (Tree Preservation) (England) Regulations 2012 & Town and Country Planning Act 1990 – Part V111_ch1 – Trees SS-210

² Refer to the Forestry Act 1967-6 & Environment Act 2021-6s.114 & 115 & The Forestry (Exceptions from Restriction of Felling) Regulations 1979-7 for the complete list of exceptions contained in those pieces of legislation.

³ Forestry Act 1967 Part 2-9 - Requirement of licence for felling



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