



Applicant Response to GLA (Green Infrastructure)

Planning Application Reference 2382/APP/2023/2906

Broadwater Lake, Moorhall Road, Harefield, UB9 6PE

Post Stage 1 Comment (12/02/2025)	Applicant Response
<p>London Plan Guidance on Fire Safety restricts the use of combustible materials in the external walls of a building, limiting the use of green walls.</p> <p>The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF score by improving the quality or quantity of greening across the wider masterplan.</p>	<p>There are no green walls proposed on any buildings in the development. The acoustic barrier in the camping zone will include some native climbers, but this is independent of any building.</p> <p>The Masterplan is landscape led with a 0.98 UGF score which is a significantly positive score, compared to the 0.3 requirement.</p>
<p>The site is within the Mid-Colne Valley Site of Importance for Nature Conservation (SINC), identified as being of Metropolitan Importance. The site also adjoins the London's Canals SINC, identified as being of Metropolitan Importance. In accordance with Policy G6 of the London Plan the applicant should avoid</p>	<p>A comprehensive Environmental Impact Assessment (EIA) has been undertaken. The Biodiversity Chapter (Chapter 7) assesses the likely significant effects of the Proposed Development during both construction and operation on designated ecological sites, including the Mid-Colne Valley Site of Importance for Nature Conservation (SINC) and London's Canals SINC.</p>



Note continued

impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. If avoidance of impacts is not possible the applicant should set out how they have followed the mitigation hierarchy to minimise development impacts.

The applicant should provide an assessment of the potential impacts to the SINC, specifically construction impacts and indirect impacts (with reference to Paragraph 8.6.5 of the London Plan). This should be provided prior to Stage 2 to demonstrate compliance with Policy G6.

An assessment has been undertaken for the Mid Colne Valley Site of Special Scientific Interest (SSSI), which overlaps with and encompasses the relevant habitats within the SINC at Broadwater Lake. The habitats and species present within this part of the SINC are consistent with those underpinning the SSSI designation. On this basis, and to avoid duplication, the SSSI assessment has been used as a representative assessment for the SINC. This is considered a proportionate and robust approach, and the conclusions of the SSSI assessment are directly applicable to the SINC (refer to Paragraph 7.8.31 of Chapter 7).

In accordance with Policy G6 and Paragraph 8.6.5 of the London Plan (2021), the assessment considers both direct and indirect effects on designated sites, including disturbance arising from noise, shading and artificial lighting. These effects are assessed alongside construction effects in Table 7.21 of the ES.

The assessment concludes that, following the implementation of embedded mitigation, the residual effects on the Mid Colne Valley SSSI and associated SINC during construction are minor adverse. During operation, effects are assessed as minor adverse to minor beneficial. In all cases, effects are not significant in EIA terms.

The mitigation hierarchy has been applied throughout, with measures embedded to avoid impacts where possible and minimise effects where avoidance is not feasible. Additional enhancement measures are also



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	<p>incorporated, with all measures secured through the Outline MEMP (see Section 7.7)</p>
<p>The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 10.01% of habitat units and 1.53 hedgerow units (570.75%). However, it appears that no change is proposed for watercourse units. The applicant should provide evidence that the proposed development secures a net biodiversity gain of at least 10% for watercourse units. If biodiversity net gain is not achievable on the site for watercourse units, the applicant should review opportunities for biodiversity offsetting in consultation with the borough.</p> <p>The applicant has confirmed that trading rules have been satisfied.</p>	<p>A comprehensive biodiversity enhancement strategy and landscape strategy has been prepared to protect, enhance and support both new and existing habitats on Broadwater Lake. Natural England’s biodiversity net gain (BNG) metric is not designed for development on waterbodies and SSSI’s which are technically excluded from providing the minimum requirement of 10.01% BNG.</p> <p>The scheme delivers additional significant improvements that are set out in detail within the submitted MEMP. These improvements cannot be assessed within the BNG calculator and additional weight should therefore be placed on these benefits. Furthermore, the planning application was submitted before the 12th February 2024 and is therefore exempt from the statutory 10% net gain requirements. There is no requirement to provide additional information for watercourse units.</p>
<p>There are a number of existing trees on site. The arboricultural report states that 8 Category B and 8 Category C trees are to be removed. Wherever possible, trees of value should be retained.</p> <p>The application should provide an assessment of the value of the trees to be lost using the appropriate</p>	<p>With regard to the use of ‘i-tree’ or ‘CAVAT’, these systems are designed for use with individual trees rather than components of a woodland. There is only one accepted valuation system for woodland, the Helliwell system. The Arboricultural Association state the following about the Helliwell system:</p>



Note continued

valuation system and set out how this has been accounted for through replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be determined. The applicant should clarify the number of trees proposed.

"It has been extensively used in court cases, insurance claims and public inquiries to place visual amenity values on individual trees and to a somewhat lesser extent has been used in court to place visual amenity values on woodland."

This system uses 6 criteria to produce scores which are then multiplied together to form a total score (using the Helliwell formula). The table below shows the scores for each criterion in this instance:

Size of Woodland	1
Position in Landscape	2
Viewing Population	2
Presence of other trees and woodland	0.5
Composition and structure of woodland	2
Compatibility in the landscape	3
Total	12

The Arboricultural Association lists the unit vale for woodlands as £215.94. Hence the part of the woodland to be removed is valued at £2591.28.

Given that the replacement planting would be subject to the same scoring other than size, this is the only variable to consider. The table below scores the replacement planting, with a total value of £5182.56.



Note continued

	Size of Woodland	2
	Position in Landscape	2
	Viewing Population	2
	Presence of other trees and woodland	0.5
	Composition and structure of woodland	2
	Compatibility in the landscape	3
	Total	24

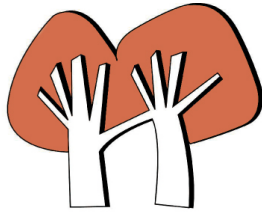
Whilst the figures are substantially less than CAVAT, in particular, that is not the relevant point in this instance: the relative values are the important factor and these would be the same regardless of the valuation system due to the sheer number of replacement plantings. To conclude, the removals are more than adequately mitigated in the replacement planting.

A letter confirming the above has been prepared by Landmark Trees and is enclosed as Document 1.



Document 1

Response Letter from Landmark Trees (dated 2nd April 2026)



Landmark Trees

Our ref: QUOD/BWL/Ltr/01

Charlotte Williams
Quod
21 Soho Square
London
W1D 3QP

2nd April 2026

Dear Charlotte,

Re: Tree valuation at Broadwater Lake

I write following the issue of the below comment from the Greater London Authority as part of their consideration of a planning application at Broadwater Lake, UB9 5HJ.

There are a number of existing trees on site. The arboricultural report states that 8 Category B and 8 Category C trees are to be removed. Wherever possible, trees of value should be retained.

The application should provide an assessment of the value of the trees to be lost using the appropriate valuation system and set out how this has been accounted for through replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be determined. The applicant should clarify the number of trees proposed.

With regard to the use of 'i-tree' or 'CAVAT', these systems are designed for use with individual trees rather than components of a woodland. To my knowledge, there is only one accepted valuation system for woodland, the Helliwell system. The Arboricultural Association state the following about the Helliwell system:

"It has been extensively used in court cases, insurance claims and public inquiries to place visual amenity values on individual trees and to a somewhat lesser extent has been used in court to place visual amenity values on woodland."

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This system uses 6 criteria to produce scores which are then multiplied together to form a total score. The table below shows the scores for each criterion in this instance:

Size of woodland	1
Position in landscape	2
Viewing population	2
Presence of other trees and woodland	0.5
Composition and structure of woodland	2
Compatibility in the landscape	3
Total	12

The Arboricultural Association lists the unit vale for woodlands as £215.94. Hence the part of the woodland to be removed is valued at £2591.28.

Given that the replacement planting would be subject to the same scoring other than size, this is the only variable to consider. The table below scores the replacement planting, with a total value of £5182.56.

Size of woodland	2
Position in landscape	2
Viewing population	2
Presence of other trees and woodland	0.5
Composition and structure of woodland	2
Compatibility in the landscape	3
Total	24

I would add to the above, that whilst the above figures are substantially less than CAVAT, in particular, provides, that is not the relevant point in this instance: the relative values are the important factor and these would be the same regardless of the valuation system due to the sheer number of replacement plantings. To conclude, the removals are more than adequately mitigated in the replacement planting,

I trust the above provides sufficient information at this time but please do not hesitate to contact us should you require further information.

Yours sincerely

Adam Hollis
MSc Arb MRICS FArborA MICFor C ENV
Registered Consultant
Chartered Surveyor, Forester & Environmentalist