

## **Benjamin Bailey**

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**From:** James Veats  
**Sent:** 18 December 2019 12:55  
**To:** Benjamin Bailey  
**Cc:** Dave Frye  
**Subject:** PLAN/2019/1177 Egley road (David Lloyd)

**Switch-MessageId:** 9bcb2554f3aa49e68ff924a525a46cea

Dear Ben,

Please see the below detail relating to the proposed designs for Land at Egley Road (PLAN/2019/1177)

The proposed implications are not considered to be acceptable at this stage for the following reasons

### Arboricultural Report (Ref:7758.1)

#### **Tree Removal**

- W1 (The woodland) is currently protected by a 1973 area TPO and has been classified in the Arboricultural Report as an A2 woodland. A2 represents the highest grade afforded to trees during a BS5837 survey. These are "Trees of High Quality with an estimated remaining life expectancy of at least 40 years" and are "Tree groups or woodlands of particular visual importance as arboricultural and/or landscape features". Therefore the removal of 25% of this woodland would be of significant detriment to the both the character of the area and to the long term retention of the woodland.
- It has been noted in section 3.26 of the report that the removal of 25% of the woodland will expose the northern edge to potential future windthrow. There is no doubt that this will have a significant impact on the structure of the woodland as the outer trees which are currently shown to be removed provide a buffer to the trees located internally which have not had the need to develop a root structure to cope with the type of wind loading they will now be exposed to.
- Section 3.26 also states that the visual effects from the removal of the woodland will be essentially mitigated once the development has been concluded. "The removal of W1 will be partially screened from the view of the public". Since this has been stated it should be considered that a TPO is placed upon trees due to the visual amenity of those trees, therefore to remove and reduce the public amenity value afforded by these trees would be considered unacceptable as the long term impacts will result in significant further losses.
- T1 is a mature open grown Oak tree forming part of a group of three mature Oak trees (T1, T2 and T3). This group in themselves are of high public amenity value and should be regarded as an A2 group. The removal of T1 is considered to be unacceptable as this will be of detriment to the sylvan character of the area and will likely be of detriment to the group as a whole.
- T21 is a mature specimen fastigate Beech. Its removal has been identified in section 3.17 on the grounds of health and safety. However this will only be as a result of the severance of its rooting environment due to the proximity of the proposed development. The removal of this tree can be avoided through adjustments to the proposed plans.
- As identified within the report there are groups of trees (G1, G2, G3, G4) which play an important part in the structure of the woodland (W1). The removal of these groups would therefore be unacceptable.
- The removal of 25% of the woodland will certainly have a detrimental impact upon the wildlife and ecology of the site and its removal is not acceptable.
- The arboricultural report identifies that a further 5m of felling into the woodland edge would be required in order to apply the mitigation proposed. This removal is not indicated on the tree removal plan and should be shown so that a clear picture can be presented. It is possible that the 5m felling may also include T20 as it is situated close to the woodland edge. T20 is a B grade Oak which should be retained and protected as a mature specimen.

#### **Root protection areas (RPAS)**

- Table 4 outlines the area of incursion within the RPAs of retained trees. It should be noted that incursions of over 20% are unacceptable regardless of any specialist construction techniques used as stated in section 7.4.2.3 of BS 5837 (“New permanent hard surfacing should not exceed 20% of any existing unsurfaced ground within the RPA”). By placing hard surfacing over the rooting environment of a tree there will be a restriction on the amount of water and nutrients being made available which will therefore in the long term reduce the viability of the tree. This would apply to T2, T3, T10 and the woodland (W1)
- Given that T9, T10 and T11 are situated within undisturbed soil which is highly sensitive to compaction, any incursion below 20% will require specialist construction techniques.
- Any incursion into the RPA of T2, T3 and the Woodland edge would not be considered unacceptable for the following reasons: The trees exist within an open grown field which is not compacted and any compaction or hard surfacing within the area would be of detriment to the trees. Given that the proposed plans have sited car parking spaces below the canopies of T2 and T3, it is likely that there will be future pressures to prune and maintain the trees which would reduce their amenity value considerably. It has also been proposed that a road be installed in between T2 and T3 and along the woodland edge which is likely to be salted during the winter. Salt will contaminate the rooting environment of the trees and therefore reduce the likelihood of survivability in the long term. Section 4.6 of the report has identified that “building and road footprints are carefully planned to generally avoid the need for excessive tree surgery”. Given the proximity of the proposed roads it is likely that continual pruning will be necessary to prevent damage to vehicles.
- The incursion within the RPA of the woodland and the “selective reductions” as outlined in section 4.12 of the Arboricultural report is not considered to be acceptable. When trees are pruned they often react by putting on prolific re-growth and therefore a denser canopy structure. This dense structure creates a larger sail area and increases the amount of wind-loading on the trees structure. There will not be enough time for the tree to have adapted to its new exposure therefore cyclical pruning will be required. This is not only a pressure placed upon the tree but it is also a financial burden placed upon the landowner.
- The RPA of T2 has not been offset to account for the presence of roots from T1 and T3. It is likely that the RPA of T2 is more oval shaped as opposed to a circle. Tree roots are unlikely to occupy the same space (similar to canopies) therefore the incursion into the RPA of T2 is likely to be high and therefore the proposed will be of greater detriment to the long term viability of the tree.
- The RPAs for T9, T10 and T11 have not been offset to account for the railway line to the rear. Therefore these should be offset to the East which would place a greater pressure on the trees rooting from the proposed plans.

#### Landscaping

- The landscaping plans do not represent the intentions of the mitigation suggested in the arboricultural report. There appears to be no extra planting on the woodland edge which would be necessary to mitigate for the removal of the woodland.
- We would require tree pit designs for the proposed tree planting which should include the use of underground structured cells in areas where there is limited rooting for trees. This will include the planting of trees to the front of the residential properties and within the car parks to the David Lloyd gym. Underground cells secure the long term retention of trees within areas of hard surfacing and therefore increase the canopy cover of the site and is in line with the Councils Tree Strategy
- The landscaping details will need to show species selection and sizes.
- The planting of two trees within the retained grassed area of T3 would not be appropriate. The tree is already having a significant area of its RPA covered in hard surfacing and the inclusion of two trees within this site will only add to future pressures from competition in a restricted site.
- Planting should be implemented along the boundary between the proposed site and the existing school to act as a buffer between the two sites.
- It should be noted that the Swimming Pool and Spa area sits to the north of the retained woodland. This will be significantly shaded throughout the year by the existing woodland and as this is a deciduous woodland there will be a significant amount of leaf fall around the area. This may result in extra pressure to prune and fell trees adjacent to the site.
- The residential properties located adjacent to the woodland will also face shading throughout the year which may result in extra pressure to prune and fell trees adjacent to the site.

#### Drainage and services

- The drainage information shows water/drainage retention tanks within the RPA's of T2 and T3 this is unacceptable and will have to be moved to outside the RPA's of these trees.
- There should be no service and drainage runs within the RPA,s of any retained trees.

### Conclusion

The removal of protected trees in order to facilitate the proposed is not considered to be acceptable. The trees on site are currently covered by an area TPO dated 1973 which affords them statutory protection. The woodland is of high public amenity value and its partial loss would be of detriment to the character of the area and to the remaining trees which will be exposed to new forces.

The landscaping details do not fully align with the details of the arboricultural report in respect of mitigation of the woodland and do not make provision for tree pit details, species of trees and size of trees to be planted. We would require underground structures in areas where rooting is limited.

The current incursions within the RPAs of retained trees is not considered acceptable due to the nature of the virgin ground that the trees reside in. It is likely that these incursions will damage the trees therefore reducing their long term viability and ultimately leading to their loss.

Kind Regards

James Veats and David Frye  
Arboricultural Officers WBC

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Woking Borough Council, Civic Office, Gloucester Square, Woking, Surrey GU21 6YL

**Phone:** 01483 743739 | **Web:** [www.woking.gov.uk](http://www.woking.gov.uk)

For general enquiries, please call Woking Borough Council's Contact Centre on 01483 755855