Application No:	Consultees Name:	Received:	Comment:	Response:
2024/2301/T	Louisa Wade	19/06/2024 12:12:05	OBJ	Dear Planning Team, Application Ref: 2024/2301/T (30 Belsize Park – 1 x Ash (T1) – Fell and treat stump with eco-plugs) I am a resident of 30 Belsize Park and wish to object to the application to fell the Ash tree located in the rear garden of our property. I am a Flood Risk and Drainage Consultant by profession, and in my line of work I am aware of the vital role of trees in managing both flood risk and providing drainage solutions. The geology of the local area is London Clay which results in high levels of surface water runoff. The online Environment Agency mapping shows a moderate surface water flood risk around 30 Belsize Park but notably not in the rear garden. This is likely due to the presence of the vegetation, and the Ash in particular being a mature tree, which absorbs a lot of the water. The rear garden does become boggy in very wet weather, and it is highly likely that the removal of this well established tree will exacerbate the situation which could result in an increased surface water flood risk not only to the basement flats of 30 Belsize Park but also the neighbouring properties. The Ash provides a habitat for birds, insects and squirrels, as well as the visual and amenity benefits which are in keeping with the area and the Conservation status. National and local policy is to implement sustainable drainage systems, so working with nature and allowing trees to manage the surface water issues is preferable to engineered solutions to manage the future flood risk problems which will come with the onset of climate change. I note in the 'Statement of Reasons' the comment relating to the "Very likely infection in the foreseeable future by Ash dieback" which seems rather unjustified given the tree is currently a healthy mature specimen. I understand that a previous application relating to cracks in the extension of 63a Belsize Lane resulted in the removal of Poplars, trees and shrubs from the rear garden of 29 Belsize Park. Further information in the 'Engineering Appraisal Report' states that ground investigation in 2018 and 2023 deemed the foundations of the extension to be between 630mm and 750mm deep, and that laboratory analysis shows the clay to be of very high plasticity. With reference to The Building Regulations 2010 Part A 'Structure', Section 2E4 'Minimum depth of strip foundations' states: "In clay soils subject to volume change on drying ('shrinkable clays'), with Modified Plasticity Index greater than or equal to 10%), strip foundations should be taken to a depth where anticipated ground movements will not impair the stability of any part of the building taking due consideration of the influence of vegetation and trees on the ground. The depth to the underside of the foundations on clay soils should not be less than 0.75m on low shrinkage clay soils, 0.9m on medium shrinkage clay soils and 1.0m on high shrinkage clay soils, although these depths may need to be increased in order to transfer the loading onto satisfactory ground, or where there are trees nearby." Given the foundation depths on the extension are less than the minimum required by the Building Regs 2010 Part A, it would suggest that the main component of the damage caused to the extension is due to a poorly designed and constructed extension, rather than the influence of a nearby tree which pre-dates the extension by several decades. It also raises the question of why wasn't the extension piled, given the high potential of shrinkage of the underlying clay soils? The Council (and the Applicant) should also be aware that the removal of this tree may not solve the problem. In locations where the tree pre-dates the building, such as here, the excess water which the tree roots were

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previously taking up will cause the clay soils to swell, and this will also result in movement of the foundations resulting in cracks. This process is known as ‘heave’.

I note the ‘Engineering Appraisal Report’ refers to the damage numerous times as ‘minor internal cracking’ and ‘slight’. They refer to the level of damage being classed as ‘2’ on the BRE Digest 251 index, which is defined as “Noticeable cracks, yet easily filled 1.0mm – 5.0mm”. Does this slight cracking warrant the removal of a healthy mature tree with a TPO in a Conservation Area?

It seems that a number of trees in neighbouring gardens have already been removed at the request of the Applicant – how many more trees will need to be removed to facilitate this poorly constructed extension?

Kind regards

Louisa Wade