

Main Statement of Case Appendix 10

# ARBORICULTURAL STATEMENT OF CASE TYLER GRANGE

# **Sandown Park Racecourse, Esher**

## **11932\_R006b\_Arboriculture Technical Appendix**

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### **1.0 Introduction**

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- 1.1 This document forms a technical appendix to the Appeal Statement of Case in respect of a planning appeal against the refusal of a planning application for the proposed development at Sandown Racecourse, Esher.
- 1.2 This technical appendix relates to the Arboricultural matters and sets-out the following:
- the work undertaken to date;
  - the reasons to support the scheme;
  - the benefits of the proposal; and
  - the responses to the reasons for refusal.

### **2.0 Work Undertaken to Date**

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- 2.1 A survey of the existing trees present on and within influence of the application sites was completed from 20th to 22nd November 2018. The survey was completed in accordance with the British Standard 5837 (2012) 'Trees in relation to design, demolition and constructions – Recommendations' (Core Document CD3.36) which is understood as industry best practice for assessing trees in relation to new development proposals.
- 2.2 A Preliminary Arboricultural Impact Assessment (Report ref. 11932\_R02a\_JP\_LP dated 15<sup>th</sup> February 2019) (Core Document CD5.57) was submitted with the planning application. The report 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).
- 2.3 Given that over 12 months have passed since the original tree survey was completed, a site visit will be completed to verify the current tree survey baseline data (and to identify any changes) ahead of the appeal and submission of evidence.

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### 3.0 Reasons to Support the Scheme

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- 3.1 The development does not require the removal of:
- Trees subject to a Tree Preservation Orders currently administrated on the site;
  - Trees located within a designated Ancient Woodland; or
  - Tree categorised as high value (Category A).
- 3.2 The trees that make a substantial contribution to the visual amenity of the site's locale (as listed above) can be retained as part of the development, together with moderate value trees, wherever this has been possible in the indicative design process. A detailed account of the expected tree removal is provided at **Appendix 1** (extracted from the submitted arboricultural report).
- 3.3 Expected tree removals to accommodate the proposed development include those of low (Category C) and moderate (Category B) value, which provide a reduced contribution to the visual amenity of the site.
- 3.4 A detailed account of the indicative layout of the development in relation to impact towards retained trees is included at **Appendix 2** (as extracted from the submitted arboricultural report).
- 3.5 The indicative layout in its outline form demonstrates a response to the above and below ground constraints of trees (rooting environment, tree canopies and tree shading) that will be retained as part of the development. Potential adverse effects towards the physiological and structural condition of the retained trees as result of the development has been minimised as far as possible.
- 3.6 Where it has not been possible to entirely avoid the constraints of retained trees, recommendations to reasonably mitigate this impact has been provided (See **Appendix 2**).
- 3.7 The level of tree retention suggests that the development will not adversely affect the appearance or character of the site's treescape and its contribution to visual amenity. The proposal therefore demonstrates conformity with local planning policy DM6 as well as section 175 (c) of the NPPF where relating the Ancient Woodland and Veteran Trees.

### 4.0 Benefits of the Proposal

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- 4.1 With respect to providing arboricultural benefits, the proposed development presents the following opportunities:
- New tree planting as part of high-quality soft landscape schemes;
  - Improvements to the rooting environment of veteran trees through soil decompaction and replacement of hard surfaces to soft landscaping; and
  - Enhancement of existing site-wide arboricultural features, including woodlands, other tree groups, through implementation of a Landscape and Ecological Management Plan.
- 4.2 Arboricultural betterment through new planting is viewed favourably by EBC's Tree Officer specifically regarding site 3 and site 5 based on preliminary soft-landscape designs submitted

for these sites. The potential improvements to the rooting environment of the veteran trees within Site A is also specifically viewed favourably by EBC's Tree Officer.

- 4.3 As this proposed development is largely presented in outline, the above aspects will be considered further as part of detailed design. The details of new tree planting and enhancements to existing features can be secured via suitably worded conditions as recommended within EBC's Committee Report (Core Document CD7.3.)

## **5.0 Responses to Reasons for Refusal**

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- 5.1 Arboriculture was not considered as a reason for refusal by the Committee.
- 5.2 EBC's Senior Tree Officer raised no arboricultural concerns with regards to any site except for the development proposals on sites 1 and A. Notwithstanding the concerns raised, the concluding remarks relating to arboriculture within EBC's Committee Report (Core Document CD7.3) state:

*"as the site layouts are currently only indicative, and the detailed layouts would be subject to a future application, the raised concerns with regards to the relevant trees would need to be addressed at that stage. Should the issues be resolved by the amended site layouts, the Tree Officer would withdraw its objection on arboricultural grounds to the proposals on Sites A and 1. On this basis, it is considered that the outline permission should not be withheld due to the arboricultural concerns to be addressed at a later stage"*

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## Appendix A – Likely Extent of Tree Removal and Opportunities arising from Compensation

### Site 1

BS5837 Category Grading	Tree / Group Number	Description of Impact	Mitigation / Compensation Opportunities
B	G2	<p><b>Tree Removal:</b> No tree removal is considered necessary to accommodate the outline layout.</p> <p><b>Tree Pruning:</b> Minor crown lifting / remedial pruning works may be required at southern edge of group to reduce canopy encroachment into the site and improve structure of canopy edge. Active management (including thinning) of the group's dense understorey and regenerating sycamore to improve structure where adjoining the site.</p>	<p>Proposed building edge at the northern boundary is contained to the footprint of existing horse stable buildings to avoid tree removal within the group.</p> <p>The proposed building has been sufficiently off-set from a high value tree (T4) located the east of the northern tree line. The proposed building uses a single-storey structure where adjoining the tree group to provide a clearance from the new building edge and the southern canopy of the group. The single-story building will comprise bin and bike storage areas. Cross-sectional drawings including with the application (Design and Access Statement) illustrate this clearance based on the current canopy clearance of the tree and its proximity to the indicative building elevations.</p> <p>While no tree loss is expected, new tree planting could be achieved within soft-landscaped areas and around the car parking spaces / main building to offer a potential net-gain in tree cover on this site.</p>

Site 2

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation / Compensation Opportunities
C	G12	<p><b>Tree Removal:</b> Partial removal of the linear screen planting belt adjoining Portsmouth Road.</p> <p>G12 predominantly includes dense screen of semi-mature low-quality conifer species with limited future potential in terms of amenity.</p>	<p>Removal of the structure planting is unavoidable to accommodate the development and its connection to Portsmouth Road. G12 is considered an incongruous feature that will begin to mature and detract from mature street tree scene located off-site along Portsmouth Road.</p> <p>A new landscaping scheme will be provided along southern edge; however, this will be less densely established in order to provide visual links / and overall permeability from the residential development on to Portsmouth Road.</p>

### Site 3

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation / Compensation Opportunities
B	T62, T63 and T89	<p><b>Tree Removal:</b> Removal of early-mature ornamental planting established to south of existing residential buildings due to direct conflicts with proposal layout of new residential buildings.</p> <p><b>Tree Pruning:</b> No major pruning works to retained trees are considered necessary at this outline stage.</p> <p>Minor pruning works may be required to trees T74 and T87 where these are retained adjacent to a proposed building and the access road.</p>	<p>The layout has responded to presence of moderate and high value trees to maximise their retention. This is demonstrated by siting the access to avoid principal tree cover to the north of the development and placement proposed buildings at suitable distances from high / moderate value trees. The car parking / access road utilises the removal of lower value tree cover to accommodate development space.</p> <p>The development will include a new landscaping scheme across the proposed residential areas of the site and to the north of between the development and Lower Green Road. An Illustrative Landscape Strategy Plan Site 3 - edp5237_d011 (submitted separately as part of the application) illustrates the opportunities for new tree planting across the site. Areas of low value, unmanaged scrub is present across to the north of the site that can be enhanced and improved through retention and higher quality specimens, thinning of dense scrub areas and replacement planting with high-quality stock.</p>
C	T68, T76, T79, T80, T81, T86, T88, T90, G26, G27 (partial), G29, G30, G32 (partial), G33, G34, G36, G37, G38, G39 and G40	Removal of low value ornamentally planted trees and hedgerows established across existing residential development and naturalised scrub / low value trees densely established to north of development to accommodate new parking areas and two access points from Lower Green Road.	

Site 4

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation / Compensation Opportunities
C	G44 and G45	<b>Tree Removal:</b> Removal of self-seed willow along eastern boundary to facilitate new soft-landscaping treatment adjoining Station Road. Removal of low-value landscaped strip along southern boundary to accommodate parking and new boundary treatment.	<p>The building requires the removal of low value trees only with moderate value tree being retained to the front of the building.</p> <p>The development will include a new landscape scheme comprising of new street tree planting within the proposed parking areas and at the site boundaries. The removal and replacement of low value self-set trees (particularly those adjoining Station Road) will provide a higher-quality soft-landscape setting.</p>



Site 5

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation / Compensation Opportunities
B	T36, T38, T41, T54, G20 (partial) G22 (partial)	<p><b>Tree Removal:</b> Removal of established ornamentally planted trees within curtilage of existing nursery due to direct conflicts with proposed dwellings and car parking areas.</p> <p><b>Tree Pruning:</b> Potential minor pruning works to north-western canopy side of tree T37 and western side of T35 given their proximity to the proposed residential building. T37 has been previously heavily crown reduced.</p>	<p>The layout has sought to retain the larger horse chestnut (T37) located internally within the site. The larger English oak established within G22. Moderate value trees adjoining Portsmouth Road will also be retained to conserve the amenity provision towards the road context. It is acknowledged, through pre-application consultations with EBC Tree Officer, that there is a potential preference to remove trees T37, T50 and T51 and provide replacement trees set further back from the new development could be preferable. Given the outline nature of the scheme, my suggestion at this stage is to determine their retention or removal / replacement as part of detailed design proposals, where the potential social proximity issues can be confirmed in the context of greater design detail.</p>
C	T39, T40, T42, T44, T46, T47, T48, T53, G18, G21, G23	<p>Removal of dense area of self-seeded stock to north of the site and scattered low value ornamentally planted trees around curtilage of existing nursery site due to direct conflicts with proposed dwellings and car parking.</p>	<p>Removal of trees located further into the site are considered unavoidable to achieve a viable scheme with access and car parking.</p> <p>An Illustrative Landscape Strategy Plan Site 5 -edp5237_d012 (submitted separately as part of the application) illustrates the opportunities for new tree planting across the site. The principles of new landscaping include additional tree planting to Portsmouth Road to maintain character of local views, new tree planting to the eastern boundary to maintain the character of views from Portsmouth Road, enable filtered views through to the racecourse and additional tree planting within the site.</p>

Site A

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation / Compensation Opportunities
B	T10, T15, T16, T17, G9 (partial), G14 (1no. tree)	<p><b>Tree Removal:</b> Removal of moderate value ornamentally planted trees within existing areas of soft-landscaping due to direct conflicts with proposed development indicative layout and access routes.</p> <p><b>Tree Pruning:</b> No major tree pruning works are considered necessary at this outline stage. Minor pruning / management works to existing understory / soft-landscaping may be required to the north of proposed staff facilities building.</p>	<p>As the operational hub for the racecourse, all existing facilities will be demolished and replaced with improved facilities / arrangements to horse racing standards. This includes significant upgrades to existing facilities to ensure the racecourse can remain functional whilst facilitating the proposed residential development. The scheme is contained to the existing footprint of the existing operational area to avoid tree removals within the Ancient Woodland Designation to the north (including those subject to a Tree Preservation Order).</p> <p>The indicative layout also demonstrates the retention of a valuable line of mature trees (T18 – T26) located centrally within the site. In order to accommodate the required operational facilities (visitor / horse box parking areas, new stables, ancillary facilities) the hotel will be demolished, and the pre-parade ring will be relocated further north, closer to the main events area to the south of potential veteran sweet chestnut trees T11 – T14, which are also to be retained.</p> <p>The potential tree losses are therefore considered unavoidable and limited to internal, moderate value stock, that has established since the planting of the site's initial soft-landscape scheme. In order to replace the likely tree losses, the proposed development will include a new soft-landscaping scheme that can be prepared once the layout is further refined / determined as part of detailed designs.</p>
C	T6, T7, T8, T9, G10, G14 (partial)	Removal of low value ornamentally planted trees within existing areas of soft-landscaping due to direct conflicts with the proposed indicative layout and access routes.	

#### Site B

BS5837 Category Grading	Tree Number	Description of Impact	Mitigation and Compensation Opportunities
B	G16	<b>Tree Removal:</b> Removal of moderate value group of established sycamore due to direct conflicts with proposed hotel building.	The removal of G16 is considered unavoidable to accommodate the new hotel in this location. While the trees have matured since initial landscape planting, they are unremarkable and do not contribute to the visual amenity of the site's locale.
C	T29, T30, T32, T33 T34, G15 (partial) and G17 (partial)	<b>Tree Removal:</b> Removal of low value recently planted trees around car parking / access road.	The impact is therefore considered moderate from an arboricultural perspective subject to implementation of compensatory planting prepared as part of detailed design.

#### Site C

BS5837 Category Grading	Tree Number	Description of Loss	Mitigation and Compensation Opportunities
C	T110, G47 and G48	<b>Tree Removal:</b> Potential removal of low value ornamental trees and shrubs established within curtilage of existing go-carting track entrance.	None considered necessary due to the negligible value of the tree cover to be removed.

#### Site D

BS5837 Category Grading	Tree Number	Description of Loss	Mitigation and Compensation Opportunities
C	T108 and T109	<b>Tree Removal:</b> Potential removal of likely self-set and small stature trees.	None considered necessary due to the negligible value of the tree cover to be removed.

## Appendix 2 – Potential Incursions within Root Protection Areas of Retained Trees

Site Name	Tree / Group Number	Description and Potential Construction Mitigation
Site 1	T4	Proposed car parking is located at the fringe of the RPA. The RPA is re-shaped around the footprint of the existing stables and a retaining wall. There are unlikely to be any major roots within this area given the distance away from the tree and the presence of hard structures in this area. As part of the later detailed design, the layout of the car parking can potentially be tweaked to avoid this section of the RPA or a sensitive 'no-dig' surface can be adopted.
Site 3	T74 and G31	The proposed access road is routed between trees T74 and G31. There is an existing access road in this area which will require sensitive demolition where within the RPA. The requirement for 'no-dig' surfacing within the section of road between the trees will be determined as part of detailed design.
Site 5	T37	A proposed building is located in the northern part of the RPA and the proposed access is located within the western part of the RPA. An existing hard-surface is currently present across the entire RPA which will require sensitive demolition. The requirement for specialist building foundations and the 'no-dig' surfacing for the new access road will be determined as part of the detailed design phase.
	T56 and T57	Car parking is proposed in the northern parts of the RPAs. The northern parts of the RPAs are however currently used for parking (on grass) and therefore a degree of soil compaction is likely to have already occurred. The requirement for 'no-dig' surfacing for parking areas where located within the RPAs will be determined as part of the detailed design.
	G22 and T45	Car parking areas are proposed within the southern parts of the RPAs. The requirement for 'no-dig' surfacing for parking areas where located within the RPAs will be determined as part of the detailed design.
Site A	T11, T12, T13 and T14	The pre-parade ring will be relocated to the south of the trees into an area of existing amenity grassland. The relocation of the pre-parade ring is understood to be a fundamental part of the operational enhancement to the racecourse facilities. All proposed operational improvements are required within the defined red line boundary for site A. There is therefore no suitable alternative location for pre-parade ring without placing other surfaces / structures within this area. Given that the pre-parade ring will be a 'low impact' type of development (i.e. no hard / built development) the proposed location is considered

Site Name	Tree / Group Number	Description and Potential Construction Mitigation
		<p>most suitable, as it precludes development that could be more invasive within the RPAs.</p> <p>The surface of the ring itself will require a sensitive implementation method that avoids any long-term compaction (above that of the existing) within the RPAs. The ground level of this area must also be left unaltered, which is considered achievable at this stage as it is currently graded at approximately 1 in 30. The proposed saddle boxes (that would typically be located symmetrically around the ring) have been located outside of the BS5837 calculated RPAs. The likely extent of development within the RPAs will therefore be limited to new perimeter fencing and the ring 'track' itself, which can be mitigated through specialist construction methods as part of detailed design. There are also options to improve the rooting environment of the trees as part of the development, including:</p> <ul style="list-style-type: none"> <li>• Removal of any existing impermeable surfacing within the RPAs with replacement of permeable surfacing to increase water availability and soil aeration;</li> <li>• Decompaction of ground / soil within the RPAs, including compacted sub-bases beneath existing surfaces within the RPA and the soil across the amenity grassland to the south of the trees; and</li> <li>• Course of mycorrhizal fungi and / or fertiliser treatments (via soil injection) to improve nutrient availability.</li> </ul> <p>Further assessment work would be required to determine the appropriate treatment for the trees, however the existing hard-surface to the north, east and west of the trees together with managed grassland to the south suggests that the trees rooting environment could be improved as part the development. Long-term management / protection of the trees from the pre-parade ring activity will also need to be considered in perpetuity. Any long-term management could be set-out within a Veteran Tree Management Plan that is specific to these trees and their long-term relationship with the pre-parade ring, including prodecudred such as:</p> <ul style="list-style-type: none"> <li>• Physical tree stem / protection to avoid mechanical / pedestrian damage</li> <li>• appropriate management of the grassland within the pre-parade ring (including suitable fertilisation and reseeded, and prohibition of herbicide use)</li> <li>• periodic inspections by qualified arboricultural</li> </ul>

Site Name	Tree / Group Number	Description and Potential Construction Mitigation
		<p>consultants to avoid unsympathetic pruning management (that has already occurred) and where remedial works is required to promote longevity.</p> <p>On the basis of the above, the proposed relocation of the pre-parade is therefore not considered to pose an adverse impact towards the veteran trees despite the potential RPA incursion, as it represents a low impact type of development, that can be suitably alleviated through special construction measures, improvements to their surrounding soil environment and better long-term management.</p>
	G9	<p>The relocation of the pre-parade ring requires construction of new saddling boxes around its perimeter. The position of the saddling boxes is constrained by the RPAs of the veteran trees T11, T12 and T13 and trees within G9. In order to reduce the principle of new development within the RPAs of the veteran trees, the indicative layout shows the principle of siting the saddling boxes in spaces between the trees within G9. The aspiration at this outline stage is to retain these trees within G9 in order maintain an attractive visual barrier between the horsebox park (to the south of the parade ring) and the rear of the saddling boxes. Constructing the saddling boxes within this proximity to the trees is considered achievable at this stage given the 'small-stature' nature of the saddling box structures that can adopt a specialist construction design (i.e. no-dig foundations) to mitigate disturbance within the RPAs. The exact positioning of the saddling boxes, and their construction type, will therefore require further consideration as part of detailed design proposals.</p> <p>The indicative layout proposes new unloading levellers to be located within the RPAs to the south of the trees. The unloading levellers are located to the north of a proposed new area of hard-surfacing (which is sited outside the RPAs), where horses will be unloaded from equine transport vehicles. The unloading levellers will comprise a low impact timber construction in order to alleviate disturbance within the RPAs. The construction type, including any below ground supports, will require further consideration as part of detailed design proposals.</p>