



ARBORICULTURAL PLANNING CONSULTANTS

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The Director of Planning
London Borough of Camden
Camden Town Hall
Judd Street
London WC1H 9JE

29 January 2024



Dear Sir

**TOWN & COUNTRY PLANNING ACT 1990, SECTION 211
TOWN & COUNTRY PLANNING (TREES) REGULATIONS 1999
TREES IN CONSERVATION AREAS
TREES AT ST PANCRAS CHURCH, EUSTON ROAD, NW1 2BA**

NOTICE OF INTENTION TO UNDERTAKE THE PRUNING OF TREES

I write to inform you of my client's intention to prune ten individual trees (nos. 3-12 as shown on the attached Tree Works Plan *SJA TWP 22237-061b*) at St Pancras Church, Euston Road, NW1 2BA. The trees are not covered by a Tree Preservation Order but they are within the Bloomsbury Conservation Area.

The trees (nos. 3-12) do not appear to have been pruned for a significant number of years, an observation confirmed by the planning section of the LPA website which does not appear to list any applications for pruning works.

Consequently, the trees in question have since developed multiple over-extended limbs which overhang the surrounding roads, namely Upper Woburn Place and Duke's Road. Trees nos. 2 and 3 also overhang the adjacent properties to the south these being Central House and nos. 2 /4 Duke's Road, respectively; whilst trees nos. 1, 2, 10, 11, and 12 all overhang the adjacent church.

The precise details of the proposed pruning for trees nos. 3-12 can be found in the attached schedule of tree works document (*SJA stw 22237-01b*).

(Please note that London plane trees nos. 1 and 2 to the west of the Church are covered by a tree preservation order (TPO C1075 2013, T1 & T2 respectively) and as such, the proposed pruning to the crowns of both trees are addressed in a separate r16 application submitted online on the 29th of January 2024.)

We trust this information is sufficient for your purposes; but please do not hesitate to contact me if there is any further information you require.

Yours faithfully

A solid black rectangular box used to redact the signature of Simon Jones Associates.

SIMON JONES ASSOCIATES

Attachments:

1. Schedule of tree works (SJA stw 22237-01b)
2. Tree works plan (SJA TWP 22237-061b)

APPENDIX 1
Schedule of Tree Works



Schedule of Tree Works

at:

St Pancras Church, Euston Road



January 2024

Schedule of Tree Works

St Pancras Church, Euston Road - Trees growing within Bloomsbury Conservation Area

No.	Species	Recommended works
3	London plane	<p>North-east side: reduce heavy limb to NE, which originates at c. 3m from ground level and overhangs Duke's Road, to 11m from centre of trunk</p> <p>East side: reduce crown to 12m from trunk.</p> <p>South-east side: reduce heavy limb to SE, which originates at c. 8m from ground level and overhangs Duke's Road to 10m from centre of trunk</p> <p>South side: reduce large limb that originates at c. 9m back to 6m from centre of trunk and remove two small limbs that originate at c. 11m and 12m to significantly reduce the overhang of adjacent dwelling (No. 2 Duke's Road); reduce or remove any smaller branches to ensure no part of the crown is within 2.5m of the roof or the north flank wall of No. 2.</p> <p>West side: reduce crown back to 8.5m from the centre of the trunk.</p> <p>Throughout crown: remove any deadwood of 50mm diameter or greater at point of origin.</p>
4	Lime	<p>Crown lift to 3m above ground level on the west side; and to 5.5m on the east side above Duke's Road.</p> <p>Branch to NW, formed of two small stems growing from the northern of the two main stems of the tree: lightly reduce the more northerly of these two small stems to reduce weight and crown spread to the NW to 6.5m from the centre of the trunk.</p> <p>Remove any broken hanging branches, branch stubs and any deadwood of 50mm diameter or greater at point of origin.</p>
5	Lime	<p>Crown lift to 3m above ground level on the west side; and to 5.5m on the east side above Duke's Road.</p> <p>Remove all basal suckers and epicormic growth on trunks to 8m above ground to provide a view of the church from Duke's Road.</p> <p>Remove any broken hanging branches and any deadwood of 50mm diameter or greater at point of origin.</p>
6	Lime	<p>Crown lift to 3m above ground level on the west side; and to 5.5m on the east side above Duke's Road.</p> <p>Remove all basal suckers and epicormic growth on trunks to 8m above ground to provide a view of the church from Duke's Road.</p> <p>Remove any broken hanging branches and any deadwood of 50mm diameter or greater at point of origin.</p>
7	Lime	<p>Crown lift to 3m above ground level on the west side; and to 5.5m on the east side above Duke's Road.</p> <p>Remove all basal suckers and epicormic growth on trunks to 8m above ground to provide a view of the church from Duke's Road.</p> <p>Truncated branch to west that originates at 4.5m: thin out the 6-8 stems at the previous reduction point to leave only three.</p> <p>Remove any broken hanging branches and any deadwood of 50mm diameter or greater at point of origin.</p>

8	Lime	Crown lift to 3m above ground level on the west side; and to 5.5m on the east side above Duke's Road. Reduce over-extended large branch to SW that originates at 6m by removing 4.5m long section of leader back to side branch and thereby reducing crown spread to SW to 6m from trunk. Remove broken hanging branch and any deadwood of 50mm diameter or greater at point of origin.
9	London plane	Crown lift branches that overhang the church garden to minimum 3m above ground level.
10	London plane	Crown lift to 3.5m above ground level in church garden. Reduce overhanging canopy back to 2.5m from site boundary.
11	London plane	Crown lift to 3.5m above ground level in church garden. Reduce overhanging canopy back to 2.5m from site boundary.
12	London plane	Crown lift to 3.5m above ground level in church garden. Reduce overhanging canopy back to 2.5m from site boundary.

All tree works are to be done in accordance with the British Standard BS 3998: 2010, *Tree work - Recommendations*. Climbing irons or spikes are not to be used whilst pruning trees; they may only be used for the sectional removal of trees.

All arisings are to be removed from site, which is to be left neat and tidy as found.

Birds. Please note that it is an offence under Wildlife and Countryside Act (WCA) of 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000, to:

- Kill, injure or take any wild birds
- Damage or destroy nests that are in use or are being built
- Take or destroy eggs

Intentionally or recklessly disturb any wild bird while it is nest building, or at (or near) a nest containing eggs or young or disturb the dependent young of any bird.

Care must therefore be taken that none of these offences are committed whilst undertaking the above works. If trees or hedges are to be felled or pruned between March and August, they should first be inspected carefully for nests; if found, and the proposed works are not necessary to preserve public health or safety, felling or pruning should be delayed until young birds have flown.

Bats. All bats are legally protected by the WCA and CROW Act. Further protection is conferred by the Conservation of Habitats and Species Regulations 2010, following the European Habitats Directive (1992). These Acts and Regulations include provisions making it illegal to:

- Recklessly or deliberately kill, injure or capture (take) bats
- Recklessly or deliberately disturb bats (whether in a roost or not)
- Damage, destroy or obstruct access to bat roosts (whether in use or not)

Prior to undertaking any tree works, a scoping survey comprising a detailed visual inspection from ground level for any evidence of bat occupancy should be made by an appropriately qualified person, or if necessary, by a suitably qualified ecologist. Where features that have the potential to be a bat roost have been observed, a secondary bat assessment comprising a close-up aerial examination should be undertaken immediately prior to the commencement of tree works. If following the secondary assessment, it is reasonably suspected that a roost exists, a licensed bat worker should be contacted to undertake a more detailed assessment with specialist equipment. Should a tree be found to be supporting a bat roost, a licence will be required from the relevant Statutory Nature Conservation Organisation (SNCO), before any works can be carried out.

If emergency work is required to a tree on the grounds of public safety, that specimen must still be assessed for bats prior to work commencing; and if it is suspected that the tree supports a roost the relevant SNCO, local police liaison officer and a licensed bat worker must be informed. If the condition of the tree poses an imminent danger to the public then public safety will take precedence. However, the contractor must ensure that no reasonable alternatives are available, and that he undertakes only the minimum action that can be safely taken to reduce the risk to the public to an acceptable level. Furthermore, he should record the tree's condition and justification for the work in writing.

Where tree surgery is carried out, cuts will be made as far above any likely hole or crack in the bark which has potential to support a roosting bat, and crown thinning or reduction will be minimised. If, following secondary assessment no roosts are identified or reasonably suspected, but the potential for them still exists, work should proceed with caution. For example, stems and/or branches should be lowered carefully by rope and where possible large sections will be left on-site for a minimum of 48 hours to allow bats to vacate. Note that if a bat roost is damaged during tree works it may be necessary to demonstrate to the SNCO that good practice was implemented.

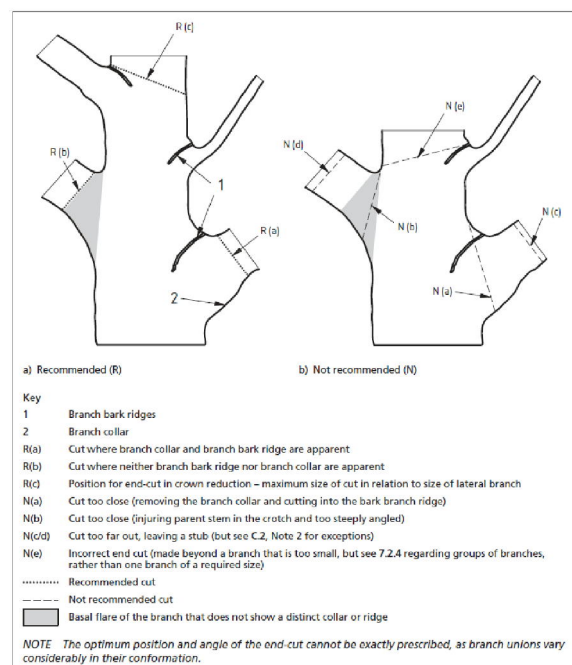
If bats are discovered when limbs are removed or trees are felled, work must stop immediately and the relevant SNCO, the local police liaison officer and if possible, a licensed bat worker must be informed.

Definition of Terms

1. Pruning (in general)

1.1. Pruning shall be undertaken following the principles of good arboricultural practice as stated in British Standard BS 3998: 2010. The positions of final pruning cuts will comply with Figure 2 'Positions of final cuts' at p23 of this document, as shown below.

1.2. Where aerial growth is to be removed, great care shall be taken not to leave a stub which may provide a food base for both fresh wound parasites and decay fungi and not to cut back into or beyond the branch collar. Injury of the wood and bark of the parent stem or branch above the cut will also be avoided.



2. Dead-wooding

2.1. Dead-wooding is the removal of all dead, dying or diseased branch wood, broken branches and stubs left from previous tree surgery operations that are 50mm in diameter or above at their point of origin.

2.2. When removing dead or diseased branches care will be taken to avoid injury to living bark or sapwood, which could lead to the development of further dysfunction and colonization by decay fungi or pathogens.

3. Selective pruning

3.1. Selective pruning is defined as the removal or shortening of individual branches for a specific reason.

3.2. This can be to remove or reduce specific branches which whilst they are not dead are at risk of failure (torn or split branches, branches that protrude from the crown, have excessive end weight, or are 'hazard beams'); or to clear branches that are interfering with buildings, landscape features or other structures, or with the efficient and safe use of infrastructure (e.g. utilities, street furniture and transport routes).

3.3. Where such work is specified the amount of material to be removed and the diameter(s) of the pruning cut(s) should be the minimum required for the purpose.

4. Crown lifting

4.1. Crown lifting is defined as the removal of all soft growth and branches or parts thereof within the limits prescribed by the Schedule of Works, which are below or which extend below the height specified therein.

4.2. Ascending branches that originate below the specified height, and have no foliage below this point, shall be retained unless otherwise specified. Descending branches that originate above the specified height, and have foliage below this point, shall be reduced back to the closest appropriate junction point to the desired height.

4.3. Crown lifting may result in the canopy base being not at one single level but stepped to allow for different clearances, for example where a tree overhangs both a footway and a carriageway (which have different clearance requirements).

5. Crown reduction

5.1. Crown reduction is defined as the reduction of the outline dimension of the canopy, from the tips of limbs and branches toward the main trunk, by pruning growth to an appropriately sized lateral branch, twig or bud to leave a flowing silhouette.

5.2. The crown should normally be reduced in proportion to its original shape, to avoid altering the form of the tree, and to maintain as natural an appearance (for the species) as constraints allow. A strong framework of healthy small-diameter branches and twigs (leaf-

bearing structure), capable of producing dense leaf cover during the following growing season, should be retained.

5.3. Reduction may be of the entire crown, or of one part of the crown. The extent of reduction is given in metres.

5.4. Where a limb, branch or leader is to be shortened it shall be cut back cleanly to a vigorous side branch leaving the branch bark ridge and branch collar intact. **The diameter at point of origin of retained side branches intended to form the new dominant shoot shall be at least 30% of the diameter of the parent branch at the pruning point.** Wounds should not exceed 100 mm in diameter except on very large trees.

5.5. The number and size of pruning cuts should be limited so that their total cross-sectional area does not exceed one-third of that of the trunk, when measured at 1.5 m above ground level.

6. Removal of arisings

6.1. The working area is to be left clean and tidy when the contractor goes off site at the end of the working day. The Contractor shall keep all highways, drives and footpaths clear of obstructions.

6.2. The Contractor shall be responsible for the disposal of all arisings from the works at his own expense. All charges, fees, transport and other expenses arising from tipping shall be borne by the contractor.

6.3. The Contractor shall remove arisings from site as soon as is reasonably practicable after they are produced. Removal of arisings shall not be undertaken on Saturdays, Sundays or Public Holidays without the prior written agreement of the client.

6.4. The Contractor shall be responsible for the provision of an authorised tipping facility, and for ensuring that all arisings from the works are removed thereto. Such a facility shall be off-site, and no unauthorised tipping shall be carried out within the contract area or in any other place.

7. Working alongside the public highway

7.1. The Contractor shall be responsible for ascertaining and complying with the requirements of the highway authority and the police as to any regulations, restrictions, directions or instructions concerned with the movement of traffic or pedestrians close to the works.

7.2. The Contractor shall warn the public of works alongside the highway by the display of appropriate warning signs, in accordance with current Department of Transport requirements.

APPENDIX 2
Tree Works Plan

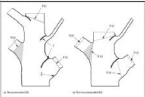
Pruning

Pruning

Where aerial growth is to be removed, great care shall be taken not to leave a stub which may provide a food base for both fresh wound parasites and decay fungi.

Where a limb, branch or leader is to be shortened it shall be cut back, clearly to a vigorous side branch leaving the branch bark ridge and branch collar intact. Retained side branches intended to form the new dominant shoot shall be at least 96% of the diameter of the parent branch at the pruning point. Injury of the wood and bark of

The contractor shall relate the position of any individual tree pruning cut to the form of the canopy as a whole, so that upon completion of the work the tree has an natural an appearance (for the species) as constraints allow.



Crown Lifting

Crown Lifting

Crown lifting is defined as the removal of all soft growth and branches or parts thereof within the limits prescribed by the Schedule of Work, which are below or which extend below the height specified therein.

Ascending branches that originate below the specified height, and have no foliage below this point, shall be retained unless otherwise specified. Descending branches that originate above the specified height, and have foliage below this point, shall be reduced back to the closest appropriate juncture point to the desired height.

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Crown Reduction

Crown reduction is defined as the reduction of the outline dimension of the canopy, from the tips of limbs and branches toward the main trunk, by pruning growth to an appropriately sized lateral branch, twig or bud to leave a flowing silhouette.

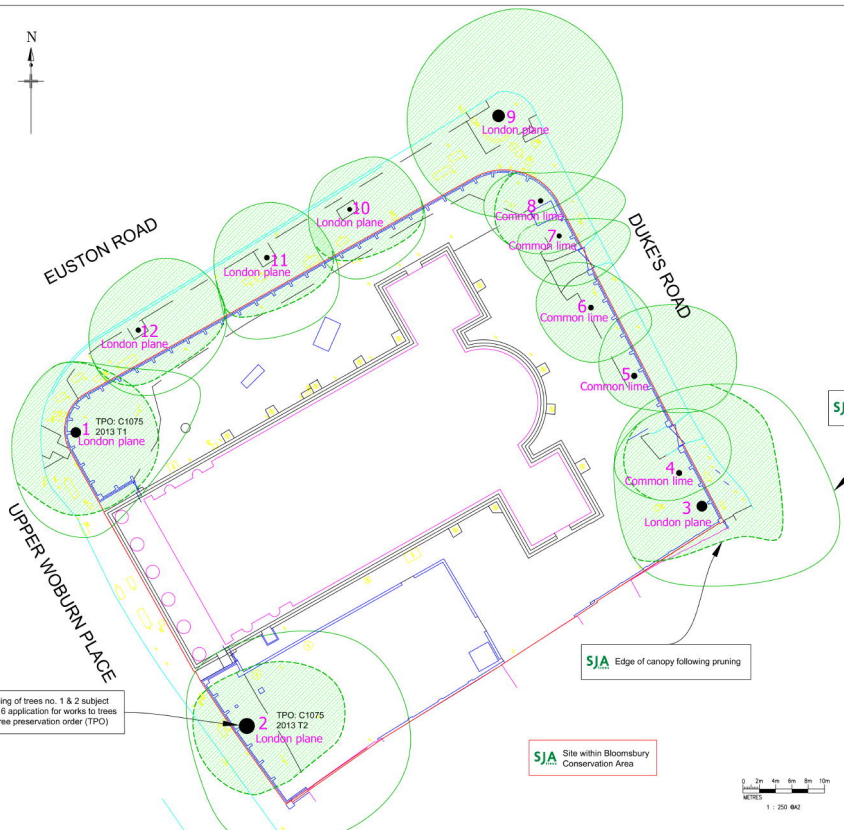
Reduction may be of the entire crown, or of one part of the crown. The

Dead-Wooding

Dead-Wooding

Dead-wooding is the removal of all dead, dying or diseased branch wood, broken branches and stubs left from previous tree surgery operations that are 25mm in diameter or above at their point of origin.

When removing dead or diseased branches care will be taken to avoid injury to living bark or sapwood, which could lead to the development of further decay, infection and/or colonization by fungi, bacteria or pathogens.

[illegible]

Edge of canopy at present

 ASSOCIATIONAL PLANNING CONSULTANTS		
Project:	St. Patrick's Church	
Client:	PCD of London St. Patrick's	
Drawing:	THREE WORKING PLANS	
Drawing to:	SJA TRIP 22222-06 to (3211) modification	
Based on:	Topographical survey	
Drawn by: (initials)	Date of Issue: June 2004	Scale: 1:250 @ A2
Checked by: (initials)	Tel 01757 731059 E aj@sjaplanning.co.uk	
Tree symbol	Conservation symbol	Archaeology symbol

For further information see the **Conservation Tree Symbolisation** Schedule.
 On the scale from the drawing, please check all dimensions on site, and notify us of any discrepancies. Dimensions are for information only. Dimensions are not to be relied upon for the purpose of the topographical survey or for any other purpose. We cannot be held responsible for the accuracy of the topographical survey or for any other purpose. We cannot be held responsible for the accuracy of the topographical survey or for any other purpose. We cannot be held responsible for the accuracy of the topographical survey or for any other purpose.

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