

From: Adrian Salt And Pang
Sent: 02 August 2021 20:24
To: Josh Lawlor; Planning
Cc: 'Rad Neighbours'
Subject: 2021/1358/P No. 28 Avenue Road - Comments on Arboriculture / Landscaping proposals

Dear Mr Lawlor

I refer to the above application and would like to lodge the attached review on behalf of our client, Mrs Howard of 1 Radlett Place for your consideration. The review was commissioned by Mrs Howard who is concerned about the application proposals for the trees and landscaping on the application site and in particular, the impact of the proposals on the TPO trees in her garden.

The Review highlighted discrepancies and omissions in the proposal Arboricultural Impact Assessment and potential for the proposed built structures to limit the growth of existing trees. The Review recommends that robust and complete information should be submitted by the Applicant concerning the impact of the proposal on trees and a detailed arboricultural method statement should be proven as deliverable.

To safeguard the amenity of the residents of 1 Radlett Place, adjacent residential properties and users of the adjacent Primrose Hill public open space, a fully developed landscape scheme including tree planting should be required prior to the planning decision being made.

Please kindly contact our office for further assistance.

Yours sincerely

Annie Pang

**ANNIE PANG, BA, DipUPI, MScPropInv, MRTPI , MHCLG Appointed High Street Task Force RTPI Expert
Founder Director**

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Celebrating our 25th year of providing expert planning advice.

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**Planning Application,
Proposed Development at 28 Avenue Rd,
NW8 6BU
Application ref: 2021/1358P**

Arboricultural Review of Submission

on behalf of

**Radlett Holdings Ltd, 1 Radlett Place, London NW8
6BT**

Status : Planning

23rd July 2021

The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment & the Arboricultural Association

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1 Introduction

- 1.1 The Landscape Partnership has been commissioned by Adrian Salt And Pang Limited on behalf of Mrs S Howard, the owner of 1 Radlett Place, to review the arboricultural information submitted in support of planning application for Proposed Development at 28 Avenue Road, NW8 6BU, Application ref: 2021/1358P.
- 1.2 The proposed development site once included a large house set within landscaped grounds dominated by a significant number of now mature trees. The house was demolished in the 1960s.
- 1.3 The site includes a number of landscape scale trees which combine with those in the adjacent Primrose Hill and similar scale trees within adjacent gardens, including 1 Radlett Place.
- 1.4 The site and the adjacent premises are within the Elsworthy Road Conservation Area. Conservation area designation provides a degree of protection to trees which achieve the criteria required to be protected by the conservation area regulations. Works to trees requires a 6-week notification to the local authority, in this case the London Borough of Camden.

2 Review of Arboricultural Submission

- 2.1 The planning application is supported by a tree survey and arboricultural assessments carried out by Landmark Trees in March 2021. The tree survey was carried out on 13th February 2020. The survey work was carried out in accordance with BS 5837 2012, which provides a recognised approach to the assessment of the relative quality of trees and the potential adverse impacts that the proposed development may have on them, both within the development site boundary, and for off-site trees that may be affected by the proposal due to their size and potentially extensive root and crown systems that may occupy space within the development site. Off-site trees were not measured during the tree survey, dimensions were estimated, and approximate root protection areas drawn.
- 2.2 The tree survey data appears to be accurate, although it has not been possible to check tree dimensions on site. A substantial London Plane to the north west of the proposed pool has been omitted from the survey (refer to Fig.2 Tree Plan for 1 Radlett Place and Landmark Tree Survey Omissions Application Number 2021/1358P).

Trees in 1 Radlett Place

There are two mature London Plane trees in 1 Radlett Place which could be impacted by the proposed development. T102 on the Landmark Trees drawing is shown in the attached plan OSEL Drawing (700) 002, which shows the position of trees in 2013.

- 2.3 The tree survey drawing provided appears to coincide with the topographical information upon which it is based.
- 2.4 The Landmark Trees Arboricultural Impact Assessment (AIA) drawing appears to be incorrectly aligned and is slightly to the west of what appear to be stem locations on the drawing, indicated by circles. This apparent discrepancy should be checked and corrected if necessary, or perhaps explained. The AIA includes very limited information on the likely impact of the proposed development on trees, identifying several locations where a proposed structure impinges on the root protection area of a retained tree, which it deals with by expanding the root protection area to compensate for the loss.
- 2.5 T39 has a bin and bike store within its Root Protection Area (RPA) which is extended towards the gatehouse. Whilst this provides a strategy of sorts, it is incomplete and includes no information on how the bin and bike store would be constructed or how the RPA not built on would be protected during the proposed works. These issues can be dealt with by an arboricultural method statement which has not been provided.
- 2.6 There are examples where the AIA appears to miss other locations where trees will be affected by the proposal. For example T89, a category A Sycamore, appears to have hard paving, walls and, if the tree survey drawing is aligned on the on the circle shown within the middle of what appears to be a planting bed, the proposed building slightly impacts on the RPA. Other trees are similarly affected by proposed hard paving and walls.
- 2.7 The proposed Pool and Pavilion has little immediate impact on trees, although leaf fall may be an issue. However, we raise the following concerns:
- Potential to restrict new tree planting.
 - Possible impingement on the root protection areas of several trees, including T96, a large though not fully mature Horse Chestnut.
 - The Landmark Trees AIA drawing provides information on proposed new planting. However, no indication of species or sizes is provided.
 - The locations shown for proposed trees appear to be largely unlikely to result in the successful establishment of new trees, because of the density the existing tree cover, unless some of the existing trees are removed or substantially cut back. It is noted that the applicant proposes to deal with landscape matters including the planting of new trees via a

condition of a planning approval.

- Given the uncertainty regarding the likelihood of successful establishment of new trees, the issue of planting proposals and the provision of new trees should be dealt with at the planning stage, thereby minimizing any risk of the intended planting scheme failing.

2.8 In summary, the following issues with the submitted arboricultural assessment information should be resolved before determination:

- The tree's omitted from the survey should be added (see annotated drawing at appendix 2.
- Data regarding trees off-site should be acquired and used in the arboricultural assessments.
- A co-ordinated approach to include trees in 1 Radlett Place should be adopted in any revised arboricultural assessments.
- The apparent discrepancy in tree locations should be resolved.
- A more detailed arboricultural impact assessment should be carried out, based on additional and revised tree location information.
- An arboricultural method statement should be required.
- A planting scheme should be required to mitigate tree losses.

3 Conclusions

- 3.1 The supporting arboricultural information is limited and not sufficiently detailed to enable a robust assessment of the likely impact that the proposed development will have in terms of tree loss, damage to existing trees and whether the new trees proposed are likely to become successfully established and reach their full mature potential.
- 3.2 The application in terms of the tree assessment within the AIA provided should be refused or at least deferred subject to more information being provided.
- 3.3 If the Council are minded to approve the proposed development, they should consider the use of conditions to ensure that tree retention as shown is deliverable and that the site preparation and construction activities remain sufficiently distant from onsite retained trees and offsite trees, to ensure that they are not unduly affected by the construction of the proposed development.
- 3.4 Suggested areas to be covered by tree related conditions:
- A detailed Arboricultural Impact Assessment should be carried out and should inform a detailed Arboricultural Method Statement (AMS). The AMS should be sufficiently robust to ensure that trees shown to be retained are not damaged by the construction process. It should include information on tree protection barriers, ground protection within the RPA of retained trees (tree protection barriers and ground protection should be erected as the first activity when the construction team occupy the site) a scheme of supervised excavation within the RPA of retained trees and details of the location of services and their installation.
 - A project arboriculturist should be appointed to deal with tree issues arising during the development, if it is approved by the Council. A scheme of arboricultural inspection of tree protection measures should be required and implemented. The project arboriculturist should be required to convene a pre-start meeting between the construction site manager, the Council's tree officer and the project arboriculturist. This meeting should precede occupation of the site by the construction team.
 - Tree-works necessary to enable access to the site, and including tree removal, should be carried out prior to occupation of the site by the construction team.

4 Recommendations

4.1 In response to the consultation, the following issues should be raised with the LPA:

- The Council should be encouraged to refuse or defer the application, pending more robust and complete information concerning the impact of the proposal on trees.
- The AIA drawing should be correctly aligned with the proposal drawing, and the process of the AIA repeated and extended to include impacts currently omitted or ignored. The revised AIA should be more robust and consider the practicalities of the proposal, where it is within the root protection areas of retained trees, and its impact on the retention of those trees in practical terms.
- The arboricultural submission should be extended to include a detailed arboricultural method statement which should be proved as deliverable.
- A fully developed landscape scheme including tree planting should be required prior the decision on the application being made. This would safeguard the amenity of the resident of 1 Randlett Place, adjacent residential properties and users of the adjacent Primrose Hill public open space.

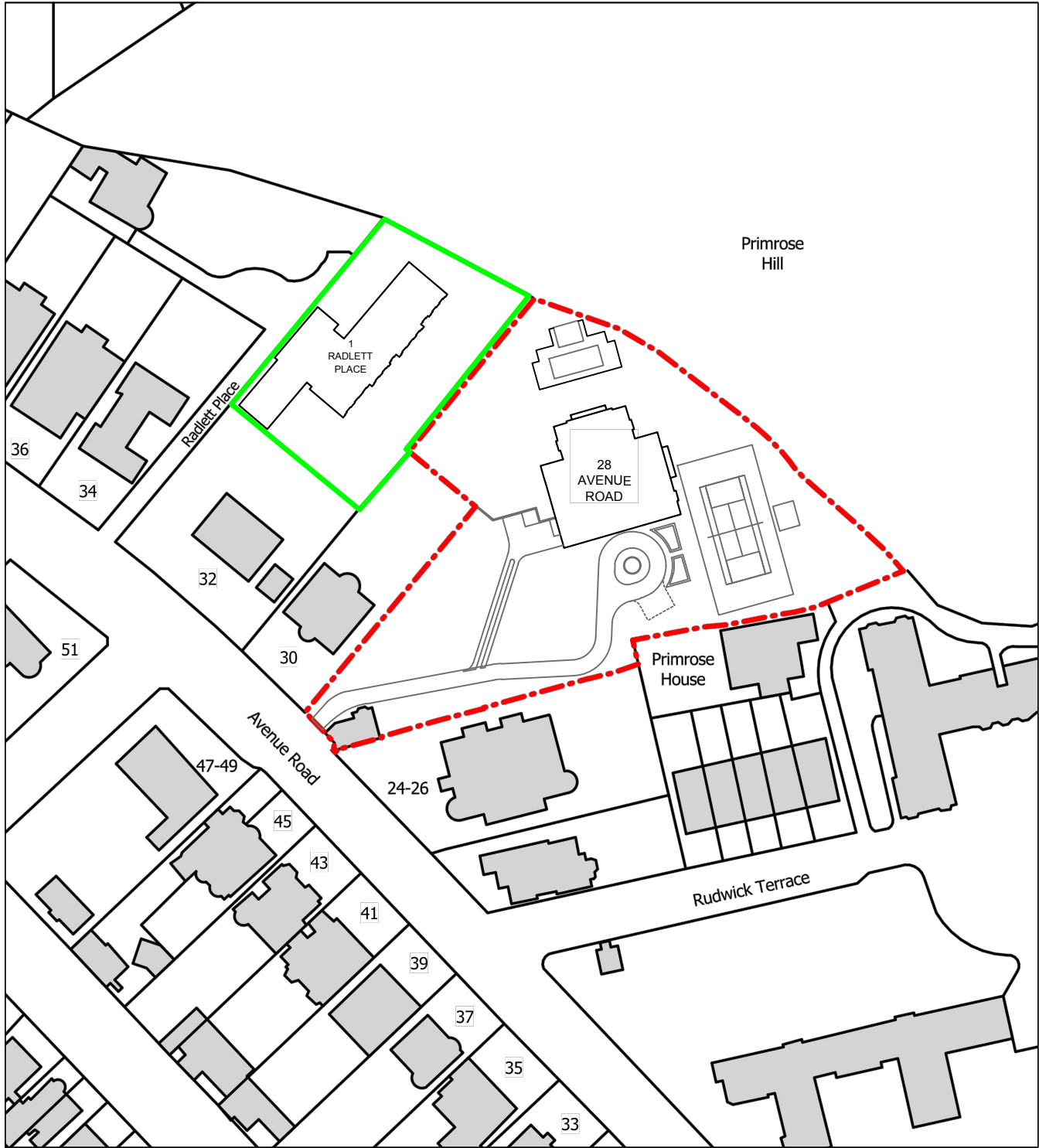
4.5 Some of the proposed elements of the development should be revised to reduce their impact on existing trees and ensure that the existing and proposed trees do not have an increasing impact on the development, if approved. Most notable is the proposed pool, which will suffer the inconvenience of leaf fall and the maintenance associated with it. This element of the proposal should be reconsidered.

5 Project Contact Details

Client:	Radlett Holdings Ltd, 1 Radlett Place NW 8 6BT
Arboriculturist:	Michael Roseveare, The Landscape Partnership Tel: 01394 380509
Local Planning Authority:	Camden Borough Council

Apendix1

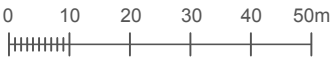
Figure 1 Site Location Plan



KEY:

APPLICATION SITE -
28 AVENUE ROAD

1 RADLETT PLACE



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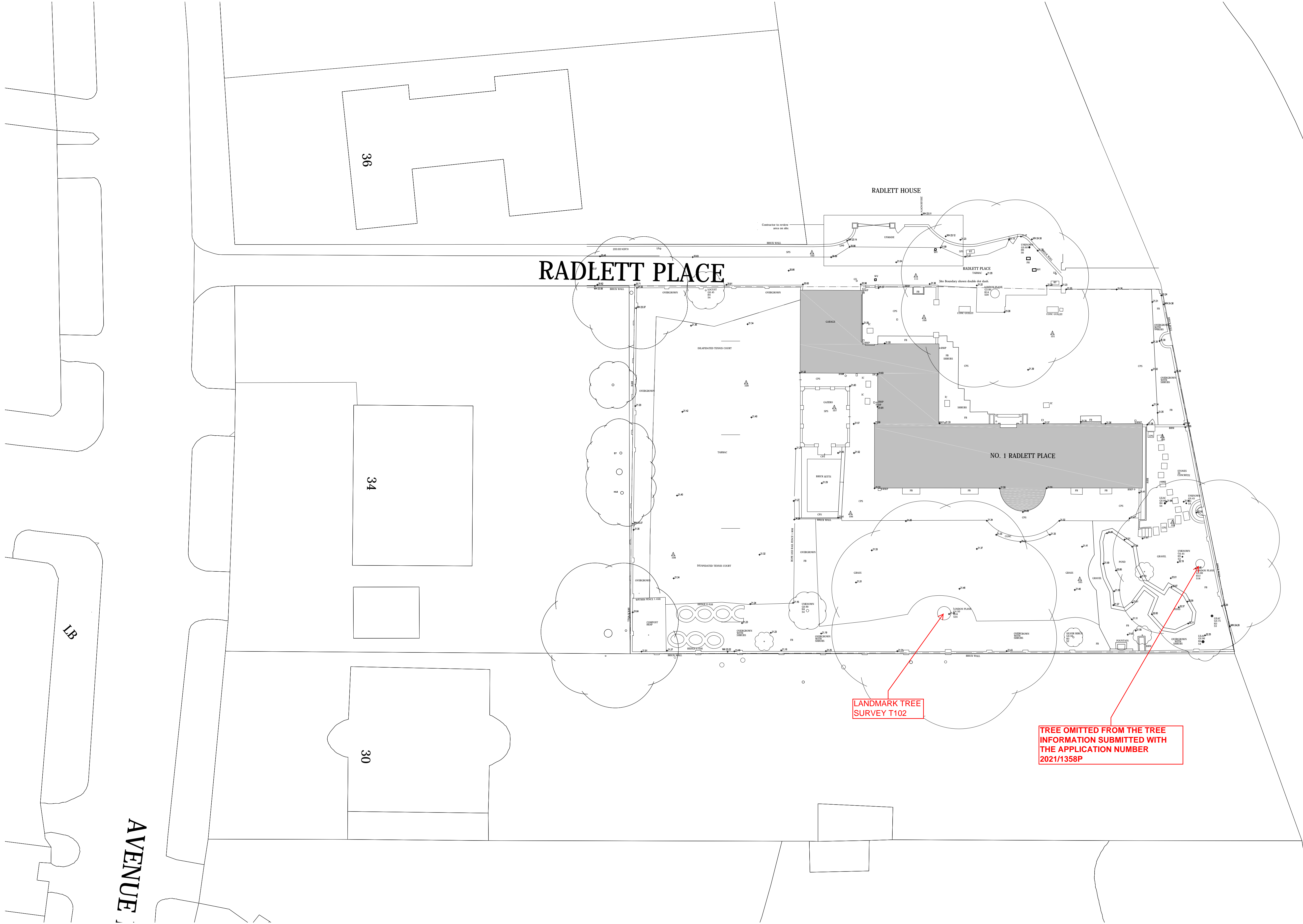
Project ANALYSIS OF ZONE OF OVERLOOKING	
Client S HOWARD, RADLETT HOLDINGS LTD, 1 RADLETT PLACE, NW8 6BT	
Subject OBJECTIONS TO APPLICATION REF: 2021/1358/P - PROPOSED DEVELOPMENT AT 28 AVENUE ROAD, LONDON NW8 6BU	
Drawing Title SITE LOCATION PLAN	
Planning Drawing Number FIG. 1	Revision
Scale 1:1250 @ A3	Date JUNE 2021



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Appendix 2

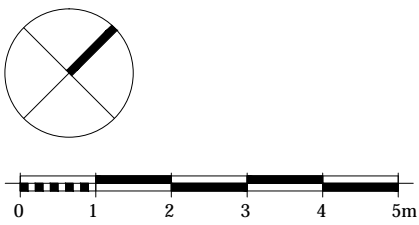
Fig.2 Tree Plan for 1 Radlett Place and Landmark Tree Survey Omissions Application Number 2021/1358P



EXISTING SITE PLAN

THE CONTRACTOR MUST VERIFY ALL DIMENSIONS ON SITE BEFORE MAKING SHOP DRAWINGS OR COMMENCING WORK OF ANY KIND. NO DIMENSIONS TO BE SCALED FROM THIS DRAWING.

REV.	DATE	REVISION
PL01	26.10.12	Planning Issue
PL02	04.07.13	Issued for Planning



ISSUED FOR PLANNING
DATE:04.07.13

Osel architects and
development consultants

PROJECT:
1 RADLETT PLACE
LONDON
NW8 6BT
CLIENT:
Radlett Holding Ltd

DRAWING:
000 Site Plans
Existing Site Plan

DRAWING No.:
(700)002

REV:
PL02

SCALE: 1:200 @ A1

DRAWN: MC

DATE: 06.13

CHECKED: EW

DATE: 06.13

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