



ARBORICULTURAL OBJECTION
IN RESPECT OF
PLANNING APPLICATION 23/4152M

AT
POYNTON POOL RESERVOIR, POYNTON PARK
LONDON ROAD NORTH, POYNTON

ON BEHALF OF
POYNTON TOWN COUNCIL

Author: Glyn Thomas
Our Ref: CW/11044-OBJ
LPA Ref: 23/4152M
Date: 20 December 2023

Copyright © 2023 Cheshire Woodlands Limited. All rights reserved

CONTENTS

- 1.** Instruction
- 2.** Introduction
- 3.** Observations
- 4.** Conclusions and Grounds for Objection

1. INSTRUCTION

- 1.1.** Cheshire Woodlands is instructed by Poynton Town Council to review arboricultural supporting information submitted with planning application 23/4152M and produce a written objection.

2. INTRODUCTION

- 2.1.** I am Glyn Thomas, senior consultant with Cheshire Woodlands Limited and my area of expertise is arboriculture.
- 2.2.** This objection is informed by a review of the arboricultural information submitted in support of a planning application that seeks consent for works to the Poynton Pool dam embankment to increase the flood resilience of the reservoir.
- 2.3.** I have reviewed the following planning submission documents:
- Arboricultural Impact Assessment and Arboricultural Method Statement BRJ10627-JAC-XX-XX-RP-EN-0009 (June 2023);
 - Red Amber Green (RAG) Tree Removal Report BRJ10627-JAC-XX-XX-RP-EN-0004 Revision P01 (17 January 2023); and
 - BS5837:2012 Tree Survey Report BRJ10627-JAC-XX-XX-RP-EN-0001 Revision P01 (7 October 2022).
- 2.4.** Grounds for objection to the planning application are informed by:
- British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations (BS5837);
 - Cheshire East Local Plan Policy SE5 Trees, Hedgerows and Woodland; and
 - Cheshire Woodland's Report CW/11044-R (4 January 2023)
-

3. OBSERVATIONS

3.1. Tree categorisation

3.1.1. The Jacobs survey records 86 individual trees (2 A category, 62 B category and 22 C category) and 12 C category tree groups.

3.1.2. 29 of the Jacobs B category trees are identified as A category in the Cheshire Woodlands survey. 11 of the Jacobs C category trees are identified as B category, or are part of a B category group, in the Cheshire Woodlands survey. 10 of the Jacobs C category groups are part of a B category group in the Cheshire Woodlands survey. The two Jacobs C category understorey groups are integral to the visual integrity and long-term sustainability of the Cheshire Woodlands A category woodland.

3.1.3. The Cheshire Woodlands survey identifies around 25 additional A and B category trees that are not assessed individually in the Jacobs survey, and with their sizes far exceeding the maximum measured height of 6 metres and estimated maximum stem diameters of 150mm, these 25 trees are not included in their C category understorey groups G11 and G12.

3.2. Root Protection Areas (RPA)

3.2.1. The Jacobs stem diameter measurements and RPA radii are listed in the Tree Schedule at Appendix A of the CEC Arboricultural Impact Assessment and Arboricultural Method Statement (AIA).

3.2.2. An initial comparison of the Cheshire Woodlands measured RPA radii and the Jacobs RPA radii for 42 of the higher quality A and B category individual trees, shows that 14 (30%) are within a range of tolerance from 10% to more than 50% tolerance.

3.2.3. The AIA suggests that the effects of existing site conditions on RPAs has been taken into consideration, and acknowledges that there is unlikely to be any root growth beneath the public highway on the west side of the trees, or within the pond to the east.

3.2.4. The Jacobs Tree Survey Report states *'The extent of the RPA is calculated in accordance with BS5837:2012, and is an important metric for understanding the impact a proposal will have on tree removal and retention and how to protect those trees retained.'* And adds *'An RPA provides a notional circular buffer around a given stem based on the stem diameter taken at 1.5m. However, this is not necessarily representative of a tree root system e.g. the roots may extend beyond the RPA boundary on one side and remain inside it on the opposite. The root network extent is dependent on many factors including species, age, soil conditions, topography and exposure etc. The assessment has not taken consideration of these above and shows RPAs as an indicative circular form as per the BS5837:2012 guidance.'* (My underlining).

3.2.5. BS5837 advises *'Where pre-existing site conditions...indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution.'*

3.2.6. The initial indicative RPAs of many of the surveyed trees extend into the public highway and/or the pond, so could not be said to reflect a soundly based arboricultural assessment of likely root distribution.

3.3. Veteran trees

3.3.1. The Jacobs tree survey states *'The Jacobs qualified arboriculturists did not identify any trees during survey which they considered ancient or veteran.'*

3.3.2. Several oak and willow trees with veteran characteristics have been identified within the survey area and, subject to more detailed assessment and where appropriate, will be uploaded in due course to the Woodland Trust's Ancient Tree Inventory for validation.

3.4. Survey methodology

3.4.1. BS5837 advises:

- *'Trees growing as groups or woodland should be identified and assessed as such where the arboriculturist determines that this is appropriate.'*
- *'...an assessment of individuals within any group should still be undertaken if there is a need to differentiate between them'*
- *The term 'group' is intended to identify trees that form cohesive arboricultural features either aerodynamically..., visually..., or culturally, including for biodiversity'*

3.4.2. On the basis of this advice, the Cheshire Woodlands survey identifies and assesses the trees in the area between the footpath bordering the pond and London Road North as 'woodland'. A rationale for this approach is included in section 6 of the Cheshire Woodland's Report CW/11044-R.

3.4.3. The Jacobs survey describes the 'study area' as a *'tree belt with an understorey of holly, hawthorn and hazel'*, acknowledges that *'the value of the trees surveyed lies in the collective rather than the individual'* and adds that the trees *'as a collective, greatly contribute to the local landscape'*.

3.4.4. Contrary to BS5837 guidance, and their own description of the 'tree belt', the Jacobs survey identifies the principal woodland trees as individuals, with the understorey assessed as two groups.

3.5. Tree removals

3.5.1. In the AIA, 27 individual B category trees, 4 C category individual trees and sections of 2 C category groups are identified for removal to facilitate construction. 11 of these B category trees are identified as A category in the Cheshire Woodlands survey; one is described as having veteran features.

3.6. Retained trees

3.6.1. The AIA lists only 5 individual B category trees and one individual C category tree for retention with *'no impact'*. These are trees that are recorded in the tree survey but unaffected by the development. As they are outside the work area they can be protected during construction in accordance with BS5837.

3.6.2. 2 individual A category trees, 30 individual B category trees, 17 individual C category trees and 10 C category groups are variously described as *'impacted'* or *'encroached'* by the proposed construction works, and all are described as *'compromised and likely lost'*. 15 of these B category trees are identified as A category in the Cheshire Woodlands survey, and 5 of the C category pond-side trees are identified as B category and having veteran characteristics.

3.6.3. The AIA accepts that the *'impacted'* trees cannot be protected during construction in accordance with BS5837, will suffer damage to their rooting environment, and their long-term sustainable retention is uncertain and cannot be assured.

3.6.4. The AIA states *'It is the view of Jacobs arboriculturists that trees indicated as encroached are viable for retention (in most cases)'* but without any reference to detailed assessments of construction impacts on their modified RPAs.

3.6.5. In the absence of more detailed assessments of the impacted/encroached trees, their continued health and life expectancy should be considered as under threat from development for the purposes of Local Plan Policy SE5.

3.7. Trees T6 and T47

- 3.7.1.** Table 2.4 of the AIA lists trees T6 and T47 - the only A category trees in the Jacob's survey – as *'compromised but retainable'* subject to a 4m crown reduction.
- 3.7.2.** The AIA advice is that both trees *'could be retained, despite suffering damage to their rooting environment', 'any significant damage will be avoided if the AMS is followed and tree protection measures are installed correctly', and '....the trees should only suffer minor root damage and therefore can be retained with a long useful life expectancy.'* This without the benefit of a detailed assessment on the basis of modified RPAs, and a reasoned justification for the proposed crown reduction works.
- 3.7.3.** The AIA advice is entirely at odds with the RAG Assessment, which concludes *'.....T6 and T47 are both situated close to the proposals and, as such, are significantly impacted by the proposals.....such significant canopy reduction works, and proposed root disturbance, is likely to result in both items being pushed into terminal decline.'*

3.8. Mitigation

- 3.8.1.** The AIA concludes *'It is proposed to replace the trees which will be removed to facilitate the proposals with off-site planting at Walnut Tree Farm.'* (My underlining).
- 3.8.2.** Local Plan Policy SE5 does not distinguish between *'loss of'* and *'threat to the continued health and life expectancy'* of *'trees that provide a significant contribution to the amenity, biodiversity, landscape character or historic character of the surrounding area'*.
- 3.8.3.** SE5 adds *'Where such impacts are unavoidable, development proposals must satisfactorily demonstrate a net environmental gain by appropriate mitigation, compensation or offsetting'*. (My underlining).
- 3.8.4.** Mitigation solely for the removed trees, and which ignores the additional impacts on the impacted/ encroached trees, is not in accordance with Policy SE5.

4. CONCLUSIONS AND GROUNDS FOR OBJECTION

- 4.1.** There is significant uncertainty around the accuracy and reliability of RPA data in the tree survey.
- 4.2.** Identification and assessment of the majority of the principal trees as individuals rather than as a group or woodland is not in accordance with BS5837.
- 4.3.** The tree quality assessment appears to have consistently undervalued many of the trees.
- 4.4.** Several significant trees within the survey area have not been identified and assessed.
- 4.5.** The indicative RPAs do not reflect a soundly based arboricultural assessment of likely root distribution.
- 4.6.** There are trees with veteran characteristics within the survey area, which require more detailed evaluation.
- 4.7.** In the tree survey, all of the principal trees within the work area are either identified for removal or listed as *'impacted'*. In the RAG, all of the principal trees within the work area are either identified for removal or listed as *'compromised and likely lost'*
- 4.8.** There is insufficient information to inform reasoned judgments on removal, retention or management of the *'impacted'* trees, which can only be made on the basis of modified rather than indicative RPAs.
- 4.9.** In the absence of detailed assessments of the construction impacts on the *'impacted'* trees, their continued health and life expectancy can only be classed as *'under threat from development'* for the purposes of Local Plan policy SE5.
- 4.10.** The combined impacts of the proposed tree removals and the threat to the continued health and life expectancy of the *'impacted'* trees on the amenity of the site and the surrounding area cannot be justified in the context of Local Plan policy SE5.

4.11. There is contradictory advice around the removal, retention and management of the A category trees T6 and T47.

4.12. Mitigation that ignores the 'impacted' trees is not in accordance with Local Plan policy SE5.