

PETERSFIELD SOCIETY OBJECTION TO:

SDNP/18/03856/TCA | A1 and A2 - Fir Trees - Fell A3, A4 and A5 - Fir Trees - Reduce crown to roof level | 14 Heath Road Petersfield GU31 4DU. *Applicant: Mrs Susie Shanks. Agent: None. Case Officer: Maria Stewart. Ward: Rother. PTC Cllrs: Deane/Humphries. EHDC Cllr: Ayer.*

1. We **object in the strongest possible terms** to this Notice to fell the two magnificent Western Red Cedar trees at the front of the 1st Petersfield Scouts building in Heath Road and to reduce three others, all within the Conservation Area, and argue that there are strong and compelling reasons for all five trees to be placed under the protection of Tree Preservation Orders.
2. We have taken the advice of our Chartered Forester trustee and of the Tree Council's Petersfield Tree Warden in the preparation of these comments.
3. The application is staggering. How could anyone consider felling two magnificent Western Red Cedars and vandalising three more? It beggars belief. Surely it must be resisted using all available measures by the Local Planning Authority.
4. The Western Red Cedars are not, according to our information, protected by Tree Preservation Orders (TPOs). We question why the authority has not placed TPOs on the trees and have applied today for it to do so as a matter of urgency, given the clear and present danger threatened by the Notice.
5. The Notice identifies the trees as 'Firs'. This is entirely incorrect and demonstrates a complete absence of understanding, knowledge and care of the importance of trees and their value to the community. The trees under threat are wonderful specimens of *Thuja plicata* from the Cupressaceae family commonly known as Western Red Cedar.
6. We understand from a presentation given to the Town Council Planning Committee on 26 June this year by an EHDC Arboricultural Officer that the Local Planning Authority has seriously limited powers to resist the felling of trees in the Conservation Area. The Officer explained that site visits are made for all applications and that Officers consider the public amenity provided by a tree and the tree's health but there is no power to refuse an application other than by placing a Tree Preservation Order on the tree. The TPO must be defensible but only in terms of the public amenity value of the tree.
7. National Planning Policy Framework 2018 Planning Practice Guidance: 'Tree Preservation Orders and trees in conservation areas' states that 'Amenity is not defined in law, so authorities need to exercise judgment when deciding whether it is within their powers to make an Order' and continues 'Orders should be used to protect selected trees and woodlands if their removal would have a significant negative impact on the local environment and its enjoyment by the public.' When considering whether trees should be protected by a TPO the Guidance advises authorities 'to develop ways of assessing the amenity value of trees in a structured and consistent way, taking into account the following criteria:
 - a. Visibility: The extent to which the trees or woodlands can be seen by the public will inform the authority's assessment of whether the impact on the local environment is significant. The trees, or at least part of them, should normally be visible from a public place, such as a road or footpath, or accessible by the public.
 - b. Individual, collective and wider impact: Public visibility alone will not be sufficient to warrant an Order. The authority is advised to also assess the particular importance of an individual tree, of groups of trees or of woodlands by reference to its or their characteristics including their size and form; their future potential as an amenity; their rarity, cultural or historic value; their contribution to, and relationship with, the landscape; and their contribution to the character or appearance of a conservation area.'

8. EHDC is a member of the National Association of Tree Officers which promotes the use of the industry standard CAVAT (Capital Asset Value for Amenity Trees) methodology for valuing the amenity of trees as public assets. Co-authored by Dr Kieron Doick, Head of Urban Forest Research Group, a paper of the same title published in the Arboricultural Journal on 09 April 2018 states that 'CAVAT has been in use for over a decade now and the authors' knowledge of its use suggests that it is being used on a consistent basis by a large number of UK local authorities for urban amenity tree valuation.'

9. 'Petersfield's Trees - their importance and value' 2017 is the report of the Petersfield i-Tree Survey carried out in 2016 at the request and with the agreement, support and sponsorship of the Town and District Councils, the South Downs National Park Authority and Forestry Commission's Forest Research Group. Volunteer tree surveyors were trained at the Scout Hut at 14 Heath Road and used the Western Red Cedars this Notice proposes to destroy to develop their surveying skills.

10. At the training session, one of the 1st Petersfield Scouts trustees confirmed their determination to secure the future of the trees and explained that the front garden wall had recently been sensitively repaired to this end. Felling the trees would set an appalling example to the Scouts of how to preserve the best interests of the community they serve. What value is there in gaining an Environmental Conservation Activity Badge if your Leaders now seek to destroy the environment outside the Scout Hut itself?

11. The impact on and contribution to the Conservation Area by the five Western Red Cedars is immense. The trees are an important and valuable component of views down the High Street from The Square, from Tor Way and College Street, from The Avenue, from Dragon Street and, more closely from Heath Road west and east all as the attached photographs testify. They form a critically important setting for the Scout Hut itself, the Festival Hall and other local listed buildings. The combination of built and natural environments and the dark red brickwork and dark green of the trees is unique and powerful. All in all the prominence and contribution of the trees is such that they are clearly worth the protection of TPOs.

12. We have considered the damage to garden wall and pavement asserted by the application. The pavement shows no signs of damage and, apart from some movement which could be easily and inexpensively repaired, neither does the wall. Photographic evidence is attached. If the applicant is really worried about potential damage to the garden wall we strongly suggest that a qualified arboricultural consultant and structural engineer be consulted - there are tried and tested ways of maintaining wall stability whilst protecting nearby trees, without the drastic intervention of felling them.

13. At over a hundred years old, the trees themselves are important heritage assets of the town. Together with other large trees they are an essential component of the townscape and its historic character. SDNPA's Conservation Area Character Analysis and Management Plan (CAAMP17) states on p19 that 'The most visually important trees and tree groups within the Conservation Area have been marked on the individual Character Area maps, but the omission of a particular tree does not mean that it is of no significance'. On p44 it highlights 14 Heath Road as the former Men's Institute building now used by the Boy Scouts. The photograph shows the T1 Western Red Cedar. On p72 CAAMP17 identifies the trees as 'important'.

14. We judge that all trees under threat by the Notice are in good health and can look forward to many decades of further life if managed sensitively. The applicant makes no claim that the trees are suffering from ill-health or that they pose a danger to the public.

15. The application asserts that the trees have caused or are likely to cause structural damage to the building, the front garden wall and the pavement outside the property. One of our architects has carried out a visual and photographic examination of the front and side elevations of the building, of the garden wall and of the pavement. No damage caused by the trees to the structures could be found apart from at the west and east ends of the garden wall. The pavement shows no signs of damage. The only damage to the building fabric is clearly caused by rainwater consequent upon poor gutter maintenance and movement of the rear extension resulting in a loosening of the bricks at the toothed junction with the original building. Photographs are attached in support of our assessment. The garden wall has clearly been repaired and could be repaired again. Its west end leans outwards from the end of the repair work by a small amount but not dangerously. This end could be reconstructed, with Conservation Officer approval, either around the inside of the tree or by the replacement of the stone and brickwork with iron railings. Other solutions could be discussed with the applicant. The eastern end of the wall has a very small crack which could be easily repaired. The wall does not lean out at this point and appears not to be unstable.

16. Any assertion of damage, present or future, would need to be substantiated by a report by a Consultant Civil and Structural Engineer experienced in tree damage. The planning authority would no doubt require this, given the importance of the trees. EHDC's own 'Buying a tree with a house in the garden' brochure makes it clear that cracking of a driveway is insufficient reason for tree felling. In this case no damage to the pavement is evident.

17. Loss of the trees would clearly result in a reduction of the area's biodiversity. We understand that the Arboricultural Officer is not permitted to take this into account even though we might argue that biodiversity should be included in the definition of amenity. Suffice to say Petersfield Neighbourhood Plan (PNP15) Policy NEP7 states that proposals which result in a loss of biodiversity will not normally be permitted.

18. Since Western Red Cedars grow in a conical pattern, any reduction of crown height as requested for A3, A4 and A5, will deform the tree shape and a secondary leader will develop off-centre. It is better to side prune and avoid restricting the natural desire for this specie to grow in a conical mode. Any work approved for these trees should only be undertaken by a contractor who is a member of a trade association or professional organisation such as the Arboricultural Association or International Society of Arboriculture. The contractor should work to British Standard BS3998:2010 Tree Works – Recommendations. However, we reiterate that we seriously challenge the need for such intervention.

19. The Petersfield Tree Survey used CAVAT to assess amenity value. CAVAT has now been employed to assess the value of the two Western Red Cedars under threat of demolition. The amenity value in monetary terms of each tree is assessed at over £100,000 demonstrating the importance of these trees to the town and its community. And this amenity value does not take into account the benefits accruing from the trees in terms of cooling, shading, noise attenuation, flood water attenuation and biodiversity habitat.

20. £100,000 per tree is enormous. It's a lot of money. It's a lot of value. The other three trees not assessed in this way are also likely to have similar CAVAT values. This values the group of five trees at a total of around half a million pounds. We object to the massacre of such valuable heritage assets in such a prime public location. The trees deserve to be protected by Tree Preservation Orders.

21. This application is as horrifying as the proposal to fell the two Silver Maples in The Square. Fortunately a way of saving these trees was found. We are therefore copying this objection to as many decision-makers as possible to attempt to prevent the devastation which would be wrought if the Local Planning Authority was to raise no objection to the Notice and was to consider the trees insufficiently important to be protected by TPOs.

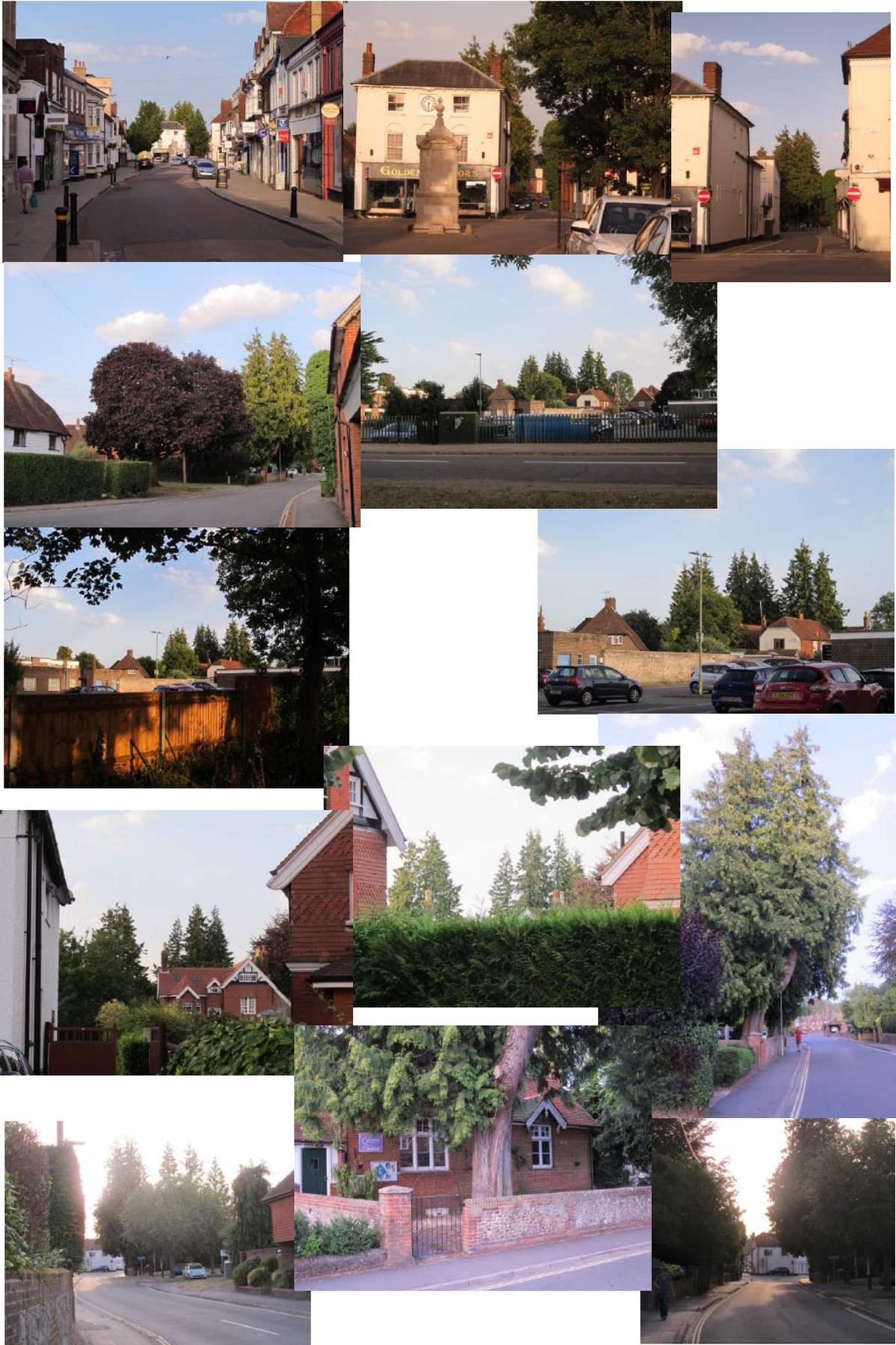
22. We very much hope the Notice will be withdrawn. If it is not, the Local Planning Authority should object by placing Tree Preservation Orders on all these wonderful Western Red Cedar trees.

Petersfield Society.

Please note that one of our trustees has an interest in this application and in accordance with our procedures has therefore taken no part in the preparation of our submission.

Please see photographs on the following two pages:

14 Heath Road : Views of Western Red Cedar trees from around the Town



14 Heath Road: Front and Side Brickwork : Front Garden Wall and Pavement

