

From: Michael Webber [REDACTED]
Sent: 01 November 2023 12:16
To: Nick Bell [REDACTED]
Cc: CORDEIRO, Francesca (IMPERIAL COLLEGE HEALTHCARE NHS TRUST)
[REDACTED]; John Beighton [REDACTED];
Neil McDonald [REDACTED]; Charlotte Meynell
[REDACTED]; Planning Planning
[REDACTED]
Subject: Planning Application References 2023/0282/P : Replacement Tree
Planting
Importance: High

Dear Mr Bell

1. Further to the recent correspondence with Mr McDonald, the Chester Terrace Residents' Association made arrangements, following the disclosure of the proposed Replacement Tree Planting programme on October 26th, to have an independent expert Chartered Arboriculturist and Arboricultural Association Registered Consultant review & to advise upon the Planning Application Reference 2023/0282/P, as it appertains to the Replacement Tree Planting.
2. We are informed that the above documents have not yet been reviewed by the Camden's Tree and Landscape Officer.
3. We would be grateful if the following comments & attachment are read & considered in conjunction with all the widespread opposition that Camden has received regarding this planning application & which has been listed on the Camden website & in any submissions which have been received separately, directly & indirectly, by Charlotte Meynell (e.g. from Richard Loftus).
4. It is clear, from the latest documents submitted by the applicant & published on the Camden website on October 26th, that the applicant is ignoring Camden & has no intention of abiding by, nor adhering to, the explicit parameters set out by Camden in their email of May 16th 2023, extract below.

5. The Chester Terrace Residents' Association considers this conduct & approach to be improper & we are vehemently opposed to the current October 26th proposed tree planting proposals for the reasons set out in the letter from Mr Stephens, copy below & attached.

6. We believe that the CEPC are endeavouring to cut corners & to short-change residents & the public at large. As Camden has unequivocally stated, **the proposed planting should include the same number of replacement trees as existing, in the same locations as existing as much as possible, and with trees of a similar height to the existing.**

7. It can be seen from Mr Stephen's report that the CEPC are improperly proposing to plant extremely small trees that will take 40 – 45 years to reach the height, breadth & maturity of the existing trees that they are planning to destroy & cut down.

8. Additionally & importantly, the calculations of future CAVAT value used in the CEPC report are suspect.

9. Moreover, it is noted, that further evidence from the CEPC to compound their efforts to ignore Camden & to do as they wish is shown in Mr Stephens' report regarding any trees dying during the first 40 years. The CEPC report states that, if trees die, they should be replaced with the same species **at the initial planting size.**

10. Meantime, as a macro point of principle, we consider, that the proposed destruction, being planned by the CEPC, to destroy & cut down 20 trees, is wholly unnecessary.

11. We firmly believe that the CEPC could easily consider alternative construction options for the repairs to the balustrade...which would not destroy the trees & thereby reflect them acting in a positive & constructive manner.

12. We therefore suggest that the Camden instruct the CEPC to consult with an alternative experienced expert & knowledgeable engineering firm so as to consider **all the options available** because the main damage to the trees is because of the access needed for a huge & unnecessary excavator (which will destroy most of the Chester Terrace Gardens, as well as all the individual trees).

13. **Two core questions arise from the proposed improper actions of the CEPC**

- **Why can't the excavator work be done from the road rather than from the garden ? &**
- **why can't a smaller excavator be used ?**

14. It is the belief of the Chester Terrace Residents' Association that the proposed repair work on the balustrade is being used by the CEPC as a Trojan Horse in order to implement a fundamentally flawed report by Longstaffe-Gowan. The needless destruction of 20 trees is felt by residents to be part of a reckless & inappropriate idea to try & return Chester Terrace Gardens to what they were claimed to be like in the 1820s. We & many others consider this to be flawed, for countless reasons... first, only horse drawn carriages existed in the 1820s – there were no cars, no coaches, no lorries nor motor bikes ; second, Regent's Park itself has fundamentally altered & dramatically changed during the last 200 years ; third, the conditions in London in 2023 are fundamentally different + the socio-economic circumstances existing today, the way of life of its residents & their composition, differs significantly from 200 years ago... + in the 1820s the trees & shrubs had just been planted in the gardens (Chester

Terrace was built in 1825) so understandably they had not yet become mature trees & mature shrubs.

15. Additionally, it should be noted, that if the flawed proposals of Longstaffe-Gowan are to be implemented then all the mature trees in Regents' Park would need to be cut down & all the hedgerows on the outer circumference of Regents' Park would need to be removed. As is readily appreciated by all experts & independent people + regulators this outcome shows, unambiguously, the distorted & warped ideas being proposed by Longstaffe-Gowan.
16. Pictures of horse drawn carriages from the mid 19th century, in Longstaffe-Gowan's report, reflect a disconnection from the real world of 2023...
17. Meantime residents are also seriously concerned at the significant & material damage to the environment + the reduction in air quality if mature trees are needlessly cut down + it will also increase the noise levels for residents from the Outer Circle Road + it will reduce the security screening that the mature trees provide the houses.
18. Additionally, efforts by the CEPC to recklessly, & without any justification, cut down trees in the gardens will undermine the Mayor of London's proposals to improve air quality in London & the WHO guidelines on air pollution.
19. We therefore seek the support of Camden to issue Tree Preservation Orders in respect of all the trees in Chester Terrace Gardens because the existing trees can be seen & enjoyed by the general public. The trees are of particular importance in terms of their size, form, & screening value + they make an important contribution to the character & appearance of this conservation area. The trees also have significance in their surroundings and have a positive & wider impact on the environment.

20. We believe that the CEPC should be encouraged to act responsibly in order to properly safeguard & protect the trees in Chester Terrace Gardens. This would have a positive impact on the surrounding environment for the benefit of the general public & for all the reasons set out above.

20. We are advised that a decision regarding this planning application cannot be made by delegated powers & that the correct process is for these planning applications to be considered by the Planning Committee, at a public meeting.

21. We would be grateful if you could include all the new & additional matters & material raised in this email & attachment in the submission to the Members Briefing Panel. We note that the Camden website states that the role of the Members Briefing Panel is not to decide upon applications but to consider the nature and extent of the outstanding objections to the application.

Kind regards & thanks

Professor M Francesca Cordeiro, Chair
John Beighton
Michael Webber
Chester Terrace Residents Association

p.s. we find it understandably puzzling that Tree numbers 214, 221, 488, 492 and 493 are scheduled for both pruning and removal... Planning Application Reference 2023/4229/T refers...

Below is an extract from a copy of the Planning Officer's email of May 16th 2023, which explicitly states the parameters set down by Camden regarding the Replacement Tree Planting

1. **The proposed planting consists of fewer trees than existing, many of which are of a smaller ultimate size than the existing tree stock.**
2. **This is not acceptable and the proposed planting should include the same number of replacement trees as existing, in the same locations**

as existing as much as possible, and with trees of a similar height to the existing.

3. The proposed replacement planting scheme will therefore need to be amended – amendments can either be made prior to determination or by condition.

October 30th 2023 report from SJ Stephens Associates

The Revised Strategy compares the ultimate sizes of trees to be removed with those to be planted.

I could not find any reference to the source of the ultimate height assumptions.

Some look suspect eg *Prunus avium* 'Stella' is listed as a "Medium tree" with a height of 8-12m, whereas the RHS website states the ultimate height is 2.5-4m.

The Revised Strategy lists "Large" trees as "12+m". I do not consider a 12-13m tree as large.

I have therefore compared the ultimate height of trees proposed for removal, taken from the TMA Arboricultural Report, dated Nov 2022, and those included in the Revised Tree Replacement Strategy, in the schedule attached.

This takes ultimate heights listed in Cassell's Trees of Britain and Northern Europe, apart from where the variety is not listed where the RHS website has been used.

Instead of just having a "12+m" category, I have refined this to include "13-18m" and ">18m" categories. This shows:-

Ultimate Size Proposed for Removal Proposed Replacements

4-7 m	0	4
8-12m	6	9
13-18m.	6	2
>18m.	8	5
Total.	20	20

This clearly shows a proposed shift away from large canopy trees.

It is well established that the really valuable trees, for example, for mitigating climate change, flood risk or air pollution are large canopy trees.

I have also reviewed the CAVAT assessment produced by TMA dated October 2023.

This values the trees to be removed at £1.2m and the anticipated value of newly planted trees after 40 years to be £1.16m.

The conclusion is that the new trees will mitigate those to be removed after 40-45 years.

I have a number of comments on this:-

- The calculations of future CAVAT value are suspect. The majority of trees are assumed to put on 1cm stem diameter each year. So, for example, the crab apple T11, Malus Evereste, after 40 years is assumed to have a stem diameter of 44cm which generates a value of £49,000. This is a short lived species with an ultimate height of only 8m. If it were to survive for as long as 40 years, it would be unlikely to have a stem diameter of more than around 20cm. Assuming a stem diameter of 20cm rather than 44cm would reduce the valuation by around 80%.
- The valuation assumes no trees die over the 40 year period. The report states that, if trees die, they should be replaced with the same species at the initial planting size. Some trees will inevitably die but the reduction in value in “starting again” with new tree planting is not factored in.
- As discussed above, a move to smaller growing tree species is proposed which one would expect to result in a significant reduction in CAVAT valuation.
- To have a meaningful comparison of the value of trees to be removed with those that might be present in 40 years time, one needs to depreciate the future value over the period. Depending on the depreciation rate taken, this will result in a current devaluation of well over £1m.

My conclusion is that the Revised Tree Replacement Strategy shows a significant shift to smaller canopy species and cannot mitigate for trees proposed for removal, even after 40 years. In the meantime, the environmental impact will clearly be much greater.

With such a significant arboricultural impact, it is suggested that alternative engineering options should be considered for works to the Chester Terrace retaining wall and balustrade, working around trees, rather than removing any that get in the way.



SJ Stephens Associates

ARBORICULTURAL, LANDSCAPE & MANAGEMENT CONSULTANTS

Michael Webber
9 Chester Terrace
London
NW1 4ND

30th October 2023

Dear Michael,

Re: Chester Terrace Replacement Tree Planting Proposals

As requested, I have reviewed the Revised Tree Replacement Strategy included in the Chester Terrace Tree Replacement Proposal, dated 17-10-2023, produced by Todd Longstaffe-Gowan.

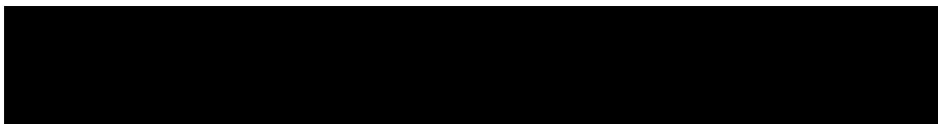
The Revised Strategy compares the ultimate sizes of trees to be removed with those to be planted. I could not find any reference to the source of the ultimate height assumptions. Some look suspect eg *Prunus avium* 'Stella' is listed as a "Medium tree" with a height of 8-12m, whereas the RHS website states the ultimate height is 2.5-4m. The Revised Strategy lists "Large" trees as "12+m". I do not consider a 12-13m tree as large.

I have therefore compared the ultimate height of trees proposed for removal, taken from the TMA Arboricultural Report, dated Nov 2022, and those included in the Revised Tree Replacement Strategy, in the schedule attached. This takes ultimate heights listed in Cassell's Trees of Britain and Northern Europe, apart from where the variety is not listed where the RHS website has been used. Instead of just having a "12+m" category, I have refined this to include "13-18m" and ">18m" categories. This shows:-

Ultimate Size	Proposed for Removal	Proposed Replacements
4-7m	0	4
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>18m	8	5
Total	20	20

This clearly shows a proposed shift away from large canopy trees. It is well established that the really valuable trees, for example, for mitigating climate change, flood risk or air pollution are large canopy trees.

I have also reviewed the CAVAT assessment produced by TMA dated October 2023. This values the trees to be removed at £1.2m and the anticipated value of newly planted trees after 40 years to be £1.16m. The conclusion is that the new trees will mitigate those to be removed after 40-45 years.





SJ Stephens Associates

ARBORICULTURAL, LANDSCAPE & MANAGEMENT CONSULTANTS

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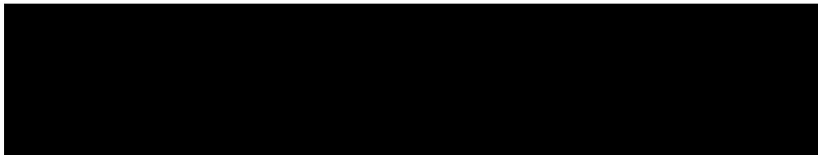
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- The valuation assumes no trees die over the 40 year period. The report states that, if trees die, they should be replaced with the same species at the initial planting size. Some trees will inevitably die but the reduction in value in "starting again" with new tree planting is not factored in.
- As discussed above, a move to smaller growing tree species is proposed which one would expect to result in a significant reduction in CAVAT valuation.
- To have a meaningful comparison of the value of trees to be removed with those that might be present in 40 years time, one needs to depreciate the future value over the period. Depending on the depreciation rate taken, this will result in a current devaluation of well over £1m.

My conclusion is that the Revised Tree Replacement Strategy shows a significant shift to smaller canopy species and cannot mitigate for trees proposed for removal, even after 40 years. In the meantime, the environmental impact will clearly be much greater.

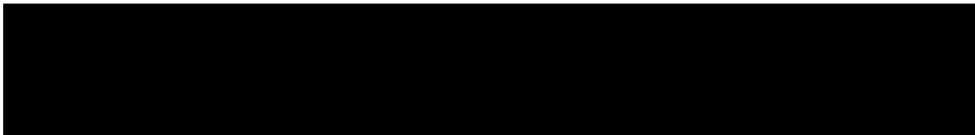
With such a significant arboricultural impact, it is suggested that alternative engineering options should be considered for works to the Chester Terrace retaining wall and balustrade, working around trees, rather than removing any that get in the way.

If you require any further information, please get in touch.

Yours sincerely,



Simon Stephens
MA Oxon, Dip Arb(RFS), MArborA, CEnv, MICF
Arboricultural Association Registered Consultant



Chester Terrace - Comparison of ultimate size of trees proposed for removal with those proposed for planting									
Proposed Tree Removal		Present Height	Age	Ultimate height (m)	Ref.	4-7m	8-12m	13-18m	>18m
T210	Sweet chestnut	16.5	Mature	30	Cassell's				1
T214	Aesculus flava	16	Mature	16	Cassell's			1	
T217	Chinese privet	9	Late mature	10	Cassell's		1		
T218	Sycamore	16	Mature	35	Cassell's				1
T221	Norway maple	14	Mature	25	Cassell's				1
T223	Sycamore	13	Mature	35	Cassell's				1
T227	Golden ash	12	Early mature	30	Cassell's				1
T229	Holly	6	Mature	15	Cassell's			1	
T486	Japanese cherry <i>Cerasus serrulata</i>	4	Mature	14	Cassell's			1	
T487	Purple plum	7	Late mature	8	Cassell's		1		
T488	Lime	18.5	Mature	24	Cassell's				1
T489	Wild cherry	10	Mature	25	Cassell's				1
T490	Purple plum	8	Late mature	8	Cassell's		1		
T491	Chinese privet	12	Late mature	10	Cassell's		1		
T492	Holly	8	Early mature	15	Cassell's			1	
T493	Cherry	8.5	Mature	25	Cassell's				1
T494	Holly	5	Mature	15	Cassell's			1	
T495	Box	6	Mature	8	Cassell's		1		
T496	Holly	6	Mature	15	Cassell's			1	
T731	Judas tree	5	Semi mature	10	Cassell's		1		
					Total	0	6	6	8
Proposed Tree Planting		Stated Size Class							
1	Lime	Large >12m		24	Cassell's				1
2	Birch	Large >12m		25	Cassell's				1
3	Judas tree	Small, 4-7m		10	Cassell's		1		
4	Cherry, <i>Prunus avium Plena</i>	Medium, 8-12m		12	RHS		1		
5	Holly	Medium, 8-12m		15	Cassell's			1	
6	Judas tree	Small, 4-7m		10	Cassell's		1		
7	Strawberry tree	Small, 4-7m		10	Cassell's		1		
8	Rhus	Small, 4-7m		8	RHS		1		
9	Cherry, <i>Prunus avium Stella</i>	Medium, 8-12m		4	RHS	1			
10	Strawberry tree	Small, 4-7m		10	Cassell's		1		
11	Cherry, <i>Prunus avium Stella</i>	Medium, 8-12m		4	Cassell's	1			
12	Crab apple, <i>Malus Evereste</i>	Small, 4-7m		8	RHS		1		
13	Chinese privet	Small, 4-7m		10	Cassell's		1		
14	Cherry, <i>Prunus avium Plena</i>	Medium, 8-12m		12	RHS		1		
15	Laurel	Medium, 8-12m		4	Cassell's	1			
16	Lime	Large >12m		24	Cassell's				1
17	Robinia	Medium, 8-12m		25	Cassell's				1
18	Osmanthus	Small, 4-7m		4	RHS	1			
19	Lime	Large >12m		24	Cassell's				1
20	Indian bean tree	Medium, 8-12m		15	Cassell's			1	
						4	9	2	5
Notes:									
1. Proposed Tree Removals taken from TMA Arboricultural Report, dated Nov 2022.									
2. Proposed Tree Planting taken from Revised Tree replacement Strategy 17-10-2023.									
3. Ultimate heights are taken from Cassell's Trees of Britain & Northern Europe, except where not listed, in which case taken from Royal Horticultural Society website.									