

[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

Further to our email of May 14th we now wish to highlight & “consolidate” the many issues regarding the unacceptable problems arising from the latest CEPC’s tree replanting proposals, in order that a further, in depth, review can be undertaken by Camden.

1. Our email to Camden of February 8th 2024 confirmed that according to The Town and Country Planning (Tree Preservation)(England) Regulations 2012 the CEPC does not fall within any of the exempt definitions.
2. Our email to Camden of February 13th 2024 set out the comments from SJ Stephens, the CTRA’s expert Chartered Arboriculturist, regarding the importance of CAVAT valuations “to inform tree management decisions in relation to visual amenity”. The factual conclusion by Mr Stephens stated “As detailed in my letter of 30-10-2023, I believe the CEPC future estimation of CAVAT value has been over estimated and, since the proposal is a shift to smaller canopy trees, the new planting will never mitigate for the trees removed.”
3. The current tree replanting proposals from the CEPC do not adhere to the principles & policies as set out by Camden in their emails of May 16th 2023 & July 26th 2023 noted, respectively, below...
 - 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.
 - As previously highlighted, the proposal to implement a replanting strategy with fewer and smaller sized trees located at either end of Chester Terrace Gardens instead of in their current locations is not accepted...Policy A3 of the Camden Local Plan highlights that

where the loss of trees of value cannot be avoided, the Council will require suitable replacements capable of providing at least equal amenity and ecological value. The Area Manager for Chester Terrace and the Trees and Enforcement Manager agree with this position.

4. The main strategy adopted by the CEPC, throughout, has been to ignore Camden & to seek ways to try & circumvent the unambiguous principles & policies that have been communicated to it.
5. The CEPC has sought to pressurise Camden into accepting the fundamentally flawed proposals emanating from Longstaffe Gowan.
6. These proposed tree replanting objectives by the CEPC seek to open up views of Chester Terrace from within Regent's Park. This is practically impossible because of the extensive post-war tree planting within the park & the hedgerow abutting the Outer Circle, particularly relevant along the eastern perimeter of the park.
7. Meantime we understand that the Royal Parks has no plans to cut down all the trees in Regent's Park eastern perimeter & to remove the hedgerow.
8. The tree planting layout in Regent's Park has understandably evolved and changed considerably over last 200 years & the objective of the CEPC is therefore fundamentally flawed, as it ignores this reality.
9. Below is the misleading picture that the CEPC is using to support their fundamentally flawed case for their tree replanting proposals.



10. It can be readily appreciated, from viewing the above image, that the objective of Longstaffe Gowan is fictional because there is no horse riding & no horse drawn carriages existing in Regent's Park in 2024. Additionally, at the outset, it should be stated that there were no cars, no coaches, no lorries nor motor bikes in the 1820s ; second, Regent's Park, itself, has fundamentally altered & dramatically changed during the last 200 years ; third, the conditions in London in 2024 are fundamentally different + the socio-economic circumstances existing today, the way of life of its residents & their composition, differs significantly from 200 years ago...Also the following issues are now

of critical importance which did not exist as issues in the 1820s... ecology, biodiversity, air quality, climate change, water management, health and the well-being of the public.

11. Despite all of the evidence the CEPC continues with their fundamentally flawed efforts to secure the agreement of Camden to their latest tree replanting proposals. The latest changes that have been made are very minor & still do not address all the valid criticisms from Camden, from the Chester Terrace Residents Association & from the Regents Park Conservation Area Advisory Committee (their latest communication was on November 6th 2023).
12. Our most recent email to Camden of May 14th highlights, in more detail, the valid concerns particularly on the positioning of the tree replanting (cramming all the large trees into the extremities of the garden) & the size of the trees to be used, which will be saplings that will take circa 40 - 45 years to grow to the existing size of the trees in gardens today.
13. The Chester Terrace Residents Association has provided Camden with evidence from Simon Stephens, MA Oxon, Dip Arb(RFS), MArborA. CEnv, MICEF Arboricultural Association Registered Consultant regarding a number of issues concerning the CEPC tree replanting proposals. The latest misleading disclosure from the CEPC was highlighted in the email of May 14th in which it was noted that there had been no disclosure as to the source of the ultimate height assumptions used 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. It is therefore unclear what information, that is produced by the CEPC, can be relied upon ?
14. The February 9th 2024 email to the CEPC stated that Camden intended to recommend the refusal of the planning and listed building applications. This position had been reached because, following the review of the revised replacement planting scheme with tree and conservation officers, it was felt that the replacement planting scheme was not adequate and the new trees would not provide the same level of amenity, ecological and heritage value as the existing ones do. It further stated that as the existing trees are an important characteristic of the gardens, their loss and insufficient replacements are considered to be harmful to the conservation area and the setting of the listed building, and that Camden were unable to identify sufficient public benefits that would outweigh this harm.
15. Since receipt of this February 9th email we understand that the CEPC has been exerting considerable pressure on senior executives at Camden & that a site visit was arranged by Camden on March 12th...
16. Camden's own tree expert noted on February 21st that the 20 trees proposed for removal are highly visible from the public realm and significantly contribute to the verdant character and appearance of the conservation area. He made the following relevant further important comments...'The trees provide a high level of amenity to public. The loss of mature trees would cause harm to the setting of the listed building. As such, it is considered that the trees are considered to be suitable for protection via a tree preservation order. The trees help to mitigate the effects of climate change, the urban heat island effect and they provide habitat. It is well documented that larger canopied species outperform smaller canopied trees in terms of the ecological services they

provide. The trees perform a valuable function of combating poor air quality. The site fails to meet to the annual mean objective for NO₂ levels with 2016 figures which are the latest year for which figures are available. The application site is less than 80m from Albany Street and less than 470m from Marylebone Road, both of which have some of the highest levels of airborne particulate pollution in the borough and are neighbouring the densely populated Regent's Park Estate. The site is less than 80m from Christchurch Primary, a school on Albany Street. In accordance Local Plan policy A3. point J. the council will: resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation; While CEPC is a statutory body, the council does not consider CEPC to be a statutory undertaker. As such tree works in conservation areas undertaken by CEPC do not fall under the exemption for statutory undertakers of the s.211 notification process. The proposed replacement planting is forecast to achieve a similar CAVAT value to the existing planting in 40-45 years and demonstrates an overall shift toward smaller - canopied species, which is not welcomed. This calculation assumes that all planted trees will establish well, survive and reach their full potential which is considered unlikely given the challenges urban trees face. 40 to 45 years is considered too long to wait to mitigate the loss of trees removed to combat climate change and reduce air pollution. Local residents do not have 40 to 45 years to wait to combat climate change and reduce air pollution. There is significant public support for the retention of trees.

In brief, the Chester Terrace Residents Association are very concerned & disturbed at the current developments & hope that Camden will stand firm (& uphold the principles & views set out in their communications of May 16th & July 23rd, 2023 + those of February 9th & 21st 2024) & insist that the CEPC adhere to Camden's own principles & policies + take account of the contents of this email & the one of May 14th because of the positive benefits that the existing trees provide in terms of ecology, biodiversity, air quality, climate change, water management, health and the well-being of the public.

Kind regards

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

