

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Mr Hodgson

1. We have now received the report from Simon Stephens, MA Oxon, Dip Arb(RFS), MArborA, CEnv, MICF Arboricultural Association Registered Consultant re the revised Tree Replacement Proposal, dated 10-04-2024, produced by Todd Longstaffe-Gowan in respect of the Camden Planning Application Reference 2023/0282/P.
2. The revised proposals have been reviewed in the light of the Camden Planning Officer's email to the CEPC, dated May 16th 2023, which states that an acceptable tree replacement scheme must **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. As will be seen from the comments below the CEPC has again ignored the clear, unambiguous criteria & parameters set out by Camden.
4. In brief 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, which they are planning to unnecessarily destroy & cut down.
5. The three core conclusions from the SJ Stephens report are :-
 - **The immediate, negative impact will be to replace, fine mature tree specimens with young saplings.**
 - **The negative impact on Chester Terrace Gardens will be radical & the gardens will never recover because of the proposed replanting locations.**
 - **The CEPC is not planning to plant the large replacement trees in the same locations. The existing trees are fairly evenly spread along the garden length whereas the revised CEPC proposal is to keep all the larger trees to the far north & south edges of the gardens.**

6. It should be noted by Camden that the CEPC are trying to use the repairs to the balustrade & wall as a Trojan Horse in order to implement a fundamentally flawed proposal by Longstaffe-Gowan. Longstaffe-Gowan's proposal was to try & return Chester Terrace Gardens to what they, erroneously, claimed they were like in the 1820s (when there were only horse drawn carriages & no motor vehicles etc). We & many others consider this to be a reckless & inappropriate objective that it is not relevant nor appropriate to life in London & Regent's Park, some 200+ years later.
7. It was further noted that there has been no disclosure as to the source of the ultimate height assumptions in the revised CEPC proposals & that some of the quoted heights look suspect e.g. *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.
8. Understandably the Chester Terrace Residents Association is extremely unhappy at the further efforts by the CEPC to ignore & disregard the principles clearly set out in Camden's email of May 16th 2023 & their determination to short change the public & residents.
9. The CEPC are ignoring the reasonable rights of the general public & the reasonable rights of residents.
10. It is clear that the amenity value of the existing trees in Chester Terrace Gardens is substantial, which are seen & enjoyed by the general public.
11. The trees in Chester Terrace Gardens 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.
12. These trees also have significance in their surroundings and have a positive & wider impact on the environment.
13. In brief, the evidence shows that the proposed replanting strategy clearly does not offer the same level of visual amenity, air quality, biodiversity, health and well-being for the public.
14. We look forward to hearing from Camden after you have had an opportunity of considering the contents of this email.
15. Meantime we will be shortly submitting expert, independent evidence to Camden regarding the unnecessary use of a 21T excavator, which is intended to be the catalyst in order to destroy the 20 mature trees & many mature shrubs in Chester Terrace Gardens.

Kind regards

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

1. Mr Stephens compared the trees proposed for removal, taken from the TMA Arboricultural Report, dated Nov 2022 (see plan below) and those included in the latest Tree Replacement Proposals, taken from Todd Longstaffe-Gowan Tree Replacement Proposal rev A (see Revised Tree Replacement Strategy 2024 plan).
2. The Revised Strategy compares the ultimate sizes of trees to be removed with those to be planted.
3. There was no reference to the source of the ultimate height assumptions.
4. Some look suspect e.g. *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.
5. The Revised Strategy lists "Large" trees as "12+m". Mr Stephens reasonably does not consider a 12 - 13m tree as large.
6. Mr Stephens prepared the schedule below which takes ultimate heights from 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, he has refined this to include "13 - 18m" and ">18m" categories.

This shows:-

Ultimate Size	Proposed for Removal	Proposed Replacements
4 - 7m Small	0	4
8 - 12m Medium	6	8
13 - 18m Large	6	2
>18m Very Large	8	8
Total	20	22

Although the same number of very large growing trees (with an ultimate size of >18m) are being planted as will be removed, there has been a shift away from large growing trees (with an ultimate size of 13 - 18m) to medium and small growing trees.

The three criteria set out by Camden in their May 16th email to the CEPC were:-

a) The same number of replacement trees - 22 replacements are proposed to replace 20 trees for removal.

b) To be planted, as far as possible, in the same locations - 'This is clearly not the intention of the CEPC nor the result. **Whereas the existing trees to be removed are fairly evenly spread along the frontage, providing benefits to all the Chester Terrace residents (shaded grey on plan attached), the replacement strategy keeps all the larger trees to the edges.**

c) To be of similar size - Although the 8 very large (>18m) growing trees have been replaced with the same number, the number of large trees (13 -18m) has been reduced from 6 to 2, in favour of smaller growing trees.

1. **It must be stressed that these size comparisons are all based on maturity i.e. after at least 40 years.**
2. **The initial impact will be replacing fine mature specimens with young saplings.**
3. **The impact on Chester Terrace will be radical and take decades to begin to heal.**

Mr Stephens states that with such a significant negative & damaging arboricultural impact, as a result of the tree replanting proposals, it is critical that any alternative engineering options are considered for the works to the Chester Terrace retaining wall and balustrade – possibly a piled solution - that could work around trees, rather than removing any that get in the way.

Chester Terrace

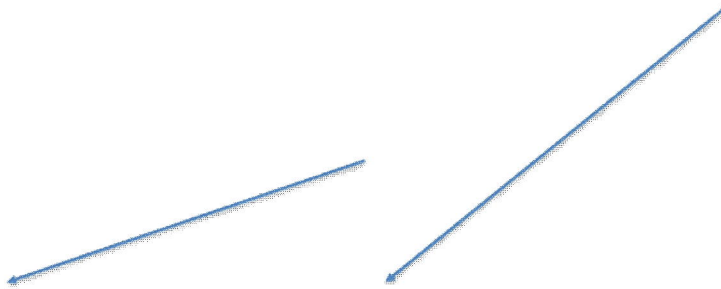
Chester Terrace - Comparison of ultimate size of trees proposed for removal with those proposed for planting									
Proposed Tree Removal		Present Height	Age	Ultimate height (m)	Ref.	4-7m	8-12m	13-18m	>18m
T210	Sweet chestnut	16.5	Mature	30	Cassell's				1
T214	Aesculus flava	16	Mature	16	Cassell's			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 pendula 'Laciniata'	Large >12m		25	Cassell's				1
3	Judas tree 'Bodnant'	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 <i>Arbutus unedo f. rubra</i>	Small, 4-7m		8	RHS		1		
8	Rhus, <i>Rhus typhina 'Dissecta'</i>	Small, 4-7m		4	Cassell's	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	River birch, <i>Betula</i>	Large >12m		24	Cassell's				1

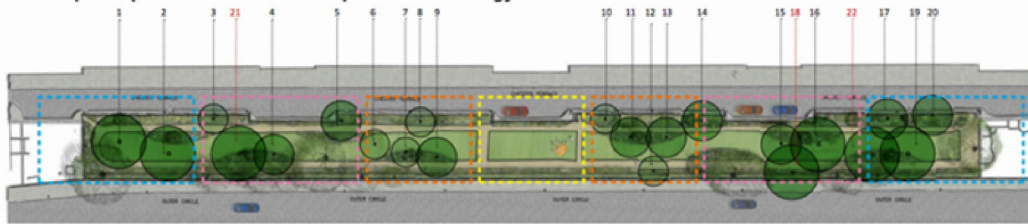
	<i>nigra</i>						
19	Lime, <i>Tilia cordata</i>	Large >12m	24	Cassell's			1
20	Indian bean tree	Medium, 8-12m	15	Cassell's		1	
21	Lime, <i>Tilia × europaea</i>	Large >12m	40	Cassell's			1
22	Lime, <i>Tilia × europaea</i>	Large >12m	40	Cassell's			1
					4	8	2
Notes:							
1. Proposed Tree Removals taken from TMA Arboricultural Report, dated Nov 2022.							
2. Proposed Tree Planting taken from Todd Longstaffe-Gowan Tree Replacement Proposal revA, dated 10th April 2024							
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.							



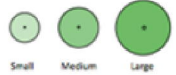
From TMA report dated Nov 22 - trees for removal shaded grey



Landscape Proposals - Revised Tree Replacement Strategy 2024



Legend



Strategic Zones:



Small 4m to 7m
 Medium 8m to 12m
 Large 12+m

- | | |
|----------------------------------|--------------------------|
| 1. Tilia cordata | 12. Malus 'Evereste' |
| 2. Betula pendula 'Laciniata' | 13. Ligustrum lucidum |
| 3. Cercis siliquastrum 'Bodnani' | 14. Prunus avium 'Piena' |
| 4. Prunus avium 'Piena' | 15. Laurus nobilis |
| 5. Ilex aquifolium | 16. Tilia cordata |
| 6. Cercis siliquastrum | 17. Robinia pseudoacacia |
| 7. Arbutus unedo f. rubra | 18. Betula nigra |
| 8. Rhus typhina 'Dissecta' | 19. Tilia cordata |
| 9. Prunus avium 'Stella' | 20. Catalpa bignonioides |
| 10. Arbutus unedo | 21. Tilia x europaea |
| 11. Prunus avium 'Stella' | 22. Tilia x europaea |

Total number of trees to be removed		Total number of replacement trees	
Small	6	Small	6
Medium	6	Medium	9
Large	8	Large	7
Total	20	Total	22

N.B. Trees have been replaced in accordance with the following principles:

- Replacement tree size is determined by reference to the Tree Replacement Strategy following the Tree Planting Zone diagram. I.e. the tree size is capped to the zone size (a large tree in the "small to medium" zone has been replaced with a medium tree).
- As large as possible varieties have been placed per zone, and in one case, after careful consideration (and recognising concerns over the loss of canopy cover), a large tree (item 16. Tilia cordata) has been added in the "small to medium zone".
- Large trees cannot be placed on top of the foundations of the replacement wall due to the foundations.