

**Response of Adam Hollis, Landmark Trees, 11th September 2017 to
Karen Beare - Consultation comments of 6th September 2017.**

Summary

This note has been prepared in response to concerns raised by neighbouring residents. It is the intention of the applicants, Mr and Mrs Lewis to ensure that the lane and trees that add value to the character of the site and surrounding area are protected. The comments have carefully been reviewed and this document responds to the points raised in the letter of objection. On the matter of consistency between documents / disciplines, it should be noted that the CMP and arboricultural reports are not inconsistent, the documents should not be read in isolation, rather as a whole. The CMP has been informed by the arboricultural reports. The CMP document was produced more recently following the appointment of 800 Group and as such reflects the most up to date information in terms construction management. It is our view that the arboricultural reports accurately reflect the information in relation to trees on site and along Millfield Lane.

Table 1: Summary of Key Objections and Responses.

Paragraph(s)	Objection	Response
xii, xxii & Conclusion	CoL's CBR 2-3% values rule out use of 3D web for ground support in Millfield Lane	Web functions perfectly well to values as low as 1%.
vii, xii, xiv & Conclusion	Roots 150mm below lane surface rule out excavation for web	Only CoL wishes / needs to create a permanent refurbishment with partially or fully bedded web. Roots <i>per se</i> would not rule this out, but rather constrain the final design.
vii, xii, xiv, xxii & Conclusion	Trees will be left without ground protection along lane if CoL's plan abandoned	Temporary protection for development only requires surface laying / charge of web, plates or stone. Detail tbc.
xv	Trial pits on site were deliberately dug in autumn when roots are suppressed / would not show up	It is a popular myth, but untrue that roots are dormant throughout the winter. The protected root system would be visible throughout the year.
viii & xx	Drainage should be routed out of T5 veteran oak & other RPA	T5's RPA effectively covers the whole front garden, where some drainage is necessary. NJUG guidance is to be followed
i- xxv & Conclusion	There are inaccuracies and inconsistencies throughout LT reports.	Those cited are shown to be unfounded, arising from too casual a reading of the text.

Response

i. The Arboricultural Method Statement (AMS) is not simply *tagged onto* the Arboricultural Impact Assessment (AIA), but freestanding. As per BS5837, Table B.1 *Delivery of tree-related information into the planning system*, the AMS was submitted as Additional Information to the AIA, including an extended survey of the construction access route, outside the application site, at the special request of FPRA. Prior to submission, it was agreed with LB Camden that this extra survey should be more appropriately included in the AMS with tree-related construction details to which it pertained. NB Table B.1 only requires submission to planning of an Outline AMS – *heads of terms*, with details commonly left to Reserved Matters / Planning Conditions. The standard recognizes that some detail will still be outstanding / still evolving at this stage, rather than reports being incomplete. Our AMS goes significantly over and above such heads of terms and our extended tree survey over and above standard BS requirements.

Thus, British Standards protocol was not only followed on this occasion, but also confirmed in advance with the planning authority, given the unusual request of the FPRA for an extended survey. The standard accepts within its terms of reference (*Use of This Document*) that it is open to interpretation and should not be quoted by rote. It is helpful therefore that we agreed our approach with the local authority prior to submission. It is understandable that residents and their advisors may have a different interpretation of the document to Landmark Trees (LT) and London Borough of Camden (LBC) after the event, but it is wrong to assume that we should share her / their singular interpretation.

ii. The >20% figure mistaken by neighboring residents as T15's impact, is in fact a gross working total for the area of RPA affected (as clearly labeled in Table 1), regardless of whether it already contains built form / disturbed ground / concrete foundations etc. This is taking this total out of context and reading it as the headline figure - putting two and two together and making five: firstly, the gross area affected is mostly already covered by existing built form, the applicant is demolishing and rebuilding, not building afresh; the net area of increment is 4.9m² / 5.35% of RPA, significantly <20%; the proposal is for a garden building of low-invasive foundation design (discontinuous footing with suspended slab), which again would have a net

disturbance of a fraction of its footprint (the footings rather than slab itself). Thus, the net impact is not >20%, but a fraction of a fraction of it.

iii. Paragraph 2.3.1 is self-explanatory preamble defining the scope of the survey with reference to the standard. It also provides information on the additional survey at the request of the FRPA, over and above those requirements, and an indication of where that survey information will be provided.

iv. Again, the unnecessarily loaded term 'admit' is applied to generic preamble that merely sets out the scope of the survey. The issue referenced with services that would generally be considered in detail as Reserved Matters / under Condition. The scope of a Tree Constraints Survey (BS5837 4.4.1), is for the surveyor is unaware of any proposals at the time of survey, let alone the finer points of service routes (*4.4.1.1: the tree survey should be completed and made available to designers prior to and/or independently of any specific proposals for development*).

v. The report does in fact take into consideration the potential for soil compaction in clay soils and in relation to RPA impacts; e.g. 6.3.1 *All plant and vehicles engaged in demolition works should either operate outside the RPA, or should run on a temporary surface designed to protect the underlying soil structure*; and 6.3.3: *The paving encroachments will require a no-dig construction technique, e.g. using a cellular confinement system with no fines aggregate for the sub-base*. As discussed above, careful reading of the text would avoid such unfounded objections, and call on the applicant and planner's time. The above statements on compaction are not buried in the text but headline key paragraphs.

vi. There is a recent TPO on the veteran oak tree. However, in terms of the Site Description (this section of the report), there are no Area / Group TPO's or Conservation Areas affecting the status of the site as a whole.

vii. I believe the discrepancy here between our c.200mm and the residents' 150mm is their reading off the Summary text of the Tree Radar report and LT analyzing the raw data: if you look at the graphs produced further within that report, you will soon see the first horizontal

datum in the images is set at 20cm below ground, with readings appearing either side of this line (c.200mm). Generally speaking, the Low Relative Density Rooting occurs above this 20cm line and the High Relative Density Rooting below. It is this density of rooting that matters most.

However, it is an academic point; it would not have a significant material impact on the proposal in planning terms (to argue over 50mm and whether c.200mm even encompasses 150mm), and not an error, significant or otherwise: in the first instance, the objection sets too much store by the accuracy of the radar - as with many of my peers, I stopped using the gadget for normal planning purposes some 10 years or more ago, due to embarrassment over discrepancies between the model and reality; in the second instance, it is not of necessity to excavate the lane to the requisite depth of web, but rather, as per 2.3.2 of our AMS, *It is proposed to provide protection from construction traffic to the trees along Millfield Lane by installing a 3-D cellular confinement system on top of the existing surface.*

A wider point here though is the very justification for the no-dig construction: my understanding is that installation of a more permanent road refurbishment with web sub-base would be primarily at the request of the City of London (CoL) to assist them in their plans for the future of the road and heath. It would certainly then help with the finished levels if some of the existing wearing course could be removed and the web (wholly or partly dug in), but that is a separate matter of detail to be entered into with CoL (or not). In such instances, I don't believe anyone would rely upon radar models alone to determine the actual limits of excavation. In all events, development would not require a permanent solution, but only temporary ground protection. Given the lighter densities of much of the proposed construction traffic, my understanding is that the applicant would only require such temporary measures for a relatively short period, and the existing road surface may indeed be fit for purpose with reactive repair / temporary augmentation, subject to further testing / as a matter of detail.

viii. I believe it is fair comment that the design team has taken on board the concerns regarding the veteran status of T5 and has sought to reduce impacts. That the impacts on T5 in the current scheme are reduced in comparison to the previous refused scheme is a matter of fact. The presence of impacts per se does not alter the facts. Nor are these impacts 'discovered' as if concealed, but presented openly and honestly to planning in Table 1 and throughout the text.

The requirement to run services through RPA is not new to this scheme and was discussed extensively in the previous application. However, the tree's RPA effectively covers the whole front garden (lawn and border) and the site drains to the front boundary. I expect it would be rather difficult to install the requisite site drainage without some activity within the RPA. Again, I suspect the objection misses the nuance here – it is all too easy to misconstrue RPA as *sanctuaries*, rather than *constraints*. The presence of the RPA constrains activities, but does not prevent them. As per BS5837, 5.1.1 *The constraints imposed by trees, both above and below ground (see Note to 5.2.1) should inform the site layout design, although it is recognized that the competing needs of development mean that trees are only one factor requiring consideration.* Consideration of T5's RPA has informed the design team's deliberations, where they have worked to reduce the necessary drainage footprint as far as possible.

In terms of the protection of the veteran tree T5 on this site, the question whether the multiplier for the Root Protection Area (RPA) for veteran trees should be extended indefinitely to an aspirational $\pi \times 15$ stem diameter (recommended by the FC as statutory consultee in 2008) or capped at the 15m limit, adopted by the industry standard (BS5837) in 2015, is open to question. In my experience, increasing the RPA of a tree does not of necessity increase the impact rating to that tree, as the RPA as a whole may increase more (in all directions) than the proportional construction encroachment; i.e. a development impact expressed as a percentage may actually diminish within an increased RPA. Indeed, that would likely be the case with the drainage footprint.

It is also worth pointing out that impacts may be positive as well as negative, in replacing old structures with new: the resurfacing of the drive and other areas may present opportunities to increase long-term permeability to roots below (for oxygen and water supply) and the discrete extension of such treatments over soft ground may even provide greater protection to trees in the long run. Recent articles in the International Journal of Arboriculture have questioned the view that retaining grass / soft landscaping around a tree is always the best option: lawns are easily compacted by even low-key pedestrian use and grass may outcompete tree roots in the topsoil.

ix. I do not recognize the expression 'active honey fungus' and do not use it in my report. The

actual reference in our further investigation report is: *Although not currently visible, fungal brackets of Armillaria mellea have been reported at the base.* The report also describes there being *deadwood throughout the crown.* I do not see that either statement precludes the tree from having moderate vigour or that this conjunction of qualities is particularly 'interesting'. It is perfectly natural. Put simply, the tree is a relatively resilient specimen with a generally terminal condition that it is currently managing to hold it in check. That said, the amount of deadwood is steadily increasing.

The residents question why the tree's vulnerability to development is not highlighted in the Summary. The reasons are threefold: i) trees' vulnerabilities to development are considered specifically in Table 1 within the individual impact assessments, not the global Summary; ii) as a tree with a *serious, irremediable, structural defect, showing signs of significant, immediate, and irreversible overall decline, infected with a pathogen of significance to the health and/or safety of other trees nearby,* it is not strictly a material planning constraint on development and might be disregarded from the planning process. One could argue that's its resilience suggests it is not in '*immediate*' danger of loss, as we have done in giving it the benefit of the doubt and upgrading its status to Category C (10-20 years life expectancy), but that still does not raise its status much as a material planning constraint – the guidance here is clearly that you should not generally design a layout around a diseased tree. The recording of the tree's resilience to development as *Moderate*, seems consistent though with the upgrade to Category C and record of moderate vigour; iii) the tree is unaffected by the main build, merely the garden outbuilding and associated servicing, which should not affect it significantly. Neighbouring concern here may be following the misreading of the data as discussed for the birch (T15) at paragraph ii above.

The lesser tolerance of birch trees to root disturbance is again recorded for all to see in Table 1. The recording of these species tolerances against impacts is a regular feature of our reports, not one I have seen used systematically in others (and I have worked as a Tree Officer under contract reviewing reports from many consultants). Thus, it is a strange criticism of the one consultant who does explore this aspect of arboriculture with due rigour. Essentially, it is a critique of the format rather than content of our report, and one that is only possible because we provide the information (on species tolerance) in the first place. In fact, the actual species

tolerance for birch given in the references is *Moderate-Poor*. We have shorthanded the reference to *Poor*, erring on the side of caution.

It is perhaps worth putting these Species Tolerance categories in context, as they are all relative, rather than absolute. If birch are considered to have a *Moderate-Poor* tolerance to development, beech are considered to have a *Poor* tolerance; i.e. be more sensitive. I mentioned above that I have worked as a Tree Officer under contract. I worked for South Bucks District Council in the home county named after the beech tree (old English). The fact that this *sensitive* species dominated the local tree resource did not prevent ongoing development or specifically, construction within many RPA; it was merely a constraint, a factor to consider rather than a decree of prohibition. I for one am not unduly concerned about the more resilient birch tolerating a lighter touch proposal.

x. I don't think it extraordinary to use the previous planning application as a benchmark: although the scheme was ultimately refused on construction access issues, the Tree Officer, James Remington, was essentially satisfied with the previous scheme. He had some ongoing reservations for want of further information on drainage / services in T5's RPA, but was generally of the view that the arboricultural impacts proposed to this tree and others were overall acceptable, following our lengthy discussions on the matter. With the applicant failing to provide that further level of detail, he had no choice but to recommend the refusal. Thus, it seems wholly prudent not to reinvent the wheel, but look for comparison to a scheme that was all but recommended for approval by the previous tree officer. And in that case, the substantial reduction in scale and impact of the current scheme should recommend it all the more.

xi Our opinions are misunderstood: we do not state at 6.1.7 that *any services within the RPA of a retained tree will not affect the sustainability of the affected tree(s)* but rather, *Provided that any services within the RPA of a retained tree are installed in line with the provisions of NJUG Vol.4 and BS5837: 2012, they will not affect the sustainability of the affected tree(s)*. In my view, that is quite a significant misrepresentation.

The above statement in the AIA is merely an advisory provision that industry guidelines should be followed. The statement is made in June without confirmation of the evolving service

provisions. The AMS recognition of the service requirements is made in July with further knowledge of detail, and recommends those guidelines be followed as previously stated to minimize impact. I see no inconsistency in this evolution of ongoing advice.

xii I don't believe it is unprofessional to state that the issues of protecting Millfield Lane and surrounding vegetation have been largely addressed by scaling down the project. On the contrary, the scaling down of construction is the key issue here to protecting the lane and surrounding vegetation without requiring lengthy protection measures unwelcomed by residents. I think this is a matter of fact, rather than a question of professionalism. We are of course repeating the advice that we have received from other professionals in the design team: it may be that the light construction traffic envisaged for most of the project will require little in the way of special measures at all or for a limited window only (for concrete delivery). As stated, adoption of over-and-above, permanent no-dig measures would be largely to accommodate CoL in their wider objectives for the lane.

xii. Again, the objection misrepresents our opinions by selectively quoting the text: we do not "*categorically*" (i.e. unambiguously explicit and direct) state at 6.1.11 that *the trees in question are healthy specimens of species with good resistance to development impacts and quite capable of tolerating these low impacts*. The objection italicises this statement as if quoting me directly, but rather we conclude that *the species affected are generally tolerant of root disturbance / crown reduction and the retained trees are generally in good health (including T5 veteran oak) and capable of sustaining these reduced impacts*. Our statement gives a more qualified assurance that in general the tree resource is robust. Such a statement is not incommensurate with there being individuals of lesser vigour within it, for it is drawing an overall conclusion at the end of a detailed report. I do not think such qualified assurances are out of place in a Conclusion. I would suggest they are a common feature of report and essay writing, and that we would in fact struggle to find meaning in life if we did not draw some general conclusions, and in that sense, they form the very essence of meaning.

Again, I do not recognize the term *severe honey fungus* as my own, rather just honey fungus (see paragraph ix above). The recommendation to fell the tree was based upon a lack of resources to expend on further investigating the seat of decay or monitoring the tree's health.

Under the circumstances, I stand by the decision to recommend felling as the prudent option: to knowingly leave an untested and unmonitored diseased and potentially hazardous tree in place on a property boundary would have been tantamount to negligence. The removal of this tree was not of vital import to the applicant or strictly relevant to planning: the LBC tree officer was content that the tree was not at risk from development.

It is stated *the health of the T5 Oak is an ongoing cause for concern*. However, the oak has now been inspected by James Remington, formerly of LBC, David Humphries and Jonathan Meares of the City of London and Andrew Deare and me for Landmark Trees, and found by all to be in good health. Our most recent assessment (KE/WHS/PCS/01a) was, *The crown appears in good health, with some minor deadwood*. Thus, five experts disagree with the residents' statement that the health of the T5 Oak is an ongoing cause for concern. The structural integrity with health, a not unrelated but separate matter, as similarly with hornbeam T17 having honey fungus and maintaining moderate vigour at paragraph ix. However, the matter of the tree's structural integrity is also in hand, with the commission of our recent investigation.

On the basis of the above, I disagree that *The only practical mitigation to protect these trees is to re-route the drainage away from the RPAs and also reduce the hard landscaping proposals.* This sounds to me like an impractical option: the experienced design team have naturally considered all the practical options (see paragraph(s) viii above) and determined the route of least harm within them.

xiv. With regards to the issue of the radar findings and web placement. I reiterate that the issue here lies with CoL and not the applicant. The applicant does not wish to create a permanent solution to Millfield Lane's refurbishment of his own – that is COL's aspiration. If that complicates the current application then the applicant will most likely wish to withdraw involvement here. For the avoidance of further complications the applicant and his design team can confine themselves to use of temporary surface-lain ground protection / repair measures. It is understood that the idea would not be to dig through significant roots (or densities of roots) to bed in the web, but to hand-dig and achieve some accommodation within the existing wearing course, and no amount of radar modeling will prevent that from being by careful

working with what is actually discovered. The radar is only a guide, not a specification.

It has been questioned whether or not we have met with Roy Partington of Wrekin Products with regard to the specification for / suitability of the web. We have indeed done so (on 12/7/17), though Wrekin's formal involvement (if any) would be much later in the project, at the detail and / or tender stage. The principle of the product is well established (to CBR values of 1% or less and in the presence of shallow roots), and is not in doubt. Incidentally though, Mr Partington did comment informally on the suitability of the web, in that he wondered whether it was at all necessary: he thought its use here might be overkill. It is worth noting Mr Partington stands to benefit from the sale of his product, and yet he suggests we do not need it.

xv. There remains—concern about T18, which is the common beech within her curtilage: *Mr Hollis has previously stated no roots from our Beech were found within the Water House in a trial pit dug in the autumn when it is well known roots are suppressed for the winter months.* This is an extraordinary statement, which requires untangling. Although the above ground parts of a tree become dormant during winter, the root system maintains a readiness to grow independently of those aerial parts; they can and do function and grow throughout the winter, subject to soil temperatures, even when it is bitterly cold above ground. Whether or not they were actively growing in the mild autumn when the trial pit was excavated would have no bearing on their discoverability: they do not tunnel down to warmer soil in the winter, but remain in situ, commonly in the top 0.6-1m of soil.

In a trial trench one would generally be looking to assay the secondary root system, beyond the immediate root plate, which terminates some 2-3m from the base of the tree. Secondary roots are of a smaller order to the buttress roots within the root plate, and generally measure 20-50mm in diameter. Individually, their significance is limited, but collectively they form an important constitutive part of the whole, and for this reason the (BS) guidance advises digging trial trenches to a min. 700mm depth to record the presence of roots, occurring in clumps or of >25mm in diameter, to assess the degree to which this secondary root system will be compromised. 'Suppressed' or otherwise, these roots would be plainly visible in autumn, and do not disappear for the winter.

There may be some confusion over the planning significance of these larger woody roots and the subsidiary order of fine roots and microscopic root hairs, typically less than 1mm in size that die and are regenerated throughout. Without wishing to underplay the role of these perishable water-absorbing roots, they are not material planning constraints on development *per se*, they regularly die and are unlikely to show up in our photographs whether taken in Autumn, Winter, Spring or Summer. For this reason, I am surprised by the objection. Why would we wish to conceal roots that cannot be readily seen by the naked eye, that are short-lived and regularly die, and are therefore not material constraints on development? Nobody can prevent these roots from dying: it is part of the order of nature.

The substantial trial pit was not independently inspected by the LPA, but verifiably documented, photographed and reproduced in our report to planning (DPS/WHS/AIM/02) for the previous scheme. Objections suggests an irregularity here, but this is incorrect: it is common practice for the applicant's arborist alone to inspect trial pits; Local Authority Tree Officers are too stretched / busy to review every such excavation and rely on the evidence and independence of trusted consultants and their documentation. There is, after all, little benefit in going to site to view a plainly empty or perfectly full trial pit. On the other hand, Tree Officer attendance might be requested where the results are less black or white, but even then, there is no specific local authority budget I am aware of to allow for such impromptu visits. Thus, the LPA cannot be expected to inspect trial pits as a matter of course. Needless to say James Remmington did review the photographic evidence and shared our conclusions of no significant rooting on site and no likely harm to the tree. No mention was made of sub-millimetre root hairs at any of our meetings or in any telephone conversations.

NB the substantial trial pit evidence here was not presented in way of an assurance or promise, but rather in the nature of objective fact: there are no roots in the large pit opposite the tree and that was plain to see in the photographs previously submitted to planning.

xvi. Evidence of honey fungus was documented in the previous planning submission and inspected by LBC Tree Officer, James Remmington. The current investigation follows up on those observations at Mr Remmington's request to determine the structural implications for the tree, since not all honey fungus is equally pathological. The investigations did unfortunately find

a not insignificant core of decay, indicating pathological agency. The presence of deadwood has also increased in the crown since 2015. Nobody is currently suggesting the tree be felled, now that the further investigation and ongoing monitoring has been commissioned by the new applicant: the hazard is being abated through careful stewardship, including minor tree surgery works. The BS category rating of the tree has been upgraded and the proposals and design have taken the levels and RPA into consideration.

I would suggest our opinions are not that divergent, given I have accorded the tree moderate vigour. This shared apprehension does not take away from the fact I have observed more individual dead branches in the canopy. I would like to be able to say otherwise but I cannot. I disagree that this tree was growing and of a significant size to be recorded on a map in the 1800's. It is faintly possible that the tree is extraordinarily slow-growing, but I would expect a specimen of this size to be no more than 80-100 years old, and certainly not twice that at 160-200 years old.

xvii. The 25% impact has already been rebutted above. Further works implies additional pruning, but no other pruning is proposed than the lift. The work is to raise the canopy's ground clearance from 4m above ground to 5m by removing small diameter branchwood / twigs. This is exactly the sort of routine maintenance required of trees along pavements and highways that goes largely unremarked each year, and is hardly injurious. The guidance recommends avoiding lifts of >20% canopy height. This tree has a 15m high canopy and the applicant wishes to remove 1m of it ($1/15 = 6.67\%$). The works are not injurious.

Almost a dozen trees (or shrubs) are to be cut back along Milfield Lane. Again this is light pruning in the order of small-diameter branchwood material removal / trimming to achieve modest vehicle clearance heights. I see nothing intrinsically wrong or harmful in cutting back of tree and shrubs along a carriageway (or anywhere else for that matter). It may temporarily affect the ramshackle appearance of the lane, but they will soon grow back and presumably such maintenance is carried out here from time to time. Similarly, weekend visitors to the countryside are not infrequently alarmed at the site of farmers managing their hedgerows. One should be overly concerned about such things. We are currently assuming a modest vehicle clearance height of 4.5m for the access, though we have yet to receive final confirmation of

vehicle requirements. We have discussed the clearances with CoL to date, and wait further clarification from the design team.

xviii Neighboring residents state: *use of 3-D cellular confinement system to be used but no technical details have been provided with weight loading calculations.* That is correct: we recommend the web as a robust method of mitigation / ground protection, either temporarily overlain on the existing surface or, if accommodating COL's aspirations, to be embedded partly or wholly within the existing course, subject to actual depths of significant rooting. This recommendation remains subject to detail as a reserved matter / subject of condition. NB the very need for the web may be subject to further discovery / testing and choice of vehicle types. In all events, as tree professionals we would not be providing such technical details and calculations.

xix. Anomalies are referenced with 800 group's proposals and provisions for concrete deliveries, all of which are current (September 2017) and post-date our reports (June / July 2017). We will seek clarification but cannot be criticised on the basis a report issued months before these discussions. As stated above, the purpose of an arb method statement produced ahead of planning is to state heads of terms, reserving matters of detail to condition. Increasingly, these method statements are requested ahead of planning, but prematurely in my view, due to the evolving nature of the planning and construction process. I believe my view is borne out here.

xx. Residents object that *despite assurance and recommendations in the AIA a whole new tranche of impacts are described.* As previously stated at viii. above, our recommendations that guidelines be adhered to are being followed, and use of air spades by way of mitigation is standard application of that process.

xxi Neighboring objectors state that the following two paragraphs contradict each other, but this is not the case. One paragraph refers to foundations of retaining structures and the other refers to construction of paving and hard surfaces. These are separate items with separate

construction methods. The objection presents us with a false dichotomy: it is not *Either / Or*, but two separate considerations, nor are they in conflict with one another. I reproduce the text below for convenience:

3.7.3 The path of the foundations of the retaining structures within the RPA of T18 and T23 will be manually excavated to 750mm depth (or the required footing depth, whichever is less) under arboricultural supervision.

3.8.2 The replacement paving/hard landscaping will require a no-dig construction technique, either using a cellular confinement system with no fines aggregate or building upon existing sub-base.

xxii It is suggested that the results for the CoL road surface survey, with CBR values of 2-3%, render the web proposal and / or our method statement irrelevant, because the manufacturers refer to an exclusion for very soft ground conditions with a low CBR. However, I think the objection has confused soft ground with possibly sub-optimal road conditions. My understanding is that we have never had to vary the generic web design for local conditions, and that the web works to CBR values of 1% or less. I can see no reason why it would not be appropriate for / relevant to Millfield Lane with CBR values of 2-3%. My only caveat would be Wrekin's view that the web might be slight overkill, where an additional layer of MOT with or without asphalt might serve perfectly well as temporary ground protection here. However, I am not an engineer and cannot comment further.

xxiii. It is stated that that *AMS Appendix 1: Recommended Tree works is not consistent with details in other parts of the documents. For example T17 Hornbeam no mention is made of the Crown Reduction to be limited to 1m only as per the specialist Pinus Sonic Topography report.* Again, I think there has been a misunderstanding: it is true that the wording of recommendations in the PICUS report and AMS is not identical, but one is made in the body of the text, the other abbreviated in a table. However, from my perspective it is perfectly clear that the one (AMS App 1) has evolved to subsume the other (PICUS) earlier document, and suggests that the recommended crown reduction be blended in with the deadwood removal. The PICUS crown reduction is a recommendation purely in relation to health & safety considerations. The later AMS recommendation looks to tailor this requirement to aesthetic considerations where deadwood removal may leave 'holes' in the crown. None of this of course

has any real relevance to the planning application (it is not a requirement of the development but a background management consideration).

xxiv. I understand the objection here to be that the works recommendations for a 4.5m height clearance along the lane may not be an absolute requirement of development, and that those specific construction requirements are evolving. The suggestion is that less clearance may now be required. Again, this is a matter of detail.

xxv. The TCR schedule does note all three veteran oak trees (2662, 26671 and 26673) and they are clearly marked as *Category A3* (veteran) on the accompanying plan. Objectors previously alleged in the former application that we had omitted or even overlooked the three veteran trees therein, when the most cursory review of our report to planning (DPS/WHS/AIM/02f) would have revealed their presence in e.g. Photograph 10 and Appendix 1 Tree Survey Schedule.