

# Sandown Park Racecourse, Esher

## 11932\_R10b\_Arboricultural Specialist Statement

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### 1.0 Introduction

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- 1.1 This statement has been prepared to address the following matters in relation to arboriculture and the Appeal process for Sandown Racecourse, Esher:
- Public consultation responses (See Section 3)
  - Statement of Case prepared by Elmbridge Borough Council (See Section 4)
  - Summary of degree of “harm” resulting from the proposal (See Section 5)
- 1.2 This statement has been prepared by Jamie Pratt, a suitably qualified Associate Arboricultural Consultant at Tyler Grange Group Limited. Jamie has 10 years’ experience in both the management of trees and trees within the planning system. Jamie is a professional member of the Arboricultural Association and holds and BSc Honours degree in Arboriculture.

### 2.0 Context of Statement

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- 2.1 This statement is written in the context of the submitted arboricultural planning material which includes:
- A Preliminary Arboricultural Impact Assessment (Core Document Ref CD5.57), which includes details of:
    - the local and national arboricultural planning policy context;
    - the tree-related designations including Tree Preservation Orders and Ancient Woodlands (note that a TPO has since been administered to tree numbers T11, T12, T13 and T14 under TPO ref. EL:19/55);
    - the findings of the tree survey;
    - a preliminary impact assessment of the proposed development with respect to arboriculture (including the likely extent of tree removals, impacts towards trees to be retained and measures for mitigation and compensation).
  - Arboriculture Technical Appendix to the Appeal Statement of Case (Report ref. 11932\_R006b dated 25<sup>th</sup> March 2020), which details:
    - Arboricultural work undertaken to date
    - reasons to support the scheme
    - benefits of the proposal
    - responses to the reasons for refusal

- 2.2 Following submission of the tree survey and Preliminary Arboricultural Impact Assessment report, the tree survey was updated in August 2020. Changes to the survey data predominantly included the downgrading of tree categories where some trees had declined since the initial survey. Appendix 1 of this statement details the changes identified during the survey update and confirms that the submitted Preliminary Arboricultural Impact Assessment report reflects an up-to-date account of the arboricultural matters to inform the Appeal process.

### **3.0 Public Consultation Responses**

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- 3.1 Rapleys LLP provided a summary of concerns raised by interested party representations relating to arboriculture, as listed below:

- The removal of trees (TPO) on the nursery relocation site would be illegal.
- Loss of trees (some of which have TPOs).
- Replacement trees will take 20 years to mature.

- 3.2 Taking each item above in turn, the following responses are set out below:

- The proposed development does not require the removal of any trees subject to a Tree Preservation Order. There are no Tree Preservation Orders administered to trees on the nursery site. This is confirmed through the Preliminary Arboricultural Impact Assessment submitted as part of the planning application.
- The development will require a degree of tree loss to accommodate the development. The harm caused by this has been determined by categorising trees based on their value towards visual amenity. The extent of removal has been minimised where possible as part of an interdisciplinary design process to ensure that no trees of 'high' arboricultural value will be removed. Those that require removal are of either 'low' or 'moderate' arboricultural value.
- Replacement trees will be provided to compensate for unavoidable tree losses as part of various new soft-landscaping schemes for the development. New tree planting will take time to establish and mature, however, as part of subsequent detailed landscaping designs, tree planting stock can include advanced nursery stock sizes to ensure that replacement planting offers immediate greening / presence in the landscape at planting.

### **4.0 Response to Elmbridge Borough Council's Statement of Case**

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- 4.1 The Statement of Case prepared by Elmbridge Borough Council has been reviewed to identify any concerns relating to arboriculture.

- 4.2 Only one issue has been raised relating to the removal of trees on proposed Site 1, which reads:

*"The potential loss of trees at the site boundary would also have a detrimental impact on the local landscape character and visual amenity. Whilst harm to the character of the area will be clearly demonstrated, the Council does not say that there will be specific, additional harm to the significance of any designated or non-designated heritage assets. The inclusion of policy DM12 in the reason for refusal was an error."*

4.3 No trees are proposed for removal at the boundary of site 1 to accommodate the proposed residential building. The submitted Preliminary Arboricultural Impact has assessed this area of the scheme in relation to the boundary trees and identifies that minor pruning works will be required to the lower canopies of trees to the north of proposed building. It is noted that the building has been offset from the boundary edge and the lower-story part of the building will sit beneath the canopies, with the higher-storey parts of the building being located outside the canopy spread of the trees. The level of pruning works will be treated sensitively with the aim to improve the overall composition / structure of what is currently an unmanaged tree line with very dense understory.

## 5.0 Summary of Degree of Harm Resulting from the Proposal

5.1 The proposed development has been assessed in terms of potential arboricultural impacts based on a review of likely tree retention, tree removal and impacts towards retained trees to facilitate the development.

5.2 The trees that make a substantial contribution to the visual amenity of the site's locale including protected trees, high value trees and ancient woodland can be retained as part of the development, together with moderate value trees, wherever this has been possible in the indicative design process. Veteran trees identified can also be retained and remain unaffected by the development, subject to the adoption of sensitive implementation of development as addressed within the submitted Preliminary Arboricultural Impact Assessment report.

5.3 The total number of trees to be removed in the 'higher-tier' of the moderate value classification is 16no. The location of these trees is illustrated at Appendix 2 and further detailed in the table below. This includes trees of moderate quality (sub-category 1) and / or quality and value (sub-category 1 and 2). The initial strategy for soft landscape planting suggests that approximately 225 new trees will be planted as part of the proposals.

Tree Number / Description	Grading	Additional comments
T89 / mature horse chestnut located on Site 3. Previously crown lifted.	B1.2	N/a
G9 / formally planted mature Norway maple group located on Site A.	B1.2	Removal of 4no. trees within the group, with 6no. trees to be retained and management in perpetuity due to location next to proposed saddling boxes / parade ring.
G22 / early mature to mature amenity planting at boundary of nursery located on Site 5.	B1.2	Removal of 11no. trees within group with main larger oak tree within group retained.

5.4 The development will require the removal of moderate to low value grade trees only. The retention of higher value tree cover has been maximised where possible however there are instances where the removal of moderate value trees is unavoidable to accommodate the scheme parameters. In response to these required tree losses, compensatory measures will be adopted to include new tree planting to accord with best practice.

- 5.5 The development proposals are therefore considered supportable in its outline form in terms of its impact towards the site's existing arboricultural features.

**Statement of Truth**

The evidence which I have prepared and provide for this appeal reference APP//K3605/W/20/3249790 in this written statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Signed: Jamie Pratt FdSc BSc (Hons) MArborA

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**Appendix 1 - 11932\_R08\_Arboricultural Note (Tree Survey Update)**

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# Sandown Park Racecourse, Esher

## 11932\_R08\_Arboricultural Note (Tree Survey Update)

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### 1.0 Introduction

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- 1.1 This Note has been prepared by Tyler Grange Group Limited to provide a summary of a BS5837:2012 tree survey update completed at Sandown Racecourse.
- 1.2 This survey update has been completed to ensure the emerging Appeal for the refused planning application considers the current baseline context of tree cover within the proposed application areas.
- 1.3 The previous survey was completed in November 2018 and the details of the findings and assessment of the scheme proposals are included in the submitted Preliminary Arboricultural Impact Assessment (AIA) report (ref. 11932\_R02a\_JP\_LP dated 15<sup>th</sup> February 2019). The updated tree survey was completed on 19<sup>th</sup> August 2020. The brief was to verify the previous tree survey data, recorded updates where required and identify any resulting changes from assessment made within the submitted AIA report.

### 2.0 Updates to Previous Tree Survey

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- 2.1 The table below listed the updates for each tree / group and whether this has any implication towards the scheme submitted with respect to the arboricultural assessment. All updates have been included on the updated Tree Constraints Plan (ref. 11932/R01b) and the Tree Survey Schedule (11932/TSS01b) enclosed to the rear.

Tree / Group Number	Site	Updates recorded	Scheme Implications
T22	Site A	Downgraded from value class CAT B to CAT C. Removal is also recommended to benefit growth of higher value T20.	None - shown as removed as part of scheme proposals.
T25	Site A	Downgraded from value class CAT B to CAT C due to die-back observed in canopy.	None - shown as removed as part of scheme proposals.
T31	Site B	Removed. Previously observed as a CAT U dead tree	None - shown as removed as part of scheme proposals.

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Tree / Group Number	Site	Updates recorded	Scheme Implications
T42	Site 5	Removed. Previously observed as CAT C low value tree with poor form.	None - shown as removed as part of scheme proposals.
T57	Site 5	Downgraded from value class CAT C to CAT U due to die-back observed in canopy.	None – shown as retained within submitted scheme proposals. Now recommended for removal due to poor condition.
T63	Site 3	Downgraded from value class CAT C to CAT U due to die-back observed in canopy.	None - shown as removed as part of scheme proposals.
T99	Outside application sites (near Site 5)	Downgraded from value class CAT B to CAT C due to die-back observed in canopy.	None – shown as retained within submitted scheme proposals.
T107	Site 4	Downgraded from value class CAT B to CAT C due to die-back observed in canopy.	None – shown as retained within submitted scheme proposals. Die-back likely to worsen therefore removal / replacement may be considered subject to planning consent.
G15	Car park optimisation area	1 low value car park tree added to group.	None – shown as retained within submitted scheme proposals.
G41	Adjacent to Site 3	Downgraded from value class CAT B to CAT C due to die-back observed in canopies across all tree in group.	None – shown as retained within submitted scheme proposals. Die-back likely to worsen therefore removal / replacement may be considered subject to planning consent.
G43	Site 4	Upgraded value class of 2 silver birch trees in group from CAT C to CAT B.	None - shown as retained as part of scheme proposals.

### 3.0 Conclusion

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- 3.1 The survey was successfully verified and there were minimal updates recorded. The updated baseline has also been reviewed alongside the submitted AIA report. No reassessment or changes in judgement as set-out in the submitted report are required as a result of the updated survey. The AIA report therefore reflects an up-to-date account of the arboricultural matters to inform the Appeal process.
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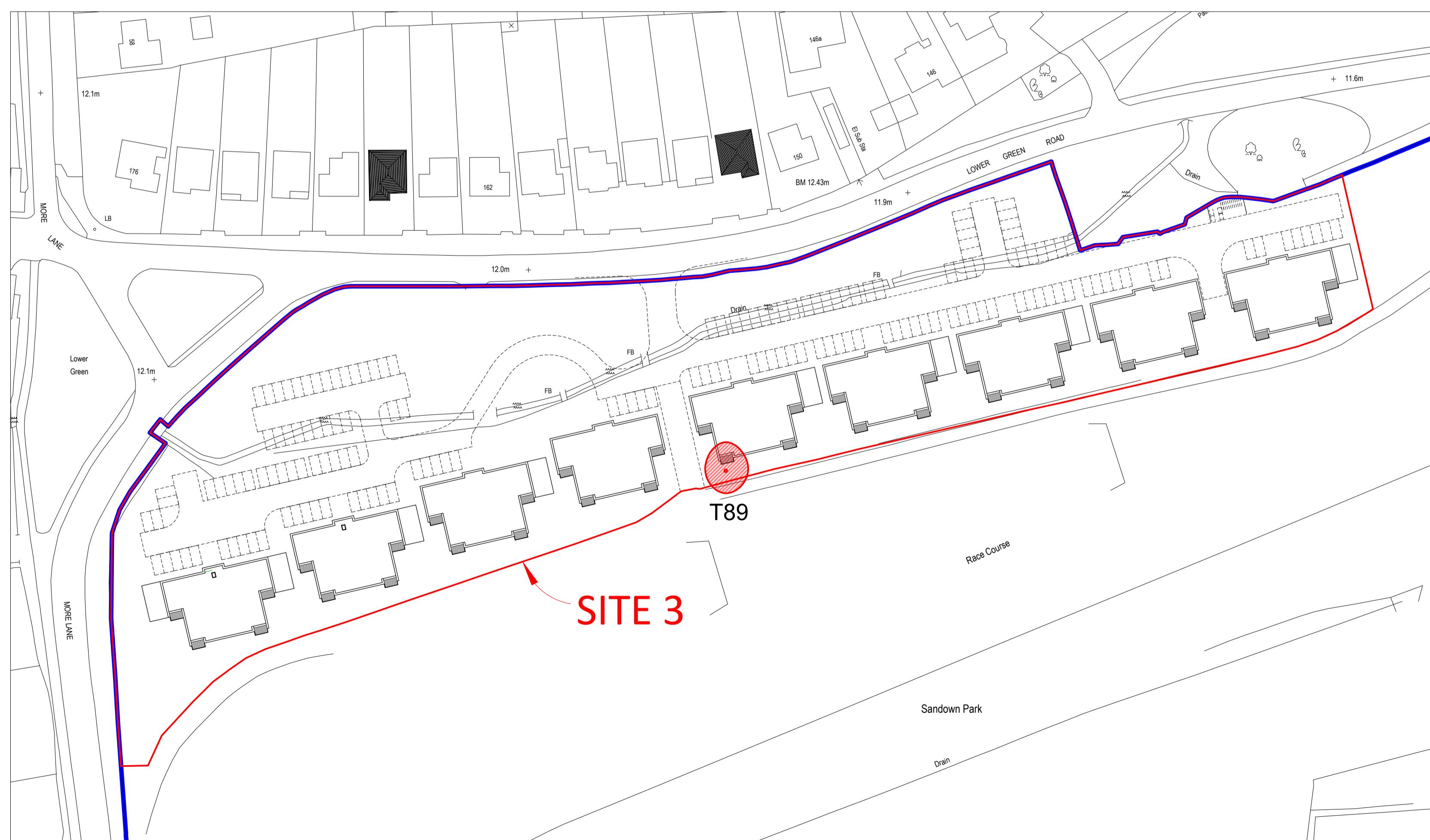
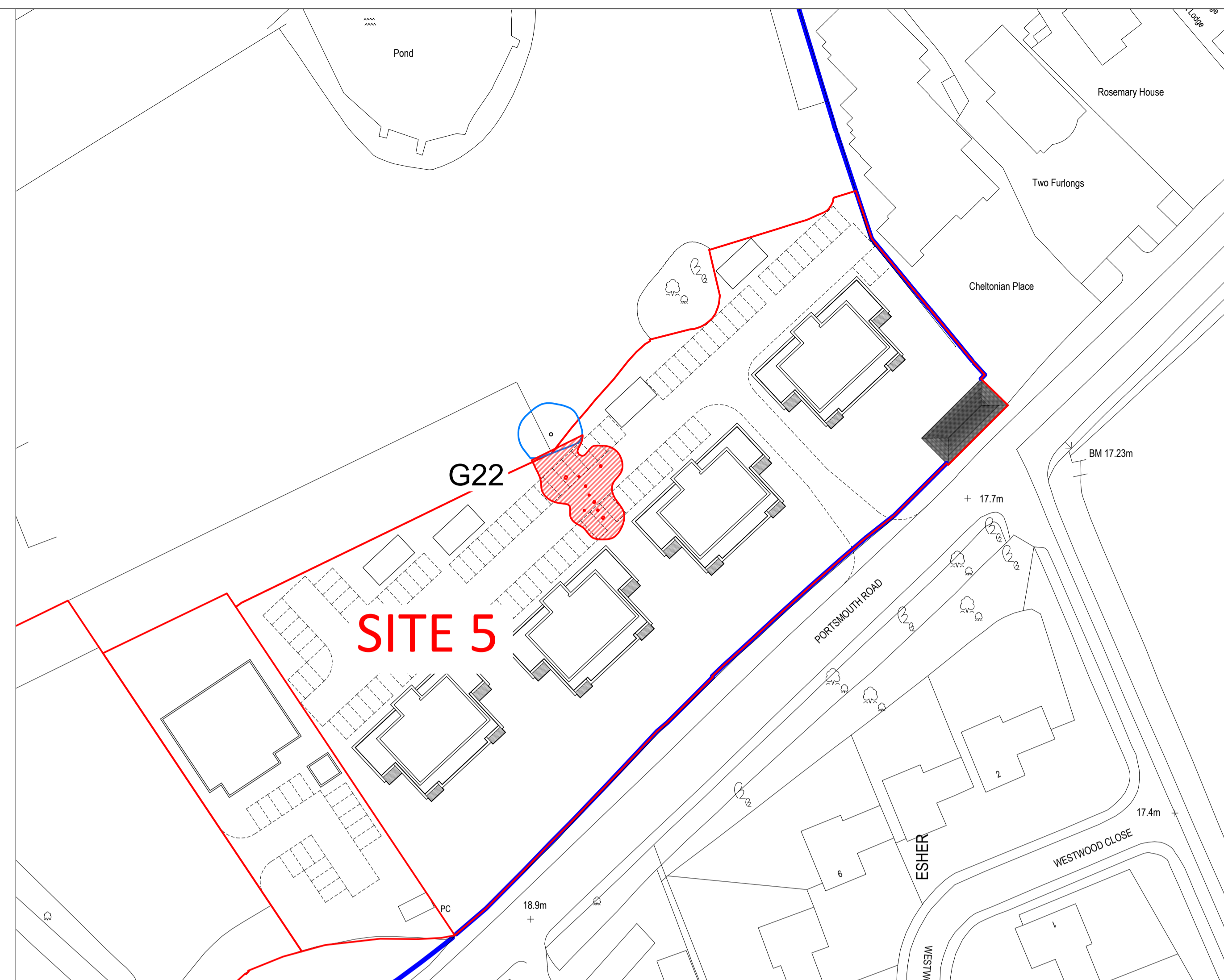
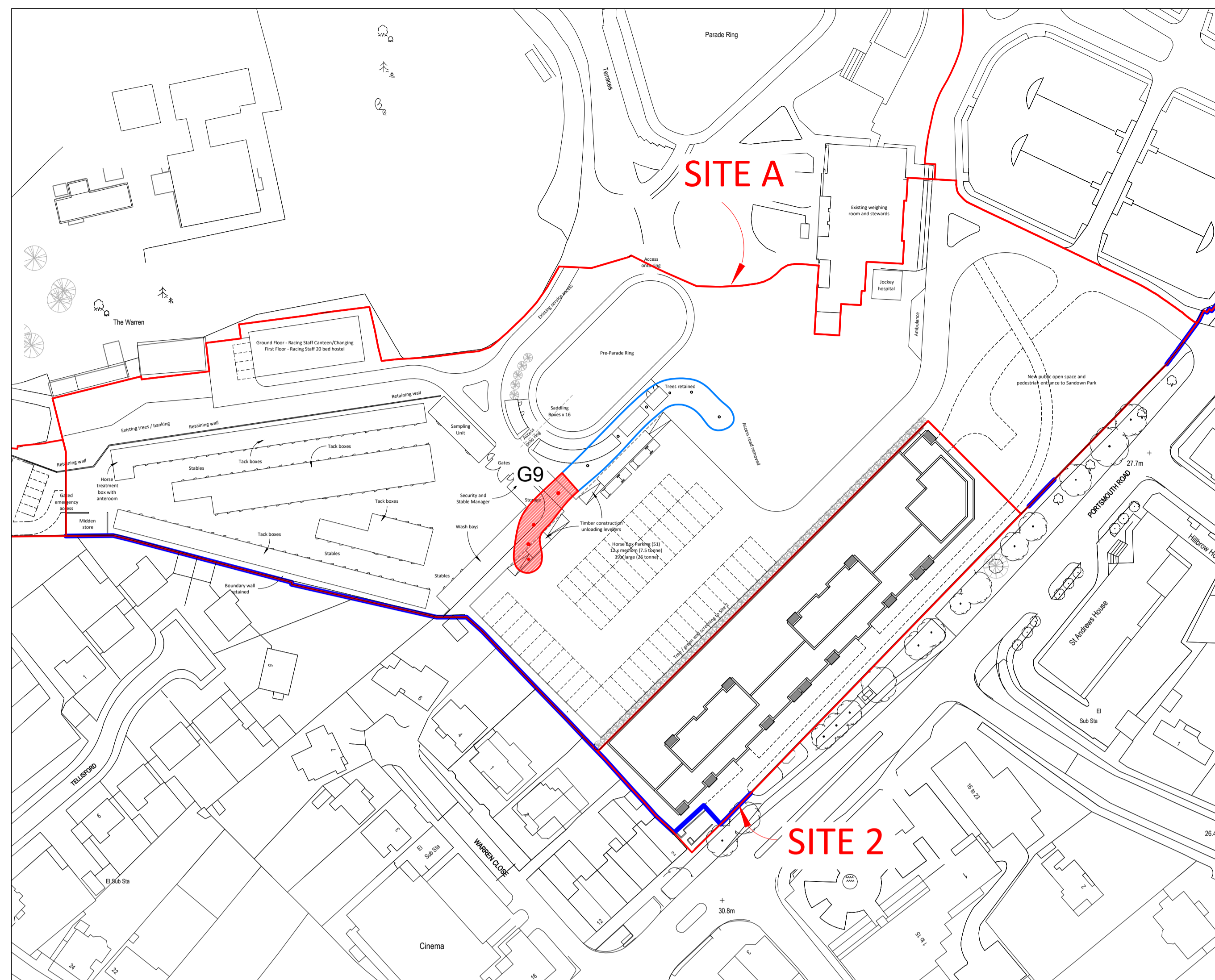
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**Appendix 2 – 11932\_P17\_Tree Removal Plan (T89, G9 and G22)**

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- Key:
- Site Boundary
  - JCR Ownership Boundary
  - Category B1 / B1.2 Trees to be Removed
  - Retained part of Groups to be Partially Removed

Project Name  
Sandown Park Racecourse, Esher - Sites 4 and E2

Drawing Title  
**Preliminary Tree Retention and Removal Plan (T89, G9 and G22)**

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Drawn by JP	Revision
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