

**ARBORICULTURAL IMPACT ASSESSMENT
& METHOD STATEMENT
AT 41 HOLLYCROFT AVENUE
LONDON NW3 7QJ
MARCH 2025**



ARBORICULTURAL CONSULTANTS

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SUMMARY

This report has been commissioned to provide detail on potential impacts on the existing tree population by a proposed redevelopment at 41 Hollycroft Avenue, London NW3 7QG, and the protection measures required to ensure the long-term health of retained trees. The proposal is the demolition of the existing rear extension and construction of a new rear extension in its place. Other works are proposed within the footprint of the building that have no potential impacts on the vegetation.

Trees considered to be within the influencing distance of the development have been assessed in accordance with BS5837:2012 "Trees in relation to design, demolition and construction – Recommendations". I have inspected all the trees on and near the site that could potentially be affected by the development and list their details in Appendix A. As a result, 12 individual trees, 4 groups and 1 hedge were included. The implications of the proposal are:

1. The current proposed development does not require the removal of trees. Changes to the front elevation require the cutting back of one tree T11 (Wisteria) currently trained along the wall.
2. There is a very minor encroachment into the root protection area of one tree (T9), but it is considered unlikely to have any impact on the tree.
3. The development must be constructed using the methodology in this report to ensure the long-term health of the retained trees.

1. Introduction

1.1. Instructions

1.1.1. We are instructed by Dominic McKenzie Architects on behalf of the clients to report on those trees growing within and adjacent to the development area at 41 Hollycroft Avenue NW3 7QJ and potentially impacted by a proposed development. We are to report on the trees that may be implicated in the development proposal and provide guidance to ensure their long-term health and continued contribution to the amenity of the area.

1.2. Drawings and Documents

1.2.1. We confirm sight of the following documents and drawings prior to the commencement of this report:

- Existing drawing set, drawing numbers 125_P_06, 125_P_09, 125_P_10, 125_P_14, 125_P_19, 125_P_20, 125_P_24, 125_P_30, 125_P_31, 125_P_32, 125_P_35, 125_P_36, 125_P_37, 125_P_40, 125_P_41, 125_P_45, 125_P_46.
- Design and Access Statement by Dominic McKenzie Architects.
- Foundation Plan drawing number S198 by Float structural engineers.
- Scoping Report drawing number S100 by Float structural engineers.

2. Report on site visit

2.1. General

2.1.1. The site was inspected on the 14th of March 2025, all arboricultural data contained in this report was recorded at that time. Weather conditions were bright and sunny with good visibility.

2.1.2. The relevant data was recorded to assess the condition of the trees, their potential constraints on the proposed development and the protection and construction measures required to ensure their long-term retention.

2.1.3. Information is given on condition, size and indicative positions in accordance with British Standard 5837:2012 *Trees in relation to design, demolition and construction – Recommendations*.

2.2. Inspection

2.2.1. Trees likely to be affected by the development were identified and inspected from ground level only.

2.2.2. No invasive examination technique (such as increment boring, or internal decay detection) was carried out. As the inspection was visual only, no guarantee, either expressed or implied, of the internal condition of the wood of these trees can be given. Detailed examinations, such as climbing inspections and decay detection equipment were not employed, though may form part of the survey's management recommendations.

2.3. Marking

2.3.1. The supplied pdf site plan was uploaded to the OTISS online tree survey data collection software for use on site. The position of the plotted trees was accepted as being accurate.

2.3.2. Each reference number on the plan refers to a digital survey entry completed on site to show the following data:

- Sequential tree reference number (recorded on tree survey plan)
- Species - Common name
- Height in metres (approximate)
- Trunk diameter in millimetres, measured in accordance with Annex C of BS 5837:2012
- Crown radius measured at the four cardinal points – where only one measurement is given, the crown is symmetrical
- First significant branch height and direction of growth where applicable
- Crown clearance above ground level
- Life stage (young, semi-mature, early mature, mature, over-mature, veteran)
- General observations, particularly of structural and/or physiological condition, and/or preliminary management recommendations
- Estimated remaining contribution in years (less than 10, 10+, 20+, more than 40)
- Category U or A to C grading in accordance with BS 5837:2012

2.3.3. Survey sheet entries are shown at Appendix A of this report.

2.4. Tree categorisation

2.4.1. Trees vary in, size, age, and landscape importance. All trees were categorised in accordance with the British Standard Trees in relation to design, demolition and construction - recommendations BS 5837: 2012. BS Categories have been entered in the tree schedule and are as follows:

U – Trees unsuitable for retention. Trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.

A - High Category. Trees of high quality with an estimated remaining life expectancy of at least 40 years.

B - Moderate Category. Trees of moderate quality with an estimated remaining life expectancy of at least 20 years.

C - Low Category. Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.

2.4.2. The supplied planning drawings were used to produce a Tree Constraints Plan (TCP_41HOLLYCROFTAV_1) showing the constraints on the existing site from the tree population and TCP_41HOLLYCROFTAV_2 showing the impact of the proposed development on the trees. Finally, a tree protection plan (TPP_41HOLLYCROFTAV_3) is produced showing where protective fencing/ground protection is required and what trees, if any, are to be removed.

2.4.3. The root protection areas (RPAs) have been calculated using Trees in Relation to Design, Demolition and Construction - recommendations BS 5837: 2012. The RPAs of trees implicated in

the construction process have not been adjusted in shape to consider the existing or past site conditions such as the presence of roads, structures and underground services. The full RPA has been retained to show all areas where care is required.

2.4.4. The trunk diameter circle and crown outline show the BS Category in the following colours:

Category U	Dark red
High Quality (A)	Light green
Moderate Quality (B)	Mid-blue
Low Quality (C)	Grey

2.4.5. Trees in Relation to Design, Demolition and Construction - Recommendations BS 5837: 2012 do not include arguments for or against development, or for the removal or retention of trees. Where development is likely to take place, the standard provides guidance on how to decide which trees are appropriate for retention.

2.5. Tree Preservation Orders

2.5.1. The Town and Country Planning (Tree Preservation) (England) Regulations 2012 allows for trees either as groups, or individuals, or as woodlands, to be protected by Tree Preservation Orders (TPO). These have the effect of preventing the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of trees except in certain circumstances, other than with the consent of the local planning authority.

2.5.2. A Conservation Area (CA) is an area designated by the Local Planning Authority as one of "special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". Special controls exist regarding demolition and alteration of buildings; Listed Building Consent must also be obtained for any demolition, even if the building is not itself listed. Similarly, trees are given some protection with the requirement for the local authority to be given six weeks written notice before carrying out any work on trees; this gives the authority time to decide if a TPO is necessary.

2.5.3. Checks using the London Borough of Camden's online resources confirmed the property is within the Reddington Frognaal CA and therefore restrictions in 2.5.2 above apply; there are no TPOs on the trees.

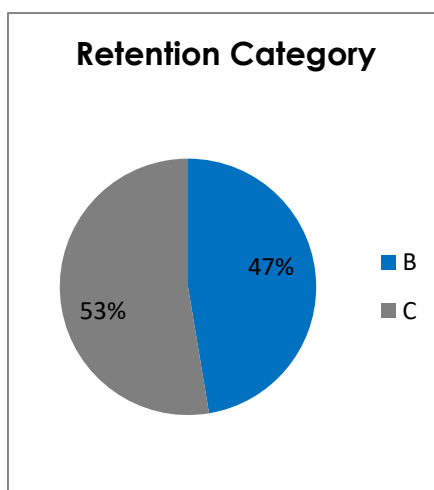
2.6. Brief Site Description

2.6.1. The existing property is a semi-detached four storey house divided into two flats on the east side of Hollycroft Avenue. The area is mainly residential and characterised by large properties with generally mature trees/vegetation to the front and rear of the properties with mature street trees present that are managed by the Council. The front garden has a large Wisteria trained around the front bay window and a group of small trees in formal shrub beds. The rear garden has a number of trees, mainly around the perimeters of varying ages. Neighbouring properties have mature trees, many of which have been managed by pruning. The trees and large shrubs provide screening between properties and contribute to the amenity of the area.

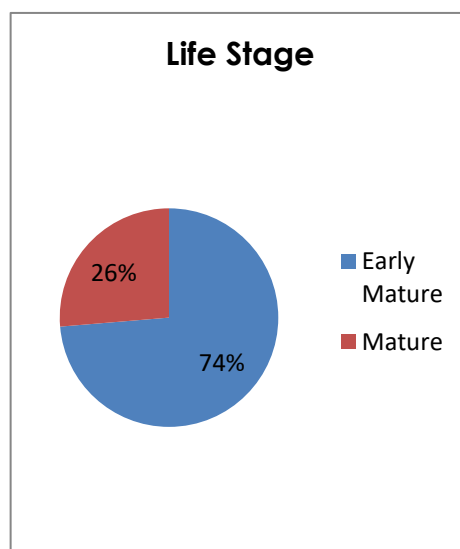
2.7. Tree Survey

2.7.1. The survey included a total of 12 individual trees, 4 groups and 1 hedge potentially impacted by the proposed development. Inspection of the trees followed a defined protocol as per BS 5837:2012 to ensure a systematic and consistent approach and assessment of the condition and value of the trees. Refer to Appendix A Tree schedule for detailed comments, Appendix B for photographs and drawing TCP_41HOLLYCROFTAV_1 for locations.

2.7.2. Refer to the figures below for the tree population summary.



2.7.3. The tree population is fairly evenly distributed to Category B and Category C, whilst the trees are of limited value to the general public, they do contribute to important screening between properties and the Birch is of good form and long-term potential.



2.7.4. The trees are mainly early-mature and mature with few young trees to maintain continuity of tree cover. However, a number of the trees are long-lived species, and the garden is maintained, and it is likely replacements can be planted as and when necessary.

3. Arboricultural Impact Assessment

3.1. General Potential Impacts on Trees

3.1.1. Properly managed trees in urban environments make important contributions to the planning, design and management of sustainable, robust landscapes. They can make cities more pleasant, more diverse and more attractive and healthier places. International literature on the positive health impacts of urban trees is extensive and growing all the time and provides data under the following headings:

- Visual Appeal.
- Air Quality.
- Health & Well-Being.
- Cost Savings.
- Managing Stormwater.
- Property Values.
- Crime Reduction.
- Cooling Effects

3.1.2. Research indicates that even moderate increases in canopy cover within cities can aid adaption to the adverse effects predicted under a changing climate. However, anecdotal evidence suggests a decreasing trend in canopy cover over the past decades. The loss is despite the increasingly large pool of evidence on the social, environmental and economic benefits of trees and green infrastructure.

3.1.3. Given the wide-ranging benefits of urban trees, a number of authorities have set targets for total canopy cover (the area of leaves, branches, and stems of trees covering the ground when viewed from above). For example, Greater London has a target to increase tree canopy cover (TCC) to 25% by 2025 (GLA, 2011).

3.1.4. In view of the importance being placed on not only maintaining trees but increasing the tree canopy cover, large scale developments, particularly in the urban environment, should place major importance on both ensuring retention of trees but also including significant new planting to ensure both continuity and expansion of tree canopy cover.

3.1.5. As noted above, existing trees are an important factor on construction sites, whether on or near the working areas. BS5837:2012 – “Trees in relation to design, demolition and construction – Recommendations” is intended to assist decision-making with regard to existing and proposed trees in the context of design, demolition and construction. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account.

3.1.6. BS5837:2012 - Trees in relation to design, demolition and construction – recommendations have been used to calculate the RPAs. It should be noted that this method is primarily used to calculate the volume of soil required to maintain healthy growth based on the trunk diameter of the tree. In practice, roots may extend beyond this area, and in some cases, the spread may be less. The majority of a tree's root system is generally considered to be in the top 600mm of the soil, extending radially in any direction for distances frequently in excess of the tree's height.

3.2. Potential Site-Specific Impacts.

3.2.1. The proposed development is the demolition of the existing rear extension and construction of a new extension in a curved shape with stairs from the roof to the garden (refer to drawing TCP_41HOLLYCROFTAV_2).

3.2.2. The current design layout does not require the removal of any trees, however, there is a very minor encroachment into the RPA of tree T9. It should be noted that tree T9 is in adjacent property and growing at a higher level than the rear garden, therefore there is likely to be very few roots present at the periphery of the RPA of the tree.

3.2.3. The wisteria (T11) at the front of the property will require cutting back from beneath the existing bay window for the necessary changes to the existing garage. Wisteria is able to tolerate hard pruning so this will not impact on the long-term health of the plant.

3.2.4. Much of the surfacing to the front and rear is paved providing some protection from compaction damage. It is unlikely that heavy plant will operate due to access restrictions, however, should a small digger be utilised then the existing paving should be assessed for its ability to accommodate the load and reinforced with temporary ground protection such as Eve Trakway.

3.2.5. Given the very minor potential impacts noted above, we do not consider that there is going to be an impact on the long-term health of the trees. However, given that some of the proposed developments are within the RPAs of offsite trees, special precautions will be required to ensure that no damage occurs.

3.3. Tree Protection Plan (TPP)

3.3.1. The TPP (drawing TPP_41HOLLYCROFTAV_3) illustrates the location of the protective barriers and ground protection and must be displayed on site in a highly visible area so that all staff involved in the works have a point of reference for tree protection issues.

3.4. Construction Exclusion Zone (CEZ)

3.4.1. For the purpose of this report the CEZ can be defined as all the area within the RPAs of retained trees outside the work areas and the areas behind the tree protection fencing. A warning sign should be placed at regular intervals on the protective fence to emphasise the importance of maintaining tree protection (refer to Appendix C fig. 3 for an example of a suitable sign).

3.4.2. Site operations are not permitted in the CEZs without reference to the Arboricultural Method Statement in this report (refer to section 4 of this report).

3.5. Post Development Implications

3.5.1. Minor crown lifting of tree T4 may be required long-term to clear new stairs to the garden and would involve the removal of small branches that will not impact on the long-term potential of the tree.

3.6. Threats to trees during development

3.6.1. The following information provides detail on how trees may be damaged during developments and an understanding of these mechanisms can help contractors avoid contributing to damage. These processes may be listed, in general terms as:

- Compaction of ground
- Covering rooting areas with impervious surfaces
- Excavations for foundations
- Excavation for service runs
- Alterations in ground level
- Access and movement of machinery
- Need for temporary site storage
- Crown damage by passage of high-sided vehicles

3.6.2. British Standard 5837 (1991) 'Trees in relation to construction' provided useful guidance for the assessment and formulation of measures for the mitigation of such threats. Using the experience gained from this Standard, it was revised and upgraded to 'Recommendation' status as British Standard 5837 'Trees in Relation to Construction' (2005). This British Standard was withdrawn on 30th April 2012 and replaced with Trees in Relation to Design, Demolition and Construction - Recommendations BS 5837: 2012. To assist in the prediction of the likely impact of development on retained trees, a model is used. This model is based on the age, vitality and size of individual specimens.

3.6.3. The British Standard relies heavily on the creation of a protected zone (RPA) around each tree. This area should be protected from disturbance "in order to avoid unacceptable damage to the tree as a result of severance or asphyxiation of the root system." The recommended minimum area (m²) for each tree to avoid potentially harmful disturbance have been calculated for all the trees on site and entered into the tree schedule (Appendix A).

3.6.4. BS 5837: (2012) acknowledges that the shape of the tree root system may be affected by several factors and that the shape of the RPA should reflect this. Any deviation in the RPA from the original circular plot should take account of the following factors whilst still providing adequate protection for the root system:

- a) the morphology and disposition of the roots, when influenced by past or present existing site conditions (e.g., the presence of roads, structures and underground apparatus).
- b) topography and drainage.
- c) likely tolerance of the tree to root disturbance or damage based on factors such as species, age, condition and past management.

3.7. Root Damage

3.7.1. Trees that are growing satisfactorily have achieved equilibrium with their surroundings. Any construction work that affects this equilibrium could be detrimental to health, future growth and the safety of the tree.

3.7.2. The part of the tree most susceptible to damage is the root system, which, because it is not immediately visible, is frequently ignored. Damage or death of the root system will affect the health, growth, life expectancy and safety of the rest of the tree. The effects of such damage may only become evident several years later.

3.7.3. The majority of a tree's root system is considered to be in the top 600mm of the soil, extending radially in any direction for distances frequently in excess of the tree's height. However, roots are adventitious and if conditions suitable for root development exist to a greater depth, the roots may extend to depths of three metres or more. Works within the root spread may damage the root system.

3.7.4. Close to the trunk are the main structural roots that develop in response to the tree's need for structural stability. Beyond these major roots, the root system rapidly subdivides into smaller diameter roots; off this main system a mass of fine roots develops.

3.7.5. Tree root systems can be damaged in a number of ways during construction works:

- **Root severance.** Severing of a root will destroy all parts of the root beyond that point. Even roots less than 10mm diameter may be serving a mass of fine roots over a large area. The larger the root severed, potentially the greater the impact on the tree. However, there is some evidence from research regarding the total impact of root severance on the tree, see section 3.6.8 below
- **Damage to root bark.** The bark protects the root and is essential for further root growth; it is loosely attached and easily damaged. If damage extends around the whole circumference, the root beyond that point will be killed.
- **Compaction of the soil.** Compaction of the ground reduces the space between soil particles, particularly in clay soils. A single passage of heavy equipment or the storage of materials can cause considerable damage. Compaction can restrict or even prevent gaseous diffusion through the soil and thereby asphyxiate the roots. The roots must have oxygen for survival, growth and effective functioning.
 - **Alterations in ground levels.** Lowering the level will strip out the mass of roots near to the surface. Raising the ground levels will have the same effect as compaction.
 - **Covering the rooting area with impervious surfaces.** This prevents natural diffusion of gases between the soil and the atmosphere and can lead to oxygen depletion in the soil.
- **Direct toxicity of some materials.** For instance, petrol or diesel spillage or lime in cement can kill roots.
- **Wounding.** Minor wounds to root bark can allow pathogens into the tree root system that can lead to a further impairment of water absorption. The general debilitation of trees due to root severance can make them more susceptible to invasion by some decay fungi such as *Armillaria* spp.
- **Fine roots.** Damage to the fine roots by severance of a main root, or by compaction, or by alteration of levels, will prevent the fine roots absorbing the water and nutrients essential for tree growth. The effects of damage from different causes will be cumulative.

3.7.6. The effects of tree root damage may not be immediately apparent. If the root system is capable of rapid regeneration, the tree may recover without noticeable ill effects, though usually symptoms take several years to develop. The range of symptoms varies from minor branch-dieback to deterioration and ultimate tree death depending on the severity of the damage and the ability of the roots to regenerate.

3.7.7. The default position should be that structures are located outside the RPAs of trees that are to be retained. The cumulative effects of incursions into the RPA e.g., from excavations for utility apparatus are damaging and should be avoided. Where there is evidence that a tree has been previously subjected to damage by construction activity this should be taken into account when considering the acceptability of further activity within the RPA.

3.7.8. There is a common belief that root severance will result in the loss of the tree due to instability or from physiological reasons, however, this is not backed up by any in-depth research. In comparison, a number of studies have been carried out involving severing roots at varying distances from the trunks and monitoring stability and health (the relevant studies are listed below).

- Miller, F D Jr. 2005. The Effect of Trenching on Growth and Overall Plant Health of Selected Species of Shade Trees. In the Landscape Below Ground, Proceedings of an International Workshop on Tree Root Development in Urban Soils. pp 157 to 164
- Watson, G W. 1998. Tree growth after trenching and compensatory crown pruning. Journal of Arboriculture. Friary Press, Dorchester
- Crane, B. G., 2014. Initial Results from a Long-Term Study of the Effects of Root Damage on Street Trees. Presentation to the International Society of Arboriculture European Conference, Turin May 2014
- Fini, A., Frangi, P., Amoroso, G., Piatti, R., Robbiani, E., Sani, L., Bonanomi, L., Blotta, V., Ferrini, F. Effects of root severance by excavation on growth, physiology and stability of two urban tree species: results from a long-term experiment

3.7.9. Watson (1998) severed roots in experimental conditions on 1, 2 and 3 sides of trees in 1994 without noticeable ill effects and all trees were still in place in 2013.

3.7.10. Crane (2014) studied trees that had major roots severed, some within 1m of the tree during trenching works for cable TV. After several years, the trenches were opened, and it was noted that there had been significant root regeneration, and the trees remained healthy. Data analysis showed that surviving trees had continued to grow in girth and that differences in percentage losses between damaged and control trees was insignificant.

3.7.11. The results of all studies above showed no significant impact on trees receiving the varying treatments and the controls. Fini *et al* (2014) did record an initial reduction in above-ground tree growth but no long-term impact.

3.7.1. Summary of impact

Impact	Reason	Low value (Cat C & U) trees	Moderate value (Cat B) trees	High value (Cat A) trees	Potential design & mitigation techniques
Trees to be removed	Building construction and/or surfacing	N/A	N/A	N/A	N/A.
	Arboricultural reasons	N/A	N/A	N/A	N/A.
Retained trees to be managed	Enabling works/space for development	Tree 11	Tree 4	N/A	Minor crown pruning may be required to clear the rear extension during construction to avoid damage
Retained trees that may be damaged	Removal of existing structures	N/A	N/A	N/A	Demolition does not impact the trees
	Removal of existing surfacing	All retained trees	All retained trees	N/A	Ground protection and excavation using hand tools within the RPAs where necessary and applicable.
	Material storage/washing areas/welfare areas	N/A	N/A	N/A	There is adequate space outside RPAs within the site to designate areas for storage.
	Temporary access to construction areas	N/A	N/A	N/A	There is only side access to the rear garden area. The potential for plant to operate is limited.
	Installation of new structures	N/A	Tree 4	N/A	There are minor encroachments into the RPAs of the existing trees from construction.
	Installation of new surfacing	N/A	Tree 9, 10	N/A	All excavations must be carried out using hand tools within the RPA including landscaping
	Excavations or ground level changes	N/A	Tree 9	N/A	All excavations must be carried out using hand tools within the RPAs.
	Installation of services*	N/A	N/A	N/A	Any new services must be routed outside the RPAs if they cannot use existing services.
	Landscaping works	All retained trees	All retained trees	All retained trees	All levelling/plantings must be carried out using hand tools within the RPAs. No motorised cultivators within the RPAs

4. Arboricultural Method Statement

4.1. Phase 1: Undertake Approved Tree Works.

4.1.1. All tree works should be undertaken prior to any site works commencing. Motorised vehicles will be restricted to areas of existing compacted/hard surfaces, or where ground protection is in place, and should not be taken onto un-surfaced areas within the root protection areas (as shown on drawing TPP_41HOLLYCROFTAV_3). Refer to Table 4.1.2 below for tree works.

4.1.2. Tree work specification:

Tree No.	Recommended Works
Tree T11	Cut back Wisteria from underneath front elevation bay window

4.2. Phase 2

4.2.1. All materials storage and mixing will be confined to areas outside the RPAs of the retained trees. Where mixing of materials is undertaken close to the RPAs, this should be on an impervious surface with no run-off to prevent chemical contamination of the RPA.

4.2.2. Protective fencing will be required to protect the trees from potential damage from the storage of materials and the movement of any plant. Refer to drawing TPP_41HOLLYCROFT_3 for location of protective fence/ground protection and Appendix C section 1.2 for examples of suitable fencing. All protection measures must be in place before any construction starts and must not be moved/removed during construction unless there is a requirement for access and only when alternative protection is agreed in writing. All protection measures must remain in place until completion of the scheme and no more construction activity is likely.

4.3. Access

4.3.1. There is existing pedestrian access to the proposed development.

4.4. Foundations/excavations

4.4.1. Excavations for the new extension just clip the periphery of the RPA of tree T9. Special precautions will be required to ensure that if there are significant roots present, they are protected or severed in the correct manner. The foundation line within the RPA must be excavated using hand tools (spades, forks and trowels) to determine if significant roots are present (refer to Appendix C section 1.5 to 1.7). The excavation should be continued down to approximately 600mm to expose any roots that may be present. Roots 2.5cm diameter and less will be severed using sharp secateurs. Where a mass of small flexible roots is present it may be possible to displace them permanently away from the predicted face of the new foundation for the extension. Should roots larger than 2.5cm diameter be encountered, arboricultural advice will be sought to determine if the roots can be severed without long-term

damage to the trees. If large roots are present and must be retained, the foundation will require redesign to bridge the roots and may require additional engineering input.

4.4.2. The excavation for the foundations must be lined with an impermeable membrane on the outside face to prevent concrete coming into contact with tree roots as it is toxic. If the hand excavated trench finds no roots the membrane will not be required.

4.5. New surfacing

4.5.1. Any excavation/changes in surface within the RPAs **must** be carried out with care as set out in Appendix C section 1.5. Whilst the volume of roots within the RPA may vary, the indicative RPA must be used to determine where hand tools and supervised excavation are essential. All excavations must be carried out using hand tools (spades, forks and trowels) and taking care not to damage bark and wood of the roots. Refer to Appendix C section 1.5 to 1.7.

4.6. Landscaping

4.6.1. All trees near new soft landscaping may be adversely affected by this activity. All landscaping activities within the RPAs has the potential to cause considerable damage and any impact must be minimised by following the guidance set out in Appendix C section 1.8.

4.7. Services

4.7.1. Services are not required.

4.8. Other tree related site works

4.8.1. **Site supervision:** Site visits by a competent arboriculturalist may be required by the local planning authority to advise on any tree issues or modifications that may arise. The developer must ensure that all conditions of the arboricultural method statement and any amendments are known and fully understood by all site personnel.

4.9. General

4.9.1. **Limitations of report:** This report is intended to highlight the potential for damage to the retained tree population from the proposed development and provide guidance on how to avoid or minimise that potential. The content may require amending following input from the Council or if onsite conditions dictate a change in design.

4.9.2. **Arboricultural Standards:** Any tree works should be done in accordance with the British Standard Recommendations for Tree work, BS 3998:2010 as modified by later research. Works should be undertaken by properly qualified and experienced tree contracting company as recommended by a local authority or one approved by the Arboricultural Association. A Register of Contractors is available from:

The Arboricultural Association

The Malthouse
Stroud Green
Standish
Stonehouse
Gloucestershire GL10 3DL
UKTel +44 (0) 1242 522152
Fax +44 (0) 1242 577766
Email: admin@trees.org.uk.

4.9.3. Statutory wildlife implications: Wildlife in this country is afforded protection under the Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000. Statutory protection is given to birds, bats and other species that inhabit trees. Tree work is governed by these statutes and advice should be sought from an ecologist before undertaking any works that may constitute an offence.

- If the intention is to complete tree work between the 1st of March and the end of August, a due diligence check for nesting birds must be completed before work starts in order to comply with the Wildlife & Countryside Act 1981. Arborists should record such checks in their site-specific risk assessment. If active nests are found work should not take place until the young have fledged.
- A due diligence check for bats and likely habitats must be completed before work starts in order to comply with the Wildlife & Countryside Act 1981. Arborists should carry out and record such checks in line with BS8596:2015 Surveying for bats in trees and woodland in their site-specific risk assessment. If bats or potential roosting features are found work must not start until an appropriately licenced bat handler has been engaged.

Report: Graham Causey B. Sc (Hons), F. Arbor.A. R.F.S Cert Arb. Lantra accredited professional tree Inspector

Checked by: Fiona Critchley MICFor

B. Sc. (sp. Hons), RFS (Cert Arb), Arbor. A. Tech Cert., F. Arbor. A. LANTRA accredited Professional Tree Inspector.

APPENDIX A TREE SCHEDULE

Tree No.	Species	Height (m)	DBH (mm)	Crown radius (m)				Lowest Branch Dir	Lower crown height (m)	Life stage	General observations	Est. Rem'ing contrib'n	BS Cat	RPA (m)
				N	E	S	W							
G002	Mixed species	3.0	70	2.0	2.0	1.0	2.0			Early Mature	Mixed evergreen shrubs	10+	C2	Area: 17 sq m.
G003	Lime	12.0	550	2.0	2.0	2.0	2.0			Mature	Trees have been topped Heavy ivy in 1 crown Screening between properties In neighbouring property	30+ Years	B2	Area: 92 sq m.
G004	Mixed shrubs	2.0	50	1	1	1	1			Early Mature	Mixed shrubs not considered impacted	10+	C2	Area: 42 sq m.
H001	Privet	2.5	30	0.5	0.5	0.5	0.5		0.0	Early Mature	Maintained	20+ Years	C2	Area: 57 sq m.
T001	Castor oil tree	2.5	40	0.5	1.0	1.0	11.0		0.5	Early Mature	Multi-stemmed In hard surface Little visibility	20+ Years	C1	Radius: 1.5m. Area: 7 sq m.
T002	Smoke bush	2.0	60	0.5	1.0	1.0	1.0		1.0	Early Mature	Limited visibility Leaning stem	20+ Years	C1	Radius: 1.0m. Area: 3 sq m.
T003	Fir	2.0	50,80	0.0	1.0	2.0	2.0	0.5(SW)		Early Mature	Significant lean then straightens Trunk propped at base	20+ Years	C1	Radius: 1.1m. Area: 4 sq m.
T004	Himalayan birch	10.0	190	4.0	4.0	4.0	4.0	2(W)	2.5	Early Mature	Full healthy crown Good form 4:7 from flank 3.8 from door 4.9 from other side of door	30+ Years	B1	Radius: 2.3m. Area: 17 sq m.
T005	Strawberry tree	5.0	100,80	2.0	0.0	1.0	4.0		1.5	Early Mature	Twin-stemmed Trunk forks below 1.5m Significant lean west Asymmetric crown Little visibility outside the site	10+ Years	C1	Radius: 1.5m. Area: 7 sq m.
T006	Yew	15	320,410,310 No stems: 3, ave diam: 605mm	4.0	3.0	5.0	5.0		3.0	Early Mature	Trunk forks below 1.5m Light ivy in crown Full healthy crown	50+ Years	B1	Radius: 7.3m. Area: 167 sq m.
T007	Yew	16	630	5.0	6.0	4.0	2.0		2.5	Early Mature	Asymmetric crown Suppressed by adjacent Yew Screening between properties	50+ Years	B1	Radius: 7.6m. Area: 181 sq m.
T008	Oak	18.0	600	4.0	4.0	4.0	6.0			Early Mature	Tree has been reduced In adjacent property	50+ Years	B2	Radius: 7.2m. Area: 163 sq m.

Tree No.	Species	Height (m)	DBH (mm)	Crown radius (m)				Lowest Branch Dir	Lower crown height (m)	Life stage	General observations	Est. Rem'ing contrib'n	BS Cat	RPA (m)
				N	E	S	W							
T009	Holm oak	9.0	550	3.0	3.0	3.0	3.0		2.5	Early Mature	DBH estimated Height reduced in the past Trunk forks above 1.5m Screening between properties In neighbouring property Growing above level of site	40+ Years	B2	Radius: 6.6m. Area: 137 sq m.
T010	Bay tree	10.0	130,190,210 No stems: 3, ave diam: 312mm	2.0	2.5	3.0	3.0		2.0	Early Mature	In raised planter Multi-stemmed at ground level Branches encroaching on building	20+ Years	C2	Radius: 3.7m. Area: 43 sq m.
T011	Wisteria	2.0	50	0.5	0.5	0.5	0.5		0.0	Mature	Trained along drive and bay window	10+	C2	Radius: 0.0m. Area: 51 sq m.
T012	Willow sp.	3.0	250	0.0	1.0					Early Mature	Topped at 1.6m Extensive decay at topping point Significant lean northeast Trunk propped up Crown dieback Light deadwood Declining condition	<10 years	C2	Radius: 3.0m. Area: 28 sq m.

KEY

H = Hedge

G = Group

B = Shrubs

K = Small tree



W = Woodland

RPA-R (m) = RPA of radius x metres



TREE QUALITY ASSESSMENT CASCADE CHART

Category and definition	Criteria (including subcategories where appropriate)		
Trees unsuitable for retention Category U	Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years	<ul style="list-style-type: none"> • Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) • Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline • Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low-quality trees suppressing adjacent trees of better quality <p><i>NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve</i></p>	
Trees to be considered for retention	1 Mainly arboricultural qualities	2 Mainly landscape qualities	3 Mainly cultural values, including conservation
Category A Trees of high quality with an estimated remaining life expectancy of at least 40 years	Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features	Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)
Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years	Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural value
Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value




Appendix B

Ref.	Species	Retention Category	Notes	Photo
G002	Mixed species	C2		No Photo
G003	Lime	B2	Topped Lime trees in neighbouring property	
G004	Mixed shrubs	C2	Mixed shrub group	
H001	Privet	C2		No Photo





Predevelopment Survey

Ref.	Species	Retention Category	Notes	Photo
T001	Castor oil tree	C1		No Photo
T002	Smoke bush	C1		No Photo
T003	Fir	C1	Located in front garden	
T004	Himalayan birch	B1	Tree of good form and long-term potential	


Predevelopment Survey

Ref.	Species	Retention Category	Notes	Photo
T005	Strawberry tree	C1	Supressed with leaning stems	
T006	Yew	B1	Screening between properties	
T007	Yew	B1	Screening between properties	

Predevelopment Survey

Ref.	Species	Retention Category	Notes	Photo
T008	Oak	B2	Growing in neighbouring property	
T009	Holm oak	B2	Growing in neighbouring property	
T010	Bay tree	C2	Close to rear elevation and branches against wall	
T011	Wisteria	C2	Trained Wisteria in front garden	

Predevelopment Survey

Ref.	Species	Retention Category	Notes	Photo
T012	Willow sp.	C2	Tree with significant lean and decay at topping point	

APPENDIX C TREE PROTECTION

1.1. Pre-commencement site meeting.

1.1.1. A pre-commencement site meeting is advised prior to any works commencing on site, to agree all the approved processes with the relevant concerned parties.

1.2. Protective fencing and ground protection.

1.2.1. All trees to be retained on site should be protected by barriers and ground protection where applicable. Barriers should be in place before any materials or machinery is brought onto site. Once in place, barriers and ground protection should be considered sacrosanct and should not be altered or removed without prior recommendation by an arboriculturist and approval of the local planning authority. Barriers should be fit for excluding construction activity and appropriate to the degree and proximity of work taking place around the retained tree(s). Barriers should be maintained to ensure that they remain rigid and complete.

1.2.2. The protective fencing is to be erected prior to any site works or demolition works.

1.2.3. The barrier is to comprise of a vertical and horizontal framework (Figure 1 below), well braced to resist impacts, with vertical tubes spaced at a maximum interval of 3m. Weldmesh panels, such as Heras, should be securely fixed with wire or scaffold clamps to this framework. Weldmesh panels on rubber or concrete feet are not resistant to impact and should not be used. Care should be exercised when locating the vertical poles to avoid underground services and, in the case of the bracing poles, also to avoid contact with structural roots. If the presence of underground services precludes the use of driven poles, an alternative specification should be prepared in conjunction with the project arboriculturist that provides an equal level of protection. Such alternatives could include the attachment of the panels to a freestanding scaffold support framework.

1.2.4. Where retained trees are near the existing buildings, a higher specification hoarding will be required to prevent damage from falling rubble. In place of the weldmesh, panels solid hoarding should be used, for example, scaffold boards.

1.2.5. Where the site circumstances and associated risk of damaging incursion into the RPA do not necessitate the default level of protection, an alternative specification should be prepared by the project arboriculturist and, where relevant, agreed with the local planning authority. For example, 2m tall, welded mesh panels on rubber or concrete feet might provide an adequate level of protection from cars, vans, pedestrians and manually operated plant. In such cases, the fence panels should be joined together using a minimum of two anti-tamper couplers, installed so that they can only be removed from inside the fence. The distance between the fence couplers should be at least 1 m and should be uniform throughout the fence. The panels should be supported on the inner side by stabilizer struts, which should normally be attached to a base plate secured with ground pins (Figure 2 below). Where the fencing is to be erected on retained hard surfacing or it is otherwise unfeasible to use ground pins, e.g., due to the presence of underground services, the stabilizer struts should be mounted on a block tray

1.2.6. It is advised that a plan be pinned up on site in highly visible areas such as in the site huts, so that all ground staff involved in the demolition and construction works have a point of reference for tree protection issues. All demolition and construction workers should be briefed on the importance of tree protection prior to works commencing. Special attention must be paid to ensure that protective fencing remains rigid and complete during all works.

1.2.7. Where it is agreed that vehicular or pedestrian access for construction purposes is necessary within the RPA, ground protection measure will be required to prevent damage to the soil structure within the RPA.

1.2.8. For pedestrian access within the RPA, the installation of ground protection in the form of a single thickness of scaffold boards over a compressible layer laid onto a geotextile, or supported by scaffold, is likely to be acceptable

1.2.9. For wheeled or tracked vehicle, access within the RPA an engineer should design the ground protection to accommodate the likely loading and may involve the use of proprietary systems or reinforced concrete slabs. The structure must use a no dig design (see methodology described in 1.7 below) to prevent root severance and must prevent localised soil compaction by distributing the load across the track width. Such a system may include the use of three-dimensional cellular confinement systems (CCS) as a component of the sub-base, to act as a load suspension layer

1.2.10. New permanent hard surfacing should not cover more than 20% of the RPA or be wider than 3m within it; it should be constructed to be permeable to moisture and gas.

1.3. Construction exclusion zone

1.3.1. Once the construction exclusion zone (CEZ) has been protected by barriers and/or ground protection, demolition/construction can take place

Inside the Construction Exclusion Zone (CEZ) of the protective fencing, the following prohibitions shall apply:

- No mechanical digging or scraping
- No hand digging
- No storage of plant, equipment or materials
- No vehicular or plant access
- No fire lighting
- No washing down of vehicles or machinery
- No handling, discharge or spillage of any chemical substance, including cement washings
- No action likely to cause localised waterlogging
- No change in ground levels
- No construction of a hard surface
- No earthworks

1.3.3. To inform site personnel of the purpose of the fencing, information notices shall be fixed to the fencing at 5m intervals. These notices shall be of all-weather construction and shall be in the form of the example provided at Figure 4 below and replaced as and when necessary.

1.3.4. In addition to the above, further precautions are necessary adjacent to trees outside the CEZ:

- Materials that will contaminate the soil, e.g., concrete mixing, diesel soil and vehicle washings, should not be discharged within 10 metres of the tree stem. This should take into consideration the topography of the site and slopes to avoid materials such as concrete washings running towards trees.
- Fires should not be lit in a position where their flames can extend to within 5m of foliage, branches or trunk. This will depend on the size of the fire and the wind direction.
- Notice boards, telephone cables or other services should not be attached to any part of the tree.

1.4. New Services

1.4.1. **Service connections:** The location of all new service routes should ideally be outside of the root protection zones of the trees to be retained to avoid damage to tree roots. All proposed service installations should be carried out in accordance with the guidelines set out in NJUG Publication No.10, and Section 11.3.5 and 11.7 of BS5837:2005. Great care should be taken to preserve and work around roots greater than 25mm in diameter, and clusters of smaller roots avoiding damage to bark. Where it is necessary to sever roots greater than 25mm in diameter, arboricultural advice must be sought. Where smaller roots must be severed, they should be cut back cleanly using secateurs or a sharp pruning saw. Where possible, services laid through protected areas need to be installed at a depth preferably not less than 750mm deep in order to preserve the maximum number of roots and avoid conflicts between the tree roots and the utility service run. The trench should be kept as narrow as possible to reduce the potential amount of root severance. Continuous trench should only be used as a last resort and broken trench should be used, combining hand-dug sections with trenchless techniques, (refer to the National Joint Utilities Group Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2: Section 4.1- How to avoid damage to trees – Below ground).

1.4.2. Backfilling of trenches should be carried out using the excavated soil, which should be worked in around roots and lightly “tamped” not compacted and preserving the original soil profile. The backfill should be left proud of surrounding levels to allow for settlement. Trenches must not be left open overnight, and arboricultural supervision should be provided during excavation of trenches through protected zones. If the trench is to remain open for any period during the day to prevent the roots from drying out, it is advised that moist Hessian sacking be wrapped around the exposed roots, and/or trench to prevent desiccation from occurring. All existing site services that are already within the root protection areas that are to be made redundant will still need to comply with the above in order to prevent any damage to roots within these areas.

1.5. Excavating in RPAs

1.5.1. All excavations must be carried out using hand tools (spades, forks and trowels) and taking care not to damage bark and wood of the roots. It is acceptable to use a pneumatic hammer carefully to break up any existing hard surface for removal. Specialist tools (air spade) may be suitable in certain situations to remove soil from around the roots. All soil removal must be undertaken with care to minimise the disturbance of roots beyond the immediate area of the excavation. Where a mass of flexible roots is encountered, it may be possible either to displace the roots to another location temporarily or permanently to avoid areas of excavation. Exposed roots to be removed should be cut cleanly with some sharp saw or secateurs approximately 20cm back from the face of the final excavation. Roots that are exposed temporarily should be protected from drying out, direct sunlight and extremes of temperature by suitable covering. Roots greater than 2.5cm diameter should be retained where possible; roots up to 10cm diameter should only be cut in exceptional circumstances and roots greater than 10cm should only be cut after consultation with the appropriate supervising officer.

1.5.2. Working within RPAs requires a high level of care to ensure the long-term potential of the trees. Qualified supervision is vital to minimise the risk of misinterpretation. Site personnel must be properly briefed before work commences and ongoing work should be regularly inspected by an arboriculturist to confirm compliance by the contractor.

1.6. Removing Surfacing in RPAs

1.6.1. Roots are frequently found beneath or adjacent to existing surfacing or built structures and care is needed. Damage to the roots may be by direct physical damage or compaction of the soil from the weight of plant and machinery or repeated pedestrian movement. This is generally not a problem whilst surfacing is in place as the load is spread and additional protection is not required. However, once the existing surface is removed and the soil below exposed significant damage can occur to the soil structure and directly to the roots in a very short time. The following rules must be followed:

1. No vehicular activity or repeated pedestrian access into the RPAs unless on existing hard surfacing or custom designed ground protection, this must be designed for anticipated loads.
2. Regular vehicle and pedestrian access routes must be protected from compaction by temporary ground protection.
3. RPAs exposed by the works must be protected as set out in BS 5837:2012 until there is no risk of damage from construction activity

1.6.2. Appropriate tools for manually removing debris may include a pneumatic breaker/drill, crowbar, sledgehammer, pick, mattock, shovel, spade, trowel, fork and wheelbarrow. Secateurs and a bow saw must be available to deal with any exposed roots that have to be cut. Machines with a long reach may be used if they can work from outside RPAs or from areas protected by ground protection designed for the loading within the RPA. Debris to be removed from RPAs manually must be moved across existing hard surfacing or temporary ground protection to prevent compaction damage. If possible, leaving below ground structures in place should be considered if their removal may cause excess root disturbance.

1.7. Installation of new Surfacing in RPAs

1.7.1. New surfacing is potentially damaging to trees as it may require changes to existing levels, result in localised soil structure damage and disrupt the exchange of water and gases in and out of the soil. Mature or older trees are more sensitive to this type of damage than younger trees. Potential adverse impacts on the trees can be minimised by limiting the extent of these changes. The most suitable surface will be porous to allow the relatively free movement of gas and water and load spreading to limit compaction damage. The actual specification is an engineering issue that must be considered in the context of the load-bearing capacity of the soil; this element requires specialised input from the appropriate professional.

1.7.2. The actual location and depth of roots is unpredictable and will only become clear once excavation starts and following the guidance in section 1.5 above. Ideally, all new surfacing in the RPAs will be no dig, but this is rarely possible on undulating surfaces. New surfacing generally requires an evenly graded sub-base which can be made up to any high points with granular, permeable fills such as crushed stone or sharp sand; this sub-base must not be compacted as in a normal installation. Some limited excavation is usually necessary to achieve this and need not be damaging to the tree if carried out with care and avoiding cutting large roots. Tree roots generally do not occupy the top 5cm of soil, so the removal of a turf layer need not cause root damage. It may be possible to dig to a greater depth with care and dependant on local conditions. On undulating surfaces, finished levels must be carefully planned and flexible enough to allow on-site adjustment if excavations reveal large roots. Roots of 2.5cm diameter and less can normally be cut without a significant impact on the tree and the minimal 5cm depth can be used. If roots larger than 2.5cm diameter are encountered and it is considered inappropriate to cut them by a suitably qualified professional, the surrounding levels must be adjusted to take into account the high points by infilling with a suitable material.

1.7.3. Generally, the construction of hard surface access within the root protection area is to be that of a 'no-dig' design to avoid root loss due to excavation. In addition, the structure of the hard surface should be designed to avoid localised compaction, evenly distributing the carried weight over the track width and wheelbase of any vehicles that will use the access. The design will be based on a cellular confinement system as an integral component of the sub-base, to act as a load suspension layer.

1.7.4. The finished surface will be either a granular material, permeable and gas-porous finished surface (wearing course) to allow moisture infiltration and gaseous diffusion. It is essential to maintain adequate supplies of water and oxygen for trees through the soil. Porosity is important particularly where the new hard surface covers an area of previously unmade ground, under which tree roots may have developed preferentially.

1.7.5. No-fines granular materials should be used wherever fill or a sub-base is required to help to ensure adequate gaseous diffusion. Excess water in the root protection area should be avoided, particularly on clay soils where water logging can occur. In these cases, the hard surface should slope away from the tree to avoid ponding. Provided surface water is not liable to be contaminated by salt or toxic run-off from oil or petrol, a permeable surface should be employed.

1.7.6. Washed gravel

Washed gravel retains its porosity unless excessively consolidated, and is particularly useful where changes of level occur, or an irregular shape is needed around the stem of a tree. Gravel is easily renewed or topped up. Although weeds may become established, they can be controlled by chemical or mechanical means. However, gravel is rarely suitable for use where there is vehicle or pedestrian traffic for example, in residential areas. Materials with high fines content, such as binding gravels or hogging, should not be used due to their almost impermeable texture when consolidated

1.7.7. Paving slabs and block pavers

Paving slabs and block pavers are available with built in infiltration spaces between the slabs or blocks. These are ideal, though they should be laid dry-jointed on a sharp sand foundation to allow air and moisture to penetrate to the rooting area.

1.7.8. Graded Soil

Sufficient spoil shall be placed along the edge of the area to receive Geoweb, suitably graded away from the works in order that it may be pulled in later. This eliminates the need to transport soil over the finished surface. The spoil (e.g., Heicom sand) shall be graded into the finished structure at the end of the scheme.

1.7.9. Construction

Refer to Fig 4 for a general overview of a typical installation with porous tarmac (illustration courtesy of Geosynthetics Ltd). The depth of CellWeb will be dependent on the expected loads and should be based on the manufacturer's recommendation.

1.8. Soft Landscaping

1.8.1. Soft landscaping includes the re-profiling of existing soil levels and covering the soil surface with new plants or an organic covering (mulch). It does not include the construction/installation of solid structures or compacted surfacing. No significant excavation or cultivation, especially by rotovators, should be carried out within the RPAs. Where new designs require levels to be increased to tie in with new structures or the removal of an existing structure has left a void below the surrounding ground level, good quality and relatively permeable topsoil should be used for the fill. It should be firmed into place but not over compacted in preparation for turfing or careful shrub planting.

Figure 1: Tree Protective fencing

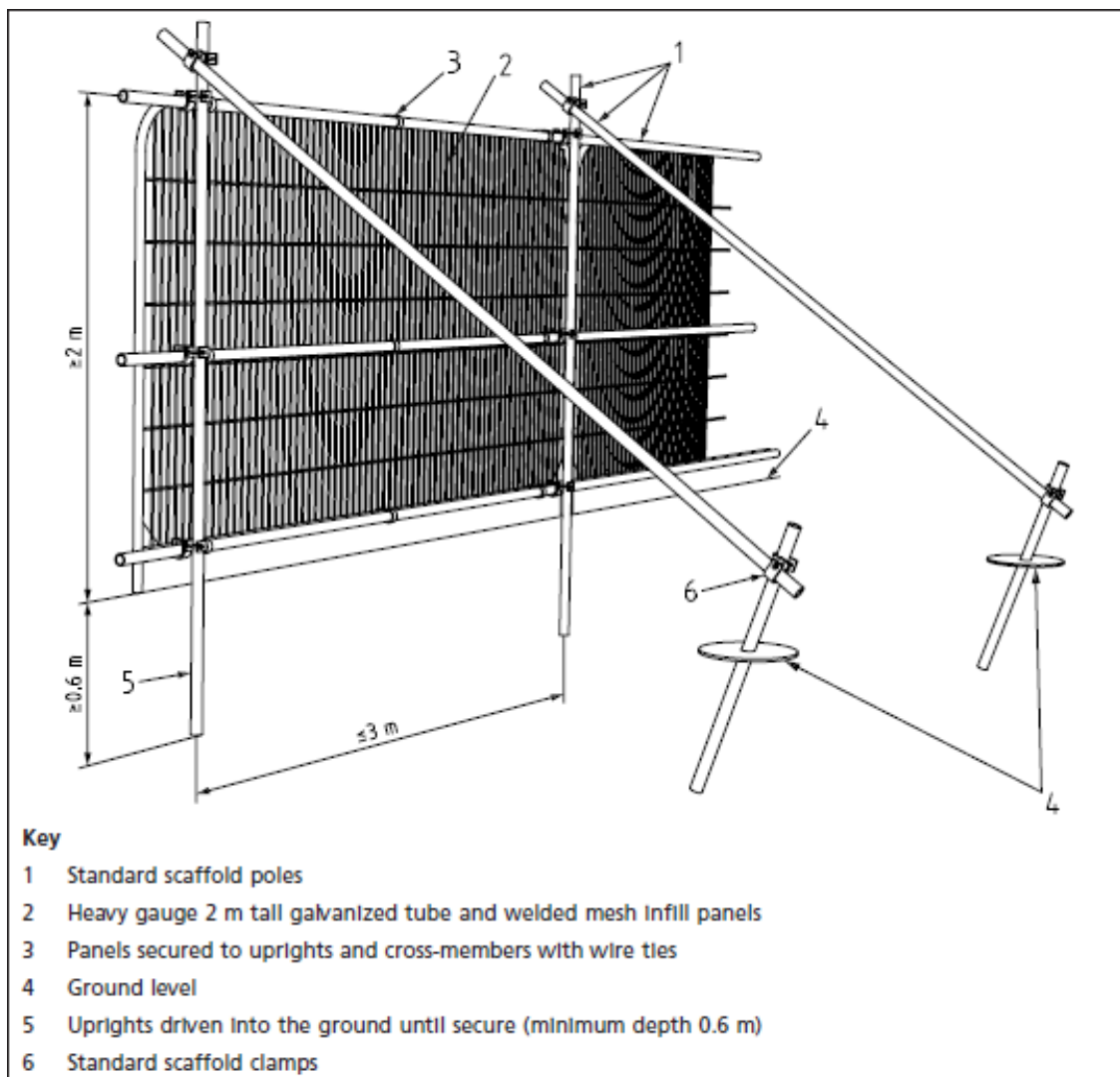


Figure 2: Tree Protective fencing (alternative)

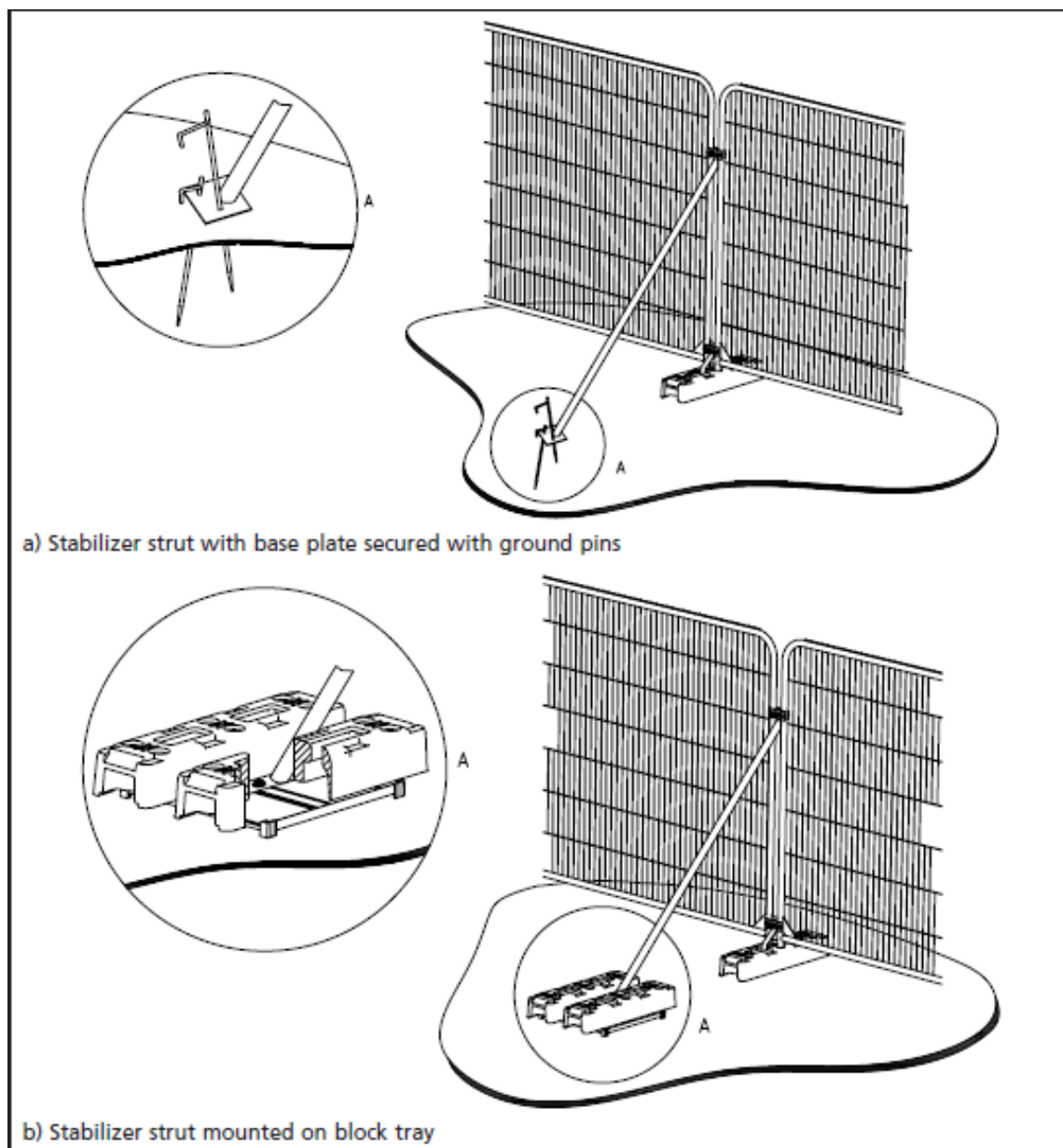
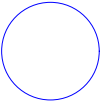


Figure 3: Example of warning notice

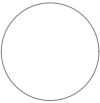




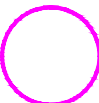
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BS CAT B



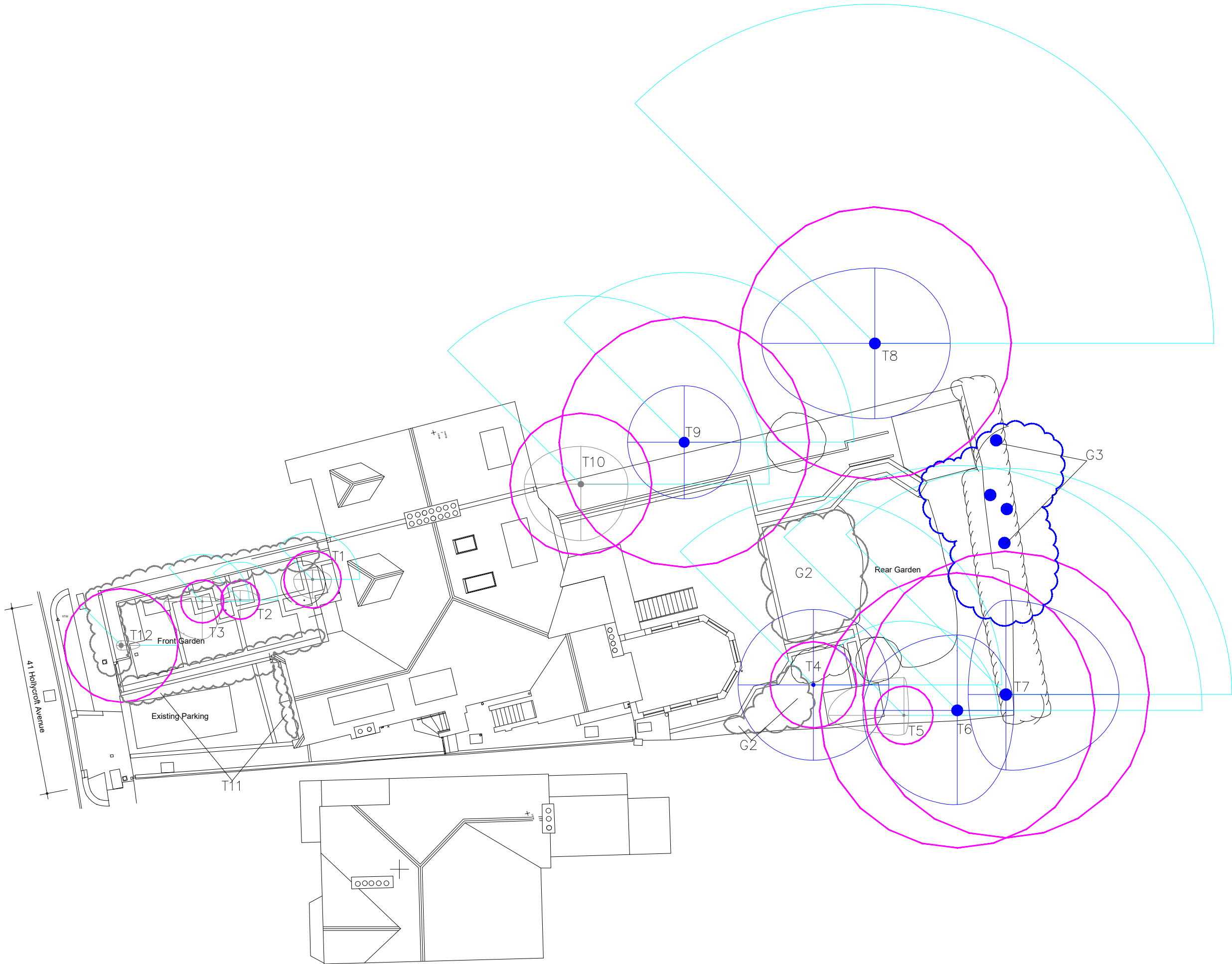
BS CAT C



ROOT PROTECTION
AREA (RPA)



TRUNK DIAMETER



DRAWING TITLE
TREE CONSTRAINTS PLAN
EXISTING SITE

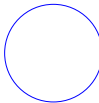
PROJECT
41 HOLLYCROFT AVENUE

CLIENT
EVELYN PETERS
& DINO PAPARELLI

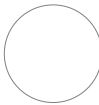
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SURVEYOR	GMC	DATE	14/3/2025
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DRAWING No.	TCP_41HOLLYCROFTAV_2		

NO.	DATE	REVISION

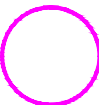
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BS CAT B



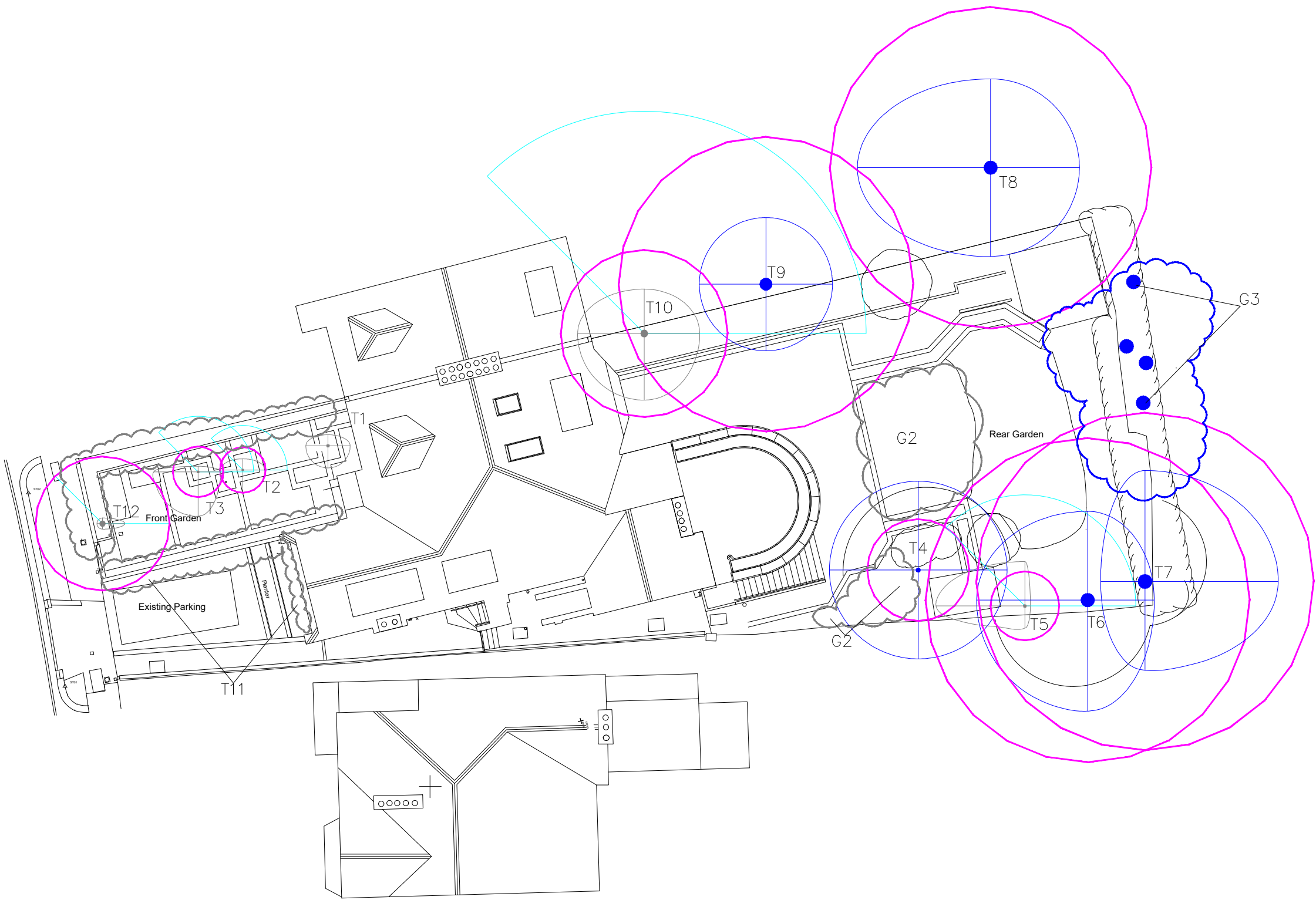
BS CAT C



ROOT PROTECTION
AREA (RPA)



TRUNK DIAMETER



DRAWING TITLE

TREE CONSTRAINTS PLAN
PROPOSED SITE

PROJECT

41 HOLLYCROFT AVENUE

CLIENT

EVELYN PETERS
& DINO PAPARELLI

SCALE 1:200@A3

DATE OF ISSUE MARCH 2025

SURVEYOR GMC DATE 14/3/2025

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No.	DATE	REVISION



BS CAT C



TRUNK DIAMETER



PROTECTIVE FENCE

DRAWING TITLE
TREE PROTECTION PLAN
PROPOSED SITE

CLIENT
EVELYN PETERS
& DINO PAPARELLI

[illegible]