Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	N O'Donnell	11/01/2020 00:23:51	OBJ	OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1-T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 – 2009 Langbourne Mansions Langbourne Avenue (East), the Holly Lodge Estate, London N6 6PU My family have had a residence in the area for several decades. The flat is north facing and directly looks out at two of the group. We love the trees and especially value the privacy screening they afford the flat. The area sits within the Conservation Area which the Planning (Listed Buildings and Conservation Areas) Act 1990) defines as areas of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance. Rebuttal of reasons given on the form for felling: 1. Excessive shade. The trees lie to the north of the northern elevation of the Mansions. The Mansions themselves therefore cast shade as they block the suns path. So the tree themselves do not cast shade between them and the mansions. Flats which face north are in the shade due to the orientation of the building 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 frankly ridiculous. This is clearly a seasonal effect due the axis of the planets rotation around the sun. 2. Low Amenity Value Amenity is not defined in law however it is usually taken to include the following criteria- public enjoyment and visibility, size, form and longevity expressed as future potential as an amenity. It can also include rarity, cultural or historic value; contribution to, and relationship with, the landscape; and contribution to the character or appearance of a conservation area. While there is no set prescribed format for assessing this various methodologies include Helliwell and TEMPO, with CAVAT (LTOA) being able to ascribe a monetised value to trees in the public domain. CAVAT is used by many local authorities especially when utilities apply to remove tree 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. The values of these tree likely runs into tens of thousands of pounds. I urge the Council Camden Tree Officer to carry out or commission a CAVAT evaluation. Other factors which LPAs can add to the assessment 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 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 20+ years. 3. Diseases There are no signs of disease in the retained cypress evidenced. 4. 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 sites with trees and compared to ‘photoshopped’ versions showing how denuded streets and square 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. Don’t be 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

Application No:	Consultees Name:	Received:	Comment:	Response:

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 the other 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 /staying opposite two of the trees is waking up to the dawn chorus and the melodious quality of bird song throughout the day. They 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 known to use matures tree as navigations route between feeding and roost areas. These trees are effectively ‘bat highways’.
Removal of the tree 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.
6. Visual screening
The cypress trees provide excellent visual screening from the mansions to the north.

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	O'Donnell	11/01/2020 16:09:25	OBJ	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 object to the felling of these magnificent trees. One of the joys of living or staying opposite two of the trees is waking up to the dawn chorus and the melodious quality of bird song throughout the day. Bats are frequently seen at dusk and are known to use mature trees as navigations route between feeding and roost areas. These trees are effectively 'bat highways'. They enhance privacy of the flats and prevent spying on neighbour by unscrupulous person with binoculars. Their removal would be contrary to Camden policy for trees and biodiversity. The reason for my objection is that the reasons given for felling –excessive shade, low amenity value, disease infrastructure damage - are not valid and should be disregarded. 1. Excessive shade. The Mansion block is south of the tree and the tree are situated to the north of the Mansion. The tree does not cast the predominant shade the Mansions block does. The trees do not impact the natural light levels in winter. The Seasonal variation is due to the Axis rotation of the Earth as it orbits the sun. Therefore the claim that the tree cause excessive shade is not valid. 2. 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. Amenity can be evaluated by TEMPO (Tree Evaluation Method for Tree Preservation Orders) but CAVAT (Capital Asset Valuation of Amenity Trees) developed by the London Tree Officers Association (LTOA) should be undertaken in his instance. This would examine all benefits including ecosystem services, nature conservation and give the tree a capital asset value taking into account the replacement cost equivalent. I urge the Council Camden and its Tree Officer to carry out a CAVAT evaluation. These Leyland Cypress are mature and provide high amenity by virtue of their aesthetic form, size, 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 20+ years. 3. 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 asthe presence alone does not render a tree dangerous. The tree should be retained and monitored. 4. Damage to estate Infrastructure Don't be like Sheffield!! CAVAT evaluation of the trees is essential so that everyone can see and understand the true value of the trees.

Application No:	Consultees Name:	Received:	Comment:	Response:

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: crown raised for 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 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.
2. Carbon -Oxygen cycle
These trees 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.
• They also support a large population of invertebrate which act as food source for many of the bird and also for bats.
• They are used by bats.
• 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
They bind the slopes. Any disturbance of soil falling onto footpaths is cause by people.
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.
6. Visual screening
The cypress trees provide excellent and much needed visual screening from the mansions to the north.

Without prejudice in the event of consent
If my objection is disregarded I ask that specific conditions 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.

Application No:	Consultees Name:	Received:	Comment:	Response:
				4. Slope stabilisation and if necessary provision of suitable repalcementsoil 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.

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	Jaqueline Horan	11/01/2020 23:21:21	OBJ	OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1, T2, T3 and T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 – 2009 Response: I strongly oppose the proposed felling of Leylandii on Langbourne Mansions Many birds utilise Leylandii for nesting as they offer good shelter for their nests. It's never a good time to cut back or fell Leylandii with active nests in! And it is widely believed there are also bats there! The Leylandii on Langbourne do not block light – this is a myth. The trees are located on the south side of the street to the north of their adjacent blocks, so they never block the sunlight. The south-facing blocks on the other side of the road are placed higher, and the trees do not block their light either. It would be a criminal offence to cut the trees if it would damage or destroy active nests and the work should be postponed. It would be distressing for the birds and if a nest is destroyed and the local bird population frightened away. Tree felling should be avoided between March and August, being peak breeding time for many birds. Any cutting work to trees should be left until the end of the breeding season. Outside of these dates, there may also be early or late nesters. With the presence of many next in these trees, they could only legally be felled if there was irrefutable proof of no currently nesting birds or bats To supports my argument to preserve the trees I include a variety of perspectives and references: Tree loss impacts on ecological connectivity Removing 60% of roadside trees decreased the number of successful dispersers by up to 17% https://www.sciencedirect.com/science/article/pii/S157495411730211X Nest sites as a key resource for population persistence: A case study modelling nest occupancy under forestry practices https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6181357/ Tree removal has long-term impact on bird community composition https://wildlife.org/jwm-study-tree-removal-has-long-term-impact-on-bird-community-composition/ According to the report, at least 40% of bird species worldwide are in decline, with researchers blaming human activity for the losses. https://www.theguardian.com/environment/2018/apr/23/one-in-eight-birds-is-threatened-with-extinction-global-study-finds When trees are removed or destroyed en masse (i.e. 4 huge trees in one go), the species living in that area lose their natural habitats, and some are not able to survive the change. When animals or plants die as a result of deforestation, the biodiversity of that area decreases. “This judgement recognises the importance of urban trees and the social benefit that they bring. More

Application No:	Consultees Name:	Received:	Comment:	Response:

importantly it clarifies what foreseeability actually means. This decision moves the perception away from the position that a tree on clay soil near a building equals a “reasonably foreseeable” risk, as has previously been presumed”

Read more at
https://www.rspb.org.uk/birds-and-wildlife/bird-and-wildlife-guides/ask-an-expert/previous/leylandii.aspx#JDZ4V0SwR5uGccQO.99

The decision is of considerable importance to local authorities and housing associations managing their tree stocks. It confirms that simple proximity of a tree to a building does not elevate the risk of damage from being a potential to ‘a real risk’ of damage. An assessment needs to be made as to whether there is a ‘real risk’. Factors that should be considered include whether there have been previous claims in the vicinity and any other factor that might mean that a tree poses ‘a real risk’. The importance of frequent and severe pruning of trees identified as ‘a real risk’, prior to damage occurring, is again highlighted. However, where the reasonably foreseeable risk of damage is small, it is reasonable to match a pruning regime to the risk, and in some possible scenarios, not to maintain at all. The social benefit of ‘a treed’ environment was highlighted, in that it would not be reasonable to fell all trees that pose a risk (but not ‘a real risk’) to eliminate or minimise that risk.
https://www.ltoa.org.uk/resources/legal-cases-involving-trees

New study shows how trees clean the air in London
https://www.southampton.ac.uk/news/2011/10/trees-clean-the-air-in-london.page

Tree loss due to subsidence damage claims to low rise buildings is a contentious issue in the UK. Undoubtedly tree removals can have a high negative impact on amenity and the environment at the local level. At the wider level, the impact is generally less than commonly thought.
https://www.localsurveyorsdirect.co.uk/tree-related-subsidence-damage

Where trees are subject to a TPO any tree works requires an application to the relevant planning authority detailing the proposed works and the reasons for that work. The council will require evidence substantiating the role of the relevant tree(s) as a causal factor in the damage. That evidence is obtained from site specific investigations and laboratory testing of samples (soils and roots). Where trees of the same species are implicated, a DNA test may be required.

In addition, monitoring data confirming a cyclical pattern of movement consistent with vegetation induced soil volume changes will normally be required, and in some cases 12 months of data is requested.
Environmental benefits:

- absorbing airborne pollutants like ozone, carbon, sulphur and nitrogen dioxides and acting as carbon sinks (converting carbon dioxide into plant tissue)
- filtering the air of dust, other particulates and noise
- producing oxygen
- reducing localized extremes in temperature (helping to cool the air in summer and warm the air in winter)

Application No:	Consultees Name:	Received:	Comment:	Response:
				• reducing the effects of flash floods • providing habitats for a variety of wildlife Economic benefits: • increasing property and land values (by 5-10% for residential or commercial properties and 27% for undeveloped land (with mature trees present)) • providing a sustainable source of woodchip bio-fuel (as a by-product of tree works) and a source of compost (leaf matter) for use in parks • can provide employment through all aspects of the industry Social and health benefits: • providing a more beautiful setting, especially in urban areas • helps reduce stress levels throughout the borough • softens and brings colour and character to built up environment • releases scents and aromas that can promote a positive emotional state which contributes to better health and well being https://www.sutton.gov.uk/info/200453/parks_trees_and_open_spaces/1126/trees I trust these points will be fully considered and the trees on Langbourne Avenue may continue to give shelter to the birds and bats, as well as onions pleasure to those who live in the building most effected, such as myself
2019/6192/T	Sarah Hanna	11/01/2020 22:21:52	OBJ	OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1, T2, T3 and T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 ¿ 2009 I live in one of the buildings which face two of these trees, Tree 1 and 2 and strongly object to the proposed felling The trees may be tall but they are not dangerous. The give us the delight of some amazing birdsong all day long. To take that constant source of delight throughout the year away from us would be a disaster! Yes, some of the birds have droppings ¿ but that is natural no justification for removing them. That would be a crime against nature. Someone mentioned flats being damp and with poor insulation ¿ that has nothing to do with the trees! Having lived in this building for many many years (decades), the trees not ¿block out all natural light¿, and the foliage is nowhere near our windows. there are other reasons for a lack of light - it is not the trees. Someone else mentioned these tress are not major contributors to native wildlife habitat ¿ yes they are!! If anything has to go, take only Tree no: 4, furthest east, closes to Swain¿s Lane¿ and at the very least please spare Tree no1!! Thank you

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	Angela Nolf	11/01/2020 23:45:56	OBJ	There have been sighting of bats nesting there, aren't we supposed to be protecting them? The trees do not block the light - but the sun is on the south side, so no light is blocked . (A little birdpoo isn't so bad if if it means we can keeps the birds...) It would take years and years to recover the lost of birdsong if all four trees and felled at the same time ... the birds would disappear overnight I am distraught at the thought

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	Sally O'Donnell	11/01/2020 21:11:56	OBJ	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

Application No:	Consultees Name:	Received:	Comment:	Response:

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.

Application No:	Consultees Name:	Received:	Comment:	Response:

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.

Application No:	Consultees Name:	Received:	Comment:	Response:
				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! From 73 Langbourne Mansions, Langbourne Avenue, N6
2019/6192/T	Sarah Hanna	11/01/2020 22:49:07	OBJ	OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1, T2, T3 and T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 ¿ 2009 I live in one of the buildings which face two of these trees, Tree 1 and 2 and strongly object to the proposed felling. Further to my earlier comments I would like to respond to some comments I have just read from some who are supporting the felling of 4 trees: ¿The windows of these dwellings are now almost completely obscured by the foliage which is getting ever closer¿ Totally absurd and inaccurate! I claim this as someone whose flat faces two of these trees. ¿It is completely wrong to suggest that this makes a welcome screen¿ I strongly disagree! The flats on the other side are higher (they also have both south and north facings. My flat is ONLY north facing) and I totally WELCOME this green screen. Privacy is an issue, and I don¿t want to have to have net curtains! ¿It will be a great relief to the residents if this problem is removed and they can enjoy daylight in their homes once again¿. Wrong! ¿ I have lived here for many decades, I don¿t have a south-facing view. We DO have daylight, though not direct sunlight ¿ that is not because of the trees... I would welcome any tree officer to come and see the view from my flat for themselves

Application No:	Consultees Name:	Received:	Comment:	Response:
2019/6192/T	Jaqueline Horan	11/01/2020 23:23:15	OBJ	OBJECTION TO APPLICATION 2019/6192/T TO FELL FOUR TREES (T1, T2, T3 and T4) CURRENTLY UNDER THE TREE PRESERVATION ORDER C882 – 2009 Response: I strongly oppose the proposed felling of Leylandii on Langbourne Mansions Many birds utilise Leylandii for nesting as they offer good shelter for their nests. It's never a good time to cut back or fell Leylandii with active nests in! And it is widely believed there are also bats there! The Leylandii on Langbourne do not block light – this is a myth. The trees are located on the south side of the street to the north of their adjacent blocks, so they never block the sunlight. The south-facing blocks on the other side of the road are placed higher, and the trees do not block their light either. It would be a criminal offence to cut the trees if it would damage or destroy active nests and the work should be postponed. It would be distressing for the birds and if a nest is destroyed and the local bird population frightened away. Tree felling should be avoided between March and August, being peak breeding time for many birds. Any cutting work to trees should be left until the end of the breeding season. Outside of these dates, there may also be early or late nesters. With the presence of many next in these trees, they could only legally be felled if there was irrefutable proof of no currently nesting birds or bats To supports my argument to preserve the trees I include a variety of perspectives and references: Tree loss impacts on ecological connectivity Removing 60% of roadside trees decreased the number of successful dispersers by up to 17% https://www.sciencedirect.com/science/article/pii/S157495411730211X Nest sites as a key resource for population persistence: A case study modelling nest occupancy under forestry practices https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6181357/ Tree removal has long-term impact on bird community composition https://wildlife.org/jwm-study-tree-removal-has-long-term-impact-on-bird-community-composition/ According to the report, at least 40% of bird species worldwide are in decline, with researchers blaming human activity for the losses. https://www.theguardian.com/environment/2018/apr/23/one-in-eight-birds-is-threatened-with-extinction-global-study-finds When trees are removed or destroyed en masse (i.e. 4 huge trees in one go), the species living in that area lose their natural habitats, and some are not able to survive the change. When animals or plants die as a result of deforestation, the biodiversity of that area decreases. “This judgement recognises the importance of urban trees and the social benefit that they bring. More

Application No:	Consultees Name:	Received:	Comment:	Response:

importantly it clarifies what foreseeability actually means. This decision moves the perception away from the position that a tree on clay soil near a building equals a “reasonably foreseeable” risk, as has previously been presumed”

Read more at
https://www.rspb.org.uk/birds-and-wildlife/bird-and-wildlife-guides/ask-an-expert/previous/leylandii.aspx#JDZ4V0SwR5uGccQO.99

The decision is of considerable importance to local authorities and housing associations managing their tree stocks. It confirms that simple proximity of a tree to a building does not elevate the risk of damage from being a potential to ‘a real risk’ of damage. An assessment needs to be made as to whether there is a ‘real risk’. Factors that should be considered include whether there have been previous claims in the vicinity and any other factor that might mean that a tree poses ‘a real risk’. The importance of frequent and severe pruning of trees identified as ‘a real risk’, prior to damage occurring, is again highlighted. However, where the reasonably foreseeable risk of damage is small, it is reasonable to match a pruning regime to the risk, and in some possible scenarios, not to maintain at all. The social benefit of ‘a treed’ environment was highlighted, in that it would not be reasonable to fell all trees that pose a risk (but not ‘a real risk’) to eliminate or minimise that risk.
https://www.ltoa.org.uk/resources/legal-cases-involving-trees

New study shows how trees clean the air in London
https://www.southampton.ac.uk/news/2011/10/trees-clean-the-air-in-london.page

Tree loss due to subsidence damage claims to low rise buildings is a contentious issue in the UK. Undoubtedly tree removals can have a high negative impact on amenity and the environment at the local level. At the wider level, the impact is generally less than commonly thought.
https://www.localsurveyorsdirect.co.uk/tree-related-subsidence-damage

Where trees are subject to a TPO any tree works requires an application to the relevant planning authority detailing the proposed works and the reasons for that work. The council will require evidence substantiating the role of the relevant tree(s) as a causal factor in the damage. That evidence is obtained from site specific investigations and laboratory testing of samples (soils and roots). Where trees of the same species are implicated, a DNA test may be required.

In addition, monitoring data confirming a cyclical pattern of movement consistent with vegetation induced soil volume changes will normally be required, and in some cases 12 months of data is requested.
Environmental benefits:

- absorbing airborne pollutants like ozone, carbon, sulphur and nitrogen dioxides and acting as carbon sinks (converting carbon dioxide into plant tissue)
- filtering the air of dust, other particulates and noise
- producing oxygen
- reducing localized extremes in temperature (helping to cool the air in summer and warm the air in winter)

Application No:	Consultees Name:	Received:	Comment:	Response:

- reducing the effects of flash floods

- providing habitats for a variety of wildlife

Economic benefits:

- increasing property and land values (by 5-10% for residential or commercial properties and 27% for undeveloped land (with mature trees present))

- providing a sustainable source of woodchip bio-fuel (as a by-product of tree works) and a source of compost (leaf matter) for use in parks

- can provide employment through all aspects of the industry

Social and health benefits:

- providing a more beautiful setting, especially in urban areas

- helps reduce stress levels throughout the borough

- softens and brings colour and character to built up environment

- releases scents and aromas that can promote a positive emotional state which contributes to better health and well being

https://www.sutton.gov.uk/info/200453/parks_trees_and_open_spaces/1126/trees

I trust these points will be fully considered and the trees on Langbourne Avenue may continue to give shelter to the birds and bats, as well as ongoing pleasure to those who live in the building most effected, such as myself