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**From:** [REDACTED]  
**Sent:** 30 December 2019 14:10  
**To:** [REDACTED]  
**Cc:** enquiries@bats.org.uk  
**Subject:** Objection to Application 2019/6192/T to fell four Leiland Cypress trees  
**Attachments:** Objection to Application 20196192T.doc; DSC04786.JPG; DSC04780.JPG

30 December 2019

**APPEAL AGAINST APPLICATION 2019/6192/T TO FELL FOUR TREES CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 – 2009**

Langbourne Avenue (East), the Holly Lodge Estate, London N6

As residents of Langbourne Avenue (east), who live in the immediate vicinity to four Leyland Cypress trees, we have direct interest and concern in the matter. **We strongly oppose the removal of these trees, protected by the Tree Preservation Order number C882**, on the grounds stated below.

The law relating to conservation areas (Part II of the Planning (Listed Buildings and Conservation Areas) Act 1990) defines them as areas of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance.

**Environment**

Leyland Cypress is one of the best trees at filtering out pollution including particulates from diesel engines due to the dense nature of their foliage and the fact that they are evergreen. Planted near busy roads it can significantly reduce particulate pollution entering houses. In our case, the trees are adjacent to a busy Swains Lane. Research at The University of Sussex and The University of Southampton have shown that Leyland Cypress is 40% better at filtering out particulate pollution than other native species such as hawthorn. The trees with their evergreen foliage are a good source of oxygen, much needed to improve the air quality in London.

As outlined in Camden's Clean Air Action Plan 2019-2022, trees reduce climate change impacts by keeping urban areas cool and reducing flood risk; they help mitigate climate change through carbon storage; and they improve biodiversity and ecological resilience through habitat creation.

**Slope stability**

According to Camden Geological, Hydrogeological and Hydrological Study, published in November 2010, sources of four large river systems are located in the Hampstead Heath area. The course of one of them, the River Fleet and a number of its tributaries runs from Hampstead Heath south south-east and lies beneath the Highgate, including the Holly Lodge Estate (HLE), which is located on one of the steepest slopes in North London, along Swains Lane and West Hill. The Study points out (paragraph 121) that it is these areas (over 7 degrees steep) "that are potentially most prone to becoming unstable if the land topography is adversely disturbed". Further, in paragraph 210, the Study concludes that "removal of vegetation (including tree felling) results in less water extracted from a slope by plants and more water arriving on the slope because of reduced interception of rainfall, which may initiate ground movement through adverse changes in the pressure of water within the soil pores".

These mature trees consume a fair amount of underground water flow, protecting the area where households occasionally experience problems in basements and gardens. Disruption of the established pattern may result in dire consequences and expense.

**Habitat .**

Due to their evergreen foliage, Leyland Cypress create a unique habitat for birds, bats and insects, which is of special value in the urban environment. Trees and shrubs shelter miniature mammals and nesting birds, offering a reliable food source no matter what the weather is.

**Amenities**

This alley of healthy trees in the heart of the Conservation area has a high amenity value and adds to the unique character of the Holly Lodge Estate (HLE).

The evergreen, healthy trees provide good visual and sound screens between the blocks of flats (Langbourne Mansions) and match the height of the blocks proportionately.

Removal of the Leyland Cyprus trees could be irreparable and may leave our street empty. Due to the specific nature of these plants that have been in their location for at least 50 years, there is a real danger nothing might grow in their place. It is worth noting that one Leiland Cypress tree felled in 2017 left an empty space, its stump grinded to the surface and camouflaged. A tiny replacement tree was planted far from the spot.

**Additional costs to Camden**

A high proportion of the Holly Lodge Estate budget comes from Camden Council's own contributions, which normally match those of plot owners. The cost of removing these trees is projected by HLE Committee at £10-12,000, funded in part by Camden Council's own contributions and further expenses could be envisaged, should the soil be replaced and stumps properly removed and not just grinded to surface.

We trust that the Application Number 2019/6192/T will be rejected and the Tree Preservation Order C882 upheld.

Sincerely yours,

 Langbourne Avenue, N6 6PX



Please see the attachments