

Tree Survey
& Arboricultural
Report

for:

28 Park Village East
Camden
London
NW1

Produced for:

Bruges Tozer Architects

Prepared by:

Hal Appleyard

Dip. Arb. (RFS)., F. Arbor A.

Date: 4th November 2004

Reference: ha/rpt1/28pve

CONSULTING

URBAN & FURAL

TREEWANAGEMENT

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1.0 Instructions and Scope

- I have been instructed by the clients of Bruge Tozer Architects to assess the trees plotted on the survey plan in the areas of the proposed development. My survey has been prepared upon the guidance provided in accordance with the principles of BS 5837:1991 'Guide for trees in relation to construction'.
- 1.2 I am to prepare my report in a format that can be submitted to the Local Planning Authority to accompany a planning application. As such all the trees within and those of significance which are adjacent to the site have been listed within a Tree Survey
- 1.3 The design layout proposed has been developed following consultation with us, the design requirements of the project and with cognisance of the surrounding features and environment.

2.0 Tree Survey

- I have visually inspected those trees identified on the site survey plan provided by the architects. Each tree has been assessed from ground level only and no aerial inspection has been made, nor has any decay detection equipment been used. The Tree Survey Plan (Appendix 2) identifies those trees which are in the vicinity of the proposed development area.
- The trees have been detailed in the Tree Survey Schedule at Appendix 1 to include their identification number, which corresponds to their position on the site, species (English name), an estimated height, a measured trunk diameter at 1.5m above ground level, an average measurement of the canopy radius spread (an aspect initial is included where the canopy is asymmetrical in that direction), the tree's vitality or vigour, an assessment of the tree's maturity, the potential for the tree to increase in height and spread in conjunction with an estimate of the life expectancy, a quality grading in accordance with the guidance set out in BS 5837:1991 'Guide for trees in relation to construction', the minimum protection distance of each healthy living tree which is derived from Table 1 of the British Standard and some relevant comments regarding each tree where appropriate.
- I inspected the trees on 5th July 2004 and include 6 records. Where trees appear not to be present on site, a note has been made. They are described in the text. Explanatory notes to the Schedule are included in **Appendix 1**.



- I include a section of the BS 5837:1991 'Guide for trees in relation to construction' in relation to the tree survey grading system and Table 1 which relates to the minimum protection distances, within which no construction should take place that might affect the trees(Appendix 3).
- I draw attention to the facility within BS 5837:1991 'Guide for trees in relation to construction' for a reduction in the minimum protection distance of one third on one side only where considered acceptable and where a corresponding increase in rooting area is provided on all other sides.
- 2.6 Further notes relating to the Tree Survey are included below.

3.0 Legal Tree Protection

Trees are protected by virtue of their being within a conservation area. Any works to trees covered by either a TPO, Conservation Area status or are afforded protection by existing planning conditions will need to be approved by the Local Planning Authority prior to commencement.

4.0 General Site Description

The proposed construction area is set within the well-established grounds of a substantial Georgian mansion house. The construction area currently comprises a double garage, with hard standing leading to the pavement of Park Village East. The land dips to the west, (from front to rear). The garden supports a range of young, middle-aged and mature trees. A healthy bank of vegetation occurs at the front bordering the road and access drive. Deeper within the site trees offer maturity and depth.

5.0 Tree Appraisal

- The tree details are provided in **Appendix 1**. Beyond that, the trees of significance to the visual appearance of this part of the conservation area are the frontage Horse Chestnut and Lime trees and some of those set deeper into the site when it is viewed from Park Village East.
- The Horse Chestnut No 1 is a useful screen tree and contributes effectively to the street scene also. It has a low south-growing branch and a dense canopy. Pruning the tree to reduce the density and removing dead branches and stubs would be prudent as part of normal tree husbandry.



- The Pear to the rear of the existing garage has been quite severely pruned in the past and large decaying wounds together with some die-back occur in the canopy. Decay has developed within a wound at the southern side of the trunk base. The tree leans to the north and stress will be placed on the area of trunk, just above the roots, where decay has developed. This will increase the chance of breakage at this point in heavy winds for example. There is a mature climbing rose growing through the canopy which gives the tree a greater volume than actually exists.
- The Common Ash No 3 grows in neighbouring land to the south. It has an open canopy which appears to have been pruned to reduce density in the past. The branches spread quite extensively and appear somewhat drawn, and end-heavy. Pruning to reduce the overhang and produce a more compact canopy would be appropriate tree management.
- A further Pear No 4 is a typical example of the species. It has an even conical form, with only minor dead wood. It appears to have been well maintained in the past, which has contributed to its effect in the inner part of the site.
- A mature Sycamore No 5, has a dense covering of ornamental ivy which extends to approximately 13m in height. The condition of the trunk could not be assessed in detail, though the canopy appeared stressed and sparse.
- The current owners have planted a Quince, which appears to have established well. This is a medium-sized tree well suited to its location.
- In summary the site is well treed with a variety of species, sizes and ages. The contribution of the trees to the conservation area varies from significant to low. However, the presence of trees in this part of the conservation area, play an important role in the appearance and general character of the area.

6.0 Proposed Development and Trees

- The proposed construction of the new garage and staff accommodation will mean the excavation for a basement level. This means that the visual impact of the new building will be largely unaltered from that which currently exists.
- 6.2 Considering the implications of the proposal on the trees can be separated into three primary areas, i) the front, ii) the rear and iii) the side (north).

- Taking the area to the front first, there is currently an area of hard standing designed for off-road parking to the front of the existing garage. A small part of this area falls within the 6m minimum protection zone of the Horse Chestnut No 1 at the front which will be lost to new construction. In relation to the tree's whole root protection zone and available rooting area, the potential extent of rooting area lost to construction is likely to be tolerated by this visually significant tree. It may become necessary to prune the very lowest branches of this tree but no more that might be appropriate irrespective of this proposal. Very limited pruning is unlikely to affect the tree's condition or appearance.
- Moving to the second area at the rear, the proposed layout will result in the removal of the Pear No 2. The tree can be seen from public vantage points on Park Village East. Its position and appearance is dominated by the Horse Chestnut No 1 and the Ash No 3. I do not believe that its removal will adversely and significantly alter the character of the conservation area. Removal of a poorly-formed specimen with defects and die back can be reasonably described in my view, as an enhancement to the area. Opportunities for new tree planting as mitigation for the tree's loss exist within the site.
- The proposed construction of the rear lightwell and garden area will mean that ground levels will be reduced in this area. Roots of the Ash No 3 (growing No 30 Park Lane East) are likely to have extended into the land of No 28. Construction therefore will need to be carried out with caution in this area. Roots, important to the tree's anchorage and condition may be encountered. Though the proposal is restricted to the reduced minimum protection zone of 4m for this tree, a method statement, controllable by condition can set out the techniques and methods of construction to minimise potential impacts on this tree. Such methods would include use of hand dig, specialist supervision, root pruning, introduction of geotextile materials, soil amelioration and root protection. In addition, it would be reasonable to prune the tree involving, light canopy reduction-via-thinning works (drop crutching), which would assist in maintaining the tree in an appropriate size and form for its location. Such work would also serve to maintain adequate anchorage following excavation works for the proposal.
- The proposed garden area, path and raised planters are proposed to be located at approximately 5m from the trunk of the Pear No 4, at the closest point. The erection of robust tree protection fencing at the position of the path (see Appendix process. Storage of materials or equipment can be restricted to areas outside the protected area surrounding this tree.



The third area, which is to the side of the proposed building, grow the Quince and the Fig. Both can be protected and preserved during construction by erecting a robust fence in the position shown on the attached Tree Survey Plan.

7.0 Conclusions

- 7.1 The proposed construction largely takes up the footprint of the existing garage. It requires the removal on one Pear tree which has a number of defects. The proposed rear garden area requires some excavation within the normal minimum protection zone of a mature Ash. Care during construction, controlled by a planning condition in conjunction with some tree management will be able to safeguard the tree's future. The remainder of the trees in proximity of the development can be protected by erecting, for the duration of the construction, a normal tree protection fence, which will exclude construction processes.
- With respect to the trees, the proposal does not require tree works or tree losses to such an extent which will adversely impact on the character and appearance of the conservation area.

8.0 Limitation

No assessment of the soils or wood tissue has been sent for laboratory analysis unless specifically stated. Our assessments are based on professional experience and expert observation at the time of the inspection. No liability can be assumed to rest with ACS Consulting should conditions alter after our inspections.

No attempt has been made us to ascertain the presence of any legal protection that might be afforded to the trees in the form of either a Tree Preservation Order of Conservation Area. Prior to the implementation of any works I strongly recommend that the Local Authority be consulted to obtain any necessary consent.

We must be informed immediately of any alterations to plans or site features upon which we have based our assessments and or advice. This may affect the report and or any recommendations.

This report has been prepared for the sole use and benefit of the client. Any liability of ACS Consulting shall not be extended to any third party.



No part of this report is to be reproduced without authorisation from ACS Consulting (London).

Hal Appleyard

4th November 2004

ACS Consulting (London)
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APPENDIX 1

TREE SURVEY SCHEDULE



SITE: 28 Park Village East, Camden

INSPECTION DATE: 5.7.04

SURVEYOR: Hal Appleyard REPORT REF: ha/ts1/28pve

			<u>, </u>	,						
Tree No.	English Name	Height (m)	DBH (cms)	Crown Spread	Vigour	Age Range	FGP	BS Cat.	Prot Zone.	Comments
:		SEE NOTE 1 BELOW	SEE NOTE 2 BELOW	(m) SEENOTE 3 BELOW	SEE NOTE 4 BELOW	SEE NOTE 5 BELOW	SEE NOTE 6 BELOW	SEE NOTE 7 BELOW	SEE NOTE 8BELOW	
1	Horse Chestnut	17	65	5	N	М	LM	В	6	Low branch growing south. Screen tree. Dense form.
2	Pear	7	39	3	N	M	LL	С	6	Decay in the south side of base, leans north. Die back apparent in north side of canopy.
3	Ash	21	65*	7	N	M	LH 	В	6	Open canopy. Spreading form. Pruned in past to reduce density. Some dead branches.
4	Pear	13	49	4	N	M 	LH	В	6	Even form, well maintained in past. Minor dead wood.
5	Sycamore	17	60*	4	N	М	LH	С	6	Dense ivy to 13m. Sparse crown.
6	Quince	5	15	2	N	Y	МН	В	2	Recently-planted garden ornamental tree

^{*}means estimated.

Notes:

- 1 Height describes the estimated height of the tree from ground level.
- 2 DBH is the diameter of the trunk at 1.5m from ground level. Some trees may be estimated.
- 3 The crown spread refers to the radius from the trunk centre and is expressed as an average of NSEW aspect. Notes are made when necessary.
- 4 Vigour is described as Normal, or Low and refers to the general condition of the tree.
- 5 Age range is represented as Y-young, MA -Middle Aged, M-mature, OM-over mature.
- Future Growth Potential describes the tree's potential to increase in size in conjunction with its estimated life expectancy and is indicated as Low, Medium or High together with Low <10yrs, Medium 10-30yrs and High >30yrs e.g. L/M. This assessment is species related.
- 7 BS Category refers to BS 5\$37 where A category is most desirable and D category is least desirable (remove).
- 8 BS5837:1991 Table 1 Protection zone, measured as a radial distance from the trunk centre. Within this area surrounding the tree, it is preferred land is to remain completely undisturbed.

NOTES TO THE TREE SURVEY SCHEDULE (descriptions refer to those details recorded. Details that are recorded may differ).

- 1. The tree number relates to the position of the tree on the site plan.
- 2. English tree names are provided. Some variations in the varieties may exist owing to identification features being available only when in leaf.
- 3. Tree height is measured from ground level to the uppermost branch tips.
- 4. DBH refers to the diameter of the trunk measured in centimetres at 1.5m from ground level.
- Crown spread is measured in metres and represents an average radius spread.
 Notes are made where significant asymmetry occurs.
- Age denotes the trees relative maturity in accordance with the guidance set out in BS 5837:1991 'Guide for trees in relation to construction'
- 7. Future Growth Potential describes the trees capacity to increase in size (Low, Medium and High) relative to its current dimension in conjunction with an estimated life expectancy (also Low, Medium and High) e.g. L/H where:

increase in overall size is measured in factors of <0.5 – L, 0.5-1.0 – M and >1.0 – H and the life expectancy is regarded as up to 10 years – L, 10-30 years – M and > 30 years – H.

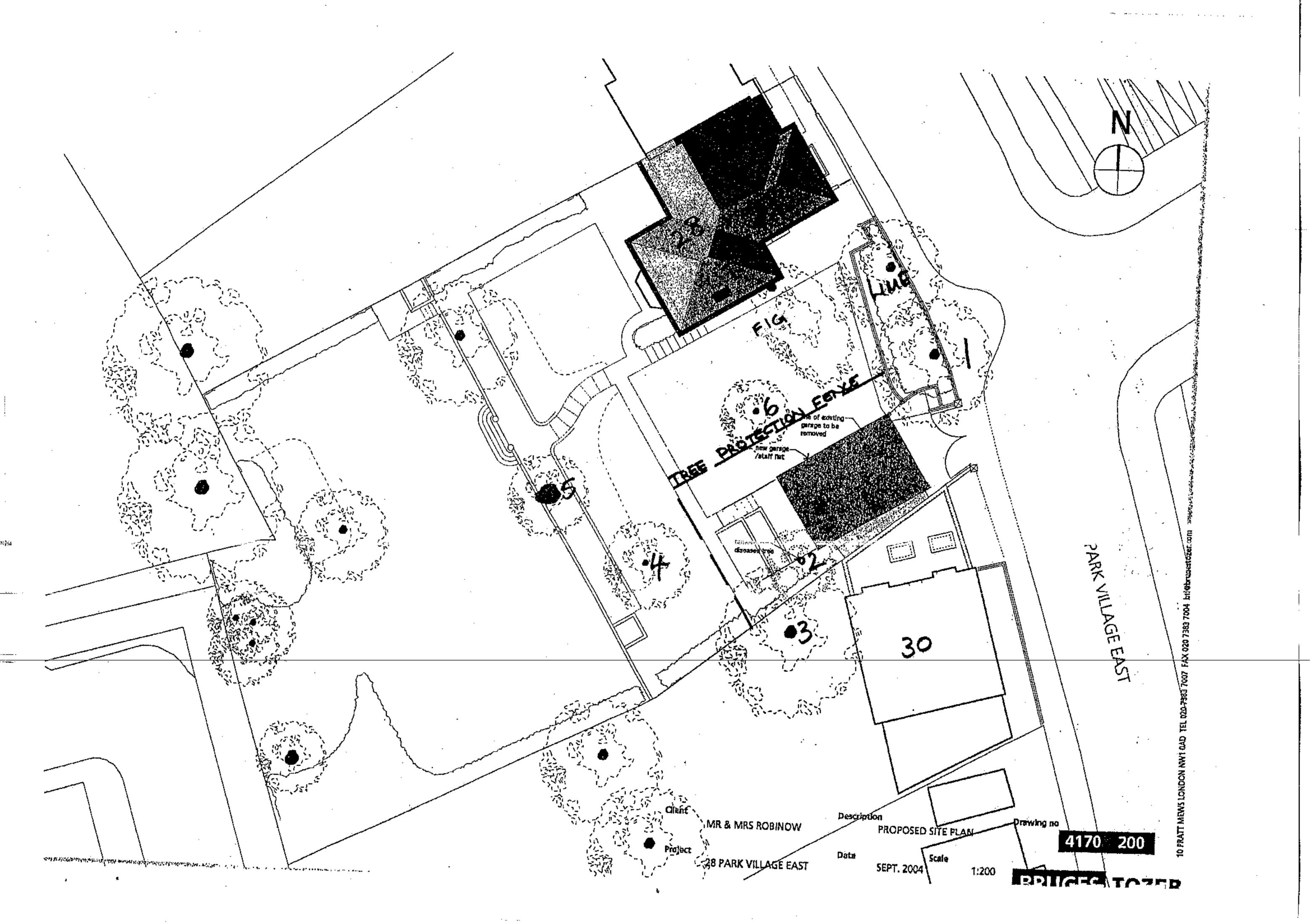
- The quality of the tree is graded in accordance with the guidance in BS 5837:1991 'Guide for trees in relation to construction'. 'A' grade trees are exceptionally fine quality trees, 'B' grade trees are those which a good specimens with only minor defects, 'C' grade trees are those which are of lesser quality and amenity contribution which could be removed and 'D' grade trees are those that are dead, dying or dangerous or those that should be removed for sound arporicultural management reasons.
- 9. The vigour or condition of the tree is described as being either: Normal, (N), Low (L) or Dead (D). The condition is an assessment of the tree's vigour and vitality.
- 10. Protective Distance is the minimum distance of land measured from the trunk centre that should be maintained entirely undisturbed by construction works. The

distance is taken from Table I of BS 5837:1991 'Guide for trees in relation to construction'. A facility to reduce the calculated distance by one third exists where it is considered acceptable to the long term health of the tree and that an increase in available rooting area is provided on all other sides.

- 11. The Comments and Observations or Significant Defects are any arboricultural observations of defects that may have an impact on the tree's current or future condition.
- 12. Where many young or closely-grouped trees of the same species exist, one identification number may be attributed. An average of measurement of the dimensions is provided and the BS grading applies to the group rather than individual specimens.

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APPENDIX 2



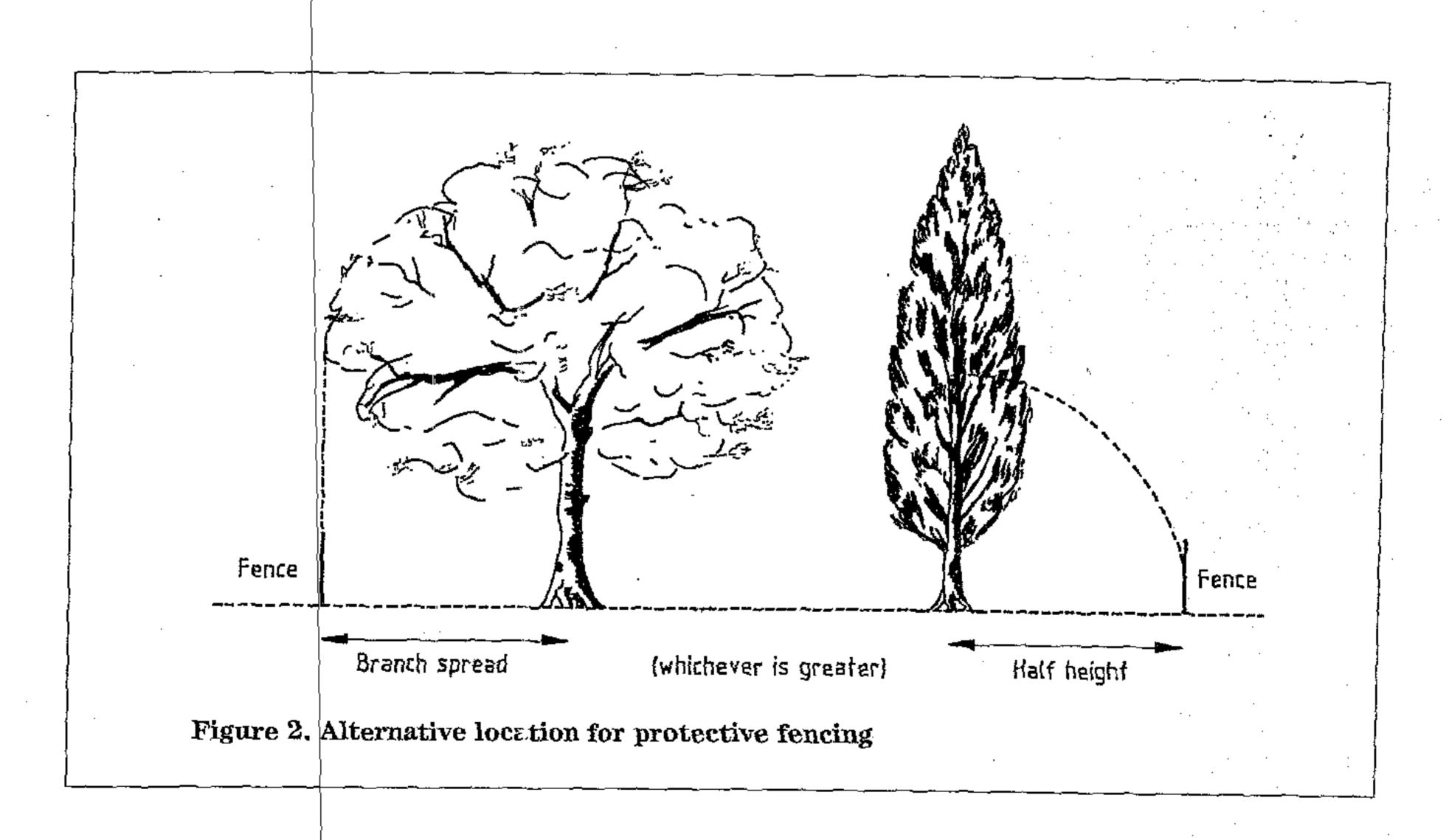
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APPENDIX 3

Tree age	Tree vigour	Trunk diameter	Minimum distance
Young trees (age less than 1/2 life expectancy)	Normal vigour	mm < 200 200 to 400 > 400	m 2.0 3.0 4.0
Young trees	Low vigour	<pre> < 200</pre>	3.0 4.5 6.0
Middle age trees (1/3 to 2/3 life expectancy)	Normal vigour	 < 250 < 250 to 500 < 500 	3.0 4.5 6.0
Middle age trees	Low vigour	< 250 250 to 500 > 500	5.0 7.5 10.0
Mature trees	Normal vigour	< 350 350 to 750 > 750	4.0 6.0 8.0
Mature trees and overmature trees	Low vigour	<pre></pre>	6.0 9.0 12.0

NOTE 1. It should be emphasized that this table relates to distances from centre of tree to protective fencing. Other considerations, particularly the need to provide adequate space around the tree including allowances for future growth (see 6.3), and also working space (see 6.7), will usually indicate that structures should be further away.

NOTE 2. With appropriate precautions, temporary site works can occur within the protected area, e.g. for access or scaffolding (see 8.3).



damage to the property of a third party. For instance, root activity can affect other buildings or structures (see clause 10). The crowns, stems and roots of trees may have structural weaknesses which in falling could cause damage to property or injury to people. Leaves and fruit falling from trees, obstruction of light and problems of poisonous plants have all been considered by the courts. Legal advice should be sought when trees may become a problem.

4.5.2 Careful planning and design should minimize the possibility of litigation after completion of the development.

5 Pre-planning site assessment

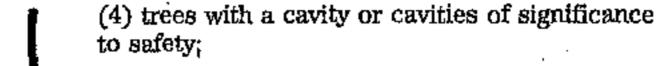
5.1 Land survey

- 5.1.1 A land survey should be made showing all relevant existing site features. This survey should be made available both to developers and to the Local Authority before any application for planning permission is submitted.
- 5.1.2 Before commencing this land survey, expert advice should be sought from a person experienced in arboriculture to identify all trees which are relevant for inclusion in the survey. In most circumstances, this will include all trees over 75 mm stem diameter, measured at 1.5 m above ground level. In addition, smaller specimens should be noted wherever these are of particular interest or potential value. In some circumstances, it may be appropriate to exclude larger trees where these are clearly of no potential amenity value (for instance, in woodlands, trees which are likely to be thinned during routine management).
- 5.1.3 Trees should be numbered for identification on site with small durable metal or plastic tags. Tags should be placed as high as conveniently possible, and should be attached in such a manner that allows for the growth of the tree. Provided vandalism is not a risk, a band of fluorescent tape can be tied around the tree to aid identification for the land surveyor.
- 5.1.4 Other arboricultural features such as large masses of shrubs or hedges should also be identified. The position of stumps should be noted, so that provision can be made for their removal, if appropriate, and so that areas of possible future soil heave may be identified.
- 5.1.5 The land survey should include:
- (a) location and identification number of all trees, shrub masses, etc., as identified in 5.1.2, 5.1.3 and 5.1.4;
- (b) other relevant features, such as streams, old buildings and active services;
- (c) spot heights of ground level throughout the development site, as a basis for avoiding changes in soil level around retained trees;
- (d) approximate location of trees on land adjacent to the development site, that might be of relevance

to the development or might be useful as part of the overall landscape effect of the area.

5.2 Tree survey

- 5.2.1 The species and condition of all trees included in the land survey (see 5.1.2, 5.1.3 and 5.1.4) should be assessed by a person experienced in arboriculture. In making this assessment, particular consideration should be given to:
 - (a) the health, vigour, and condition of each tree;
- (b) any structural defects in each tree, and its life expectancy;
- (c) the size and form of each tree, and its suitability within the context of the proposed site development;
- (d) the location of each tree relative to existing site features, e.g. its value as a screen or as a skyline feature.
- 5.2.2 On the basis of this assessment, trees should be divided into one of the following categories, differentiated on plans by cross hatching or by colour (suggested colours are indicated):
- (a) trees whose retention is most desirable: high category (green)
 - (1) vigorous healthy trees, of good form, and in harmony with proposed space and structures;
 - (2) healthy young trees of good form, potentially in harmony with proposed development;
- (3) trees for screening or softening the effect of existing structures in the near vicinity, or of particular visual importance to the locality;
- (4) trees of particular historical, commemorative or other value, or good specimens of rare or unusual species;
- (b) trees where retention is desirable: moderate category (blue)
- (1) trees that might be included in the high category, but because of their numbers or slightly impaired condition, are downgraded in favour of the best individuals;
- (2) immature trees, with potential to develop into the high category;
- (c) trees which could be retained; low category (brown)
- (1) trees in adequate condition, or which can be retained with minimal tree surgery, but are not worthy for inclusion in the high or moderate categories;
- (2) immature trees, or trees of no particular merit;
- (d) trees for removal: fell category (red);
- (I) dead or structurally dangerous trees;
- (2) trees with insecure roothold;
- (3) trees with significant fungal decay at base or on main bole;



- (5) trees that will become dangerous after removal of other trees for the reasons given in items 1 to 4.
- 5.2.3 A schedule to the survey should list all the trees, providing details of species, height and trunk diameter at 1.5 m above ground level, the category, age and vigour of the trees, as a basis for the use of table 1. Branch spread should be assessed; this is often most readily shown on the tree survey plan by defining the actual branch spread rather than illustrative circles. The schedule should also include other relevant details such as trunk lean, significant defects and appropriate remedial work, and whether a tree is included in a Tree Preservation Order. See also BS 1192: Part 4.
- 5.2.4 Attention should be drawn to groups of trees which are well suited for retention, particularly if these contain a variety of species and age classes which could aid long-term management. It may be appropriate to assess the category of such trees as an overall group, rather than as individuals.

6 Planning

6.1 Introduction

- **6.1.1** With careful planning, trees can enhance a development. However, they can occupy a substantial part of a site, and when mature, the height or branch spread of many tree species can be in excess of 20 m, so that they dominate low-rise buildings.
- 6.1.2 Planning is needed from the initial stages of development until all work is completed. Thereafter, continued attention will be needed as part of the long-term management of the tree resource.
- 6.1.3 Trees can impinge on many aspects of site development, and can involve all members of a multi-disciplinary development team. Adequate consideration should be given to the requirements of trees by all members of the team throughout the development process.
- **6.1.4** Trees on adjacent properties will need consideration.
- 6.1.5 Even if there are no trees on the site, planning for future planting may still be needed.

6.2 Selection of trees for retention

- 6.2.1 A tree survey (see 5.2) provides the basis for deciding which trees might be suitable for retention. Within the limitations imposed by the many other constraints described in 6.2.2 to 6.2.6, preference should be given to retaining the high and moderate category trees. Low category trees will usually only be retained where they are not a significant constraint on development.
- **6.2.2** The retention of trees is only one facet of planning a new development. The type of development may be determined by land use specified in local plans;

the number and size of trees which can reasonably be retained within a development may be influenced by land use or planning policies.

- 6.2.3 It is essential, when selecting trees, to ensure that it is practical to make provision to protect the trees physically during development so as to avoid damage to the trees by construction work. This will involve identifying an area around the tree which should remain undisturbed (see 7.5), and ensuring that it is feasible to maintain fencing undisturbed around all such areas throughout the construction period (see clause 8).
- 6.2.4 Care should be exercised over misplaced tree preservation. Attempts to retain too many or unsuitable trees on a site are liable to result in excessive pressure on the trees during development work and subsequent demands for their removal. The end result is usually fewer and less suitable trees than would be the case if proper planning, selection and conservation had been applied from the outset.
- 6.2.5 Particular caution is needed over retention of large old trees which become enclosed in the new development. Such trees may be less resilient and more likely to die as a result of the development, and even if they survive in the short term, they may die long before the new buildings are obsolete and in this situation, the felling and disposal of trees can be very difficult and extremely costly.
- 6.2.6 Although existing trees should be retained wherever reasonable, unless such trees are well suited for incorporating within the new development, it may be preferable to favour new planting. New plantings can then be selected which are ideal for the situation and landscape (see clause 14).

6.3 Proximity of trees to structures

- 6.3.1 The physical size of a tree can dominate a building. This can give rise to concern about the tree's safety, can cause unreasonable obstruction of light and views, and provoke objections about leaves or other falling debris. These factors are often the most significant when considering the juxtaposition of trees and buildings, and can only be satisfactorily resolved by ensuring that the trees have adequate space including allowance for future growth. It is necessary to consider the requirements of future tree planting, as well as existing trees.
- 6.3.2 The sheer size of the tree, particularly when it is moving in strong winds, can cause apprehension to occupants of buildings. For this reason, when locating buildings, the ultimate height, weight and branch spread of a tree, the aspect relative to strong winds, and the changes in exposure, all need consideration. The mature size of any individual tree species will be influenced by its growing conditions and expert assessment may be needed.
- 6.3.3 Excessive shading by trees should be avoided. This will depend on the aspect of the tree from the building, the proximity of windows, particularly of



28 PARK VILLAGE EAST LONDON NW1 7PZ

A BRIEF ACCOUNT IN SUPPORT OF A PROPOSAL TO REPLACE AN EXISTING DETACHED GARAGE WITH A NEW STRUCTURE CONTAINING A GARAGE AND STAFF ACCOMMODATION

PURPOSE

This document briefly describes the steps taken since accepting the client brief, through the processes of design, consultation and design reviews to making applications for listed building consent and planning approval for the removal of an existing detached garage and its replacement with a new small building incorporating a garage and a staff flat

The significance of the site historically and architecturally is also outlined below

BACKGROUND

John Nash and his step-son, James Pennethorne, built Park Village East and Park Village West from 1824 onwards. These park villages were originally separated by a branch of the Regent's Canal, now filled in. Park Village West is a picturesque, winding 'country' road, whilst Park Village East is linear. The villas on the east side of Park Village East were demolished around 1906 to make way for a wider railway cutting. Many of the villas have had their interiors altered but the mixture of romantic, classical, Tudor and Italianate exteriors remains

With these 'twin' developments, intended for the middle classes, Nash established a model for the suburban Victorian villa, with a stylistic variety much imitated by Victorian suburban builders

The building was listed grade II* on 14th May 1974

PROPOSAL

28 Park Village East is a Crown Estate residential property, occupied under a long lease by Mr and Mrs Robinow. Bruges Tozer Ltd has been appointed as architect for the proposal. The scheme submitted for listed building consent and planning approval is the result of a process including consultations with Development Control at the London Borough of Camden and the Camden Area Advisory Committee

Mr and Mrs Robinow have been a very important part of the decision making processes leading to the current proposal, particularly with regard to the impact on their garden, and again, the proposal takes account of their concerns. Also, in view of the proximity and importance of a variety of nearby trees, a report has been commissioned from a registered arboricultural consultant

The resultant structure is the same height as the existing garage as viewed from Park Village East, and only slightly wider. The architectural concept is for a design which, whilst fulfilling the occupational brief, results in a building which is supordinate to the other buildings and is modest, not standing out or making a show of itself in any way

As well as for the public front facing Park Village East, careful consideration has been given to the potential impact as viewed from the rear, from the garden of number 28, and obliquely from the garden of number 30, and the resultant disposition takes account of these considerations

The building has been designed to sit comfortably within the overall context and variety of styles referred to above

CONSERVATION POLICIES

PPG 15 states 'Many listed buildings can sustain some degree of sensitive alteration or extension to accommodate continuing.....uses.....and the merit of some new alterations or additions, especially where they are generated within a secure and long-term ownership, should not be discounted

25 October 2004 wh/4178