From: Sally O'Donnell [redacted]
Sent: 12 January 2020 00:00
To: Little, Tom [redacted]
Subject: OBJECTION TO APPLICATION 2019/6192/T

Dear Tom Little,

OBJECTION TO APPLICATION 2019/6192/T

I have submitted my objection online, but I don't think the photos were uploaded so I am resending them to you here below, attached.

I also have a short video, to support my evidence, but I don't know how to include it. [redacted]

many thanks

Sally O'Donnell
[redacted]

OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1, T2, T3 and T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 – 2009

Langbourne Mansions Langbourne Avenue (East), the Holly Lodge Estate, London N6 6PU

I have lived within the Holly Lodge estate since the early 1980s and in Langbourne Mansions since 1987. My flat is north facing and directly looks out at two of the group of four trees. I am one of the residents with the longest history here, and I have watched the trees grow and mature in that time, with the greatest sense of enjoyment and pleasure. These conifer trees are actually an historic feature of the avenue. I also particularly value the privacy they afford my flat (from a particular neighbour's prying eyes, aided by their binoculars, a problem that was a very unpleasant problem before the trees became a bit bigger)

The Estate is covered by a Conservation Area designation which the defines as areas of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance. (Planning (Listed Buildings and Conservation Areas) Act 1990)

Considering the horrific loss of natural habitat for so much wildlife by the recent bushfires in Australia, it doesn't make sense to wilfully destroy the habit of so much wildlife and birds who live and rely on theses trees,

The following points articulate the valid reasons I oppose the application to fell, and the rationale to preserve the trees

1. ***Re: excessive shade.***

The Mansions block in which my (solely north-facing) flat is situated fronts onto Langbourne avenue. The Mansions themselves therefore cast shade as they block the suns path which lies to the southern elevation. The suns path alters by some degree over the seasons rising in the northeast and setting in the northwest with a high arch during summer and in winter rising in the south east and setting in the southwest with a low arch. Early morning sunshine and late evening sunshine penetrate the avenue in summertime. So the tree themselves do not cast shade between themselves and the mansions block. Flats which face north are in the shade due to the orientation of the building which is north:north northwest whereas flats to the southern elevation gain direct sunlight. The suggestion in the supporting document that the trees cause a decrease in natural light level in winter is inaccurate and misleading. This is clearly a seasonal effect due the axis of the planets as it rotates around the sun.

2. ***Re: low Amenity Value***

Amenity is not legally defined. In the governments guidance on TPO trees it is usually taken to include the following criteria-

- public enjoyment and visibility,
- size,
- form and,
- longevity expressed as future potential as an amenity.

Additional attributes may be taken into account including

- rarity,
- cultural or historic value;
- contribution to, and relationship with, the landscape; and
- contribution to the character or appearance of a conservation area.

There is no set prescribed methodology for assessing amenity value. The field of arboriculture has seen a number of methodologies emerge since the 50's they include Helliwell System for tree evaluation, TEMPO (Tree Evaluation Method for Tree Preservation Orders), latterly CAVAT (Capital Asset Valuation of Amenity Trees) developed by the London Tree Officers Association (LTOA). CAVAT does not just evaluate amenity but its holistic value looking at the ecosystem services benefits and monetised capital asset value including the replacement cost equivalent. CAVAT is used by many local authorities especially when utilities apply to remove trees to aid their asset management. When presented with the bill for the cost of removal in terms of CAVAT value to be repaid, the utilities usually adjust their proposal to retain the trees and repair without damaging tree roots. The replacement value of our trees could run into thousands of pound, if not tens of thousands. I urge the Council Camden and its Tree Officer to carry out a **CAVAT evaluation**.

Other factors which can assessed include importance to **nature conservation** or **response to climate change** including ecosystem services. (See below for benefits)

The trees are mature Leyland Cypress and provide high amenity by virtue of their aesthetic form and appearance, being well foliated and are iconic and as well as locally historic cultural features for the Holly Lodge Estate. It is my opinion, that the trees provide a high amenity value and have a useful life expectancy of a further 20+ years.

3. Re: diseases

There are no signs of disease in the retained cypresses evidenced in the application. It should not be enough to mention a diseased tree which was removed as an argument to remove them all. In arboriculture, the presence of a fungal species is not an automatic reason to remove a tree as the presence alone does not render a tree dangerous. The tree should be retained and monitored.

4. ***Re: damage to estate Infrastructure***

If trees in city environments were to be felled because of presence of utilities and roads we would have hardly any trees. Indeed TDAG (Tree Design and Advisory Group) undertook a visualisation exercise a few years ago illustrating existing key iconic sites which have trees and compared to 'photoshopped' versions showing how denuded streets and squares would be without trees. Road and path surfaces can be ameliorated and redesigned to mitigate any root heave of the surfaces. This is often done across many local authorities, such as most disastrously like Sheffield! CAVAT evaluation of the trees is essential so that everyone can see and understand the true value of the trees.

Infrastructure can be repaired and the utility runs provide with proprietary root deflection materials. NJUG provides guidance on working in and around roots and utility apparatus and the British standard for tree in relation to design demolition and construction (BS 5837:2012) also provides guidance for utility installation in and around roots without damaging roots.

It is claimed that the trees cannot be pruned at all. In fact, they could be slightly crown-raised by 500mm to 900mm, maybe more to provide more vertical clearance above roads and cars.

It would also be possible to do minor lateral trimming to provide a hedging or topiary effect providing this is only done to within the green foliage zone.

Specific Benefits of the existing trees

1. ***Mitigating Particulate air pollution***

Leyland Cypress have been shown in research at the Universities of Sussex and Southhampton to perform very well 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.

2. ***Carbon-Oxygen cycle***

I refer to Camden's Clean Air Action Plan 2019-2022, which outlines that trees reduce climate change impacts by keeping urban areas cool and reducing flood risk; they help mitigate adverse aspects of climate change through carbon storage. Their evergreen foliage also produce oxygen, much needed to improve the air quality in London.

3. ***Biodiversity***

They outperform deciduous tree for the provision of nesting and forage for small song birds such as blackbird and thrush finches tits and wren thus improving biodiversity and ecological resilience through habitat creation. One of the joys of

living opposite two of the trees is waking up to the dawn chorus and the melodious quality of bird song throughout the day. It would take many, many decades for this anything like the current population of birds to return, should these trees be felled. The loss of this birdsong would be deeply and profoundly felt…

The trees also support a large population of invertebrate which act as food source for many of the bird and also for bats. **Bats** are frequently seen at dusk and are believed to be ***nesting in the trees.*** The bats are known to use mature trees as navigations routes between feeding and roost areas. These trees are effectively 'bat highways'. Removal of the trees will adversely impact local bird population, robbing them of scare nesting opportunities and lead to local population decline.

4. 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 unintended adverse consequences and expense.

5. Noise abatement

The trees act as sound dampening screen by absorbing noise such as traffic etc. (At the same time, the trees are perceived by many to act as ***cathedrals of birdsong***, throughout the day. The effect of the loss of this would be profound. It would take many, many decades for this anything like the current population of birds to return, should these trees be felled).

6. Visual screening

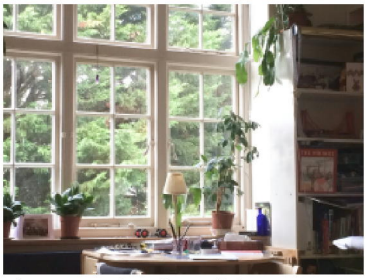
The cypress trees provide excellent and much needed visual screening from the mansions to the north. I do not have a garden of my own, however this green outlook onto the trees is my garden, giving me deep joy.

Without prejudice in the event of consent

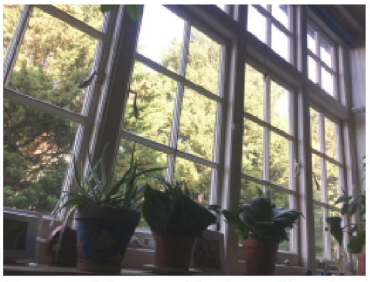
In the event of the valid neighbour objections are disregarded, I would ask that the specific conditions below are applied.

1. Replacement of cypress ideally with coniferous species (as conifers are historically characteristic to the avenue). Suitable species some of which are deciduous include Dawn Redwood *Metasequoia glyptostrobus*, European larch *Larix decidua,* Western Red Cedar *Thuja Plicata,* Maidenhair tree *Gingko biloba*, or Incense Cedar *Calocedrus decurrans*.
2. Replacement with advanced nursery or Semi mature stock.
3. Specialist retrofitting of root deflection systems close to utility runs.
4. Slope stabilisation and if necessary provision of suitable replacement soil and better edge restraint along the footpaths.
5. Resurfacing of the road with specialist systems (Greenfix Geoweb or similar) to provide root volume capacity to support growth and maturation of trees.

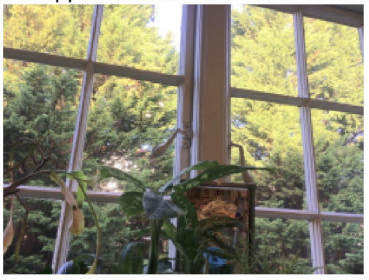
Our lovely green outlook, not overshadowed by the higher building opposite.
The trees do NOT block the light, but provide a wonderful green view.
Any lack of light is due to the clouds! (resident of 32 years!)



The green view from living room

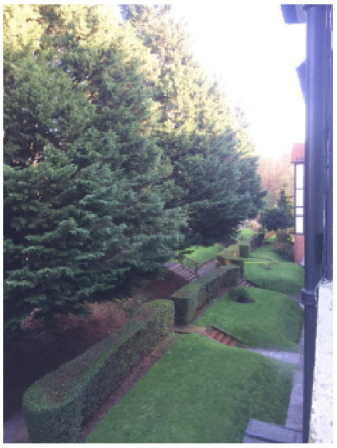


The sun shines on the top of the trees, from
the opposite south side of our building



Though the sun never shines on this flat, due to its
orientation – not the trees! We can enjoy the lightlight ON the trees.

Two of the trees face our building



Treetop sunlight, beautiful birdsong and green views, which we treasure.
Please let us keep this!

[redacted]