

From: Ben Lucas-Lee
Sent: 18 November 2023 12:00
To: Planning
Subject: 22B Harley Road London NW3 3BN (2023/4309/T)

Dear Planning Team

I'm writing to register my objection to the planning permission (2023/4309/T) - removal of the Tree of Heaven "T1". There are 3 pillars to the objection:

1. Removal of the tree would create instability in clay substructure on which the surrounding properties sit.
 - The tree's subsystem for part of a settled ground system on which the surrounding residential properties (14, 16, 18, 20, 22, 24 Harley Road, NW3) rely for structural support. The main structure of 22 Harley Road and the surrounding properties are more than 100 years old. These main structures show signs of their age, however, have not subsided.
 - Removal of the Tree of Heaven "T1" risks upsetting this settled ground system. This could occur through unpredictable heave (where water previously removed from the soil now remains and causes the ground to swell) or unpredictable collapse (where the density of the soil provided by the tree root system no longer exists).
 - Unsettling the ground system puts the surrounding 100-year-old structures, key to the heritage of the Elsworthy conservation area, at unnecessary risk.

2. The tree provides amenity to the surrounding properties and has a positive impact on the Elsworthy conservation area.
 - In section 3.27 of the Elsworthy conservation area appraisal and strategy document (July 2009), 'planting in public and private open space' is noted as a defining characteristic of the conservation area. The strategy for the

area states that "Loss of trees either within property boundaries or..." could "impact on the character of the area". Within this local strategy, and the wider London environmental context, it is clear that trees should only be felled if absolutely necessary.

- In summer, the tree in question provides important amenity to the surrounding residential property. The shade cast by the tree is important for reducing the impact of temperature and ultra-violet fluctuations on the characteristic woodwork (timber sash windows and doors) of the properties. Removal of the tree would require more frequent replacement of these features, also key to the quality of the conservation area, for some residents.
- The Tree of Heaven "T1" and surrounding trees and planting provide an important wildlife corridor in the urban environment. Bird species, not often seen in the centre of London such as Eurasian Jay, Greater Spotted Woodpecker, and Green Woodpecker have all been spotted in the last 12 months utilising this corridor.
- In the event that the tree is felled, there is no indication in the planning application that the tree would be replaced with one that provides similar amenity – this should be a requirement.

3. Alternative remedies exist that do not require removal of the tree.

- Given the lack of subsidence to any of the surrounding older structures, including the main 100-year-old structure at 22 Harley Road, it is highly likely that the movement in the conservatory and bay window is due to these additions not having adequate foundations for the soil structure on which they have been built.
- Rebuilding the foundations of the window and conservatory is highly likely to be required, even if the tree was removed. If adequate foundations / underpinning was in place for the soil, as is clearly the case for the main building due to a lack of subsidence, then the issue would be resolved. Removal of the tree is not necessary to undertake this work.
- Regular pollarding is noted as an option for managing the amount of the water the tree removes from the soil. A

suitable frequency of pollarding would be much less likely to unsettle the ground system on which the surrounding 100 year old structures rely.

I hope that the planning office will consider the reasons above for preserving the tree. Before permission is granted, the alternative remedies should be fully explored.

Yours sincerely,
Ben Lucas-Lee

Ben Lucas-Lee

18 Harley Road

NW33BN