Landmark Trees

Our ref: DML/52AVR/Lttr/03

Max O'Brien
Domvs London
33B Ransomes Dock Business Centre
Parkgate Road
London
SW11 4NP

6th October 2022

Dear Max,

Re: Trial Pit Findings at 52-54 Avenue Road, NW8

I write following receipt of comments from Camden Council on the current scheme before planning and in relation to the following:

- **Trees:**
  - *T5 & T27 are two large, mature, cat. A London planes on Elsworthy Road frontage of the site that are LB Camden owned and managed and are off site. Both trees are highly visible from the public realm and significantly contribute to the character and appearance of the conservation area. Both trees provide a high level of amenity to the public and form part of an important landscape feature as they share some degree of uniformity with other trees of the same species, size and age along the western end of Elsworthy Road. Both trees have proposed root protection area encroachments of >1% with trial pit investigations demonstrating that one 110mm root is required to be severed.* ***However, the trial pit is 800mm deep and 2m long which is not considered large/deep enough to categorically demonstrate that the two largest, most significant, most valuable trees on site will not be adversely affected by the scheme. Further information required –***

The comment references two plane trees, T5 & T27. However, the site investigations were prepared for T5 only: T27's root system was dismissed as a material constraint on planning by Camden's Senior Tree Officer, Nick Bell, at our site meeting on 21/9/22. I assume Mr Bell is not the author of these latter comments. Nick was not convinced site investigations were needed for this tree in view of the substantive hard landscaping in the area affected. So, it would be incorrect (after the fact) to criticise the 2m trial pits as inadequate to cover both trees (though understandable if the officer was unaware of these discussions).

The officer making the comments (presumably Nick Bell's colleague) is unfortunately also unaware of further discussions and investigations that occurred at our site meeting. Mr Bell and I reviewed a series of other trial pits that had been undertaken prior to our meeting by specialist contractor, Ruskins (please find a summary of these investigations enclosed). Mr Bell accepted that the series of discrete pits undertaken by Ruskins indicated little in the way of significant rooting and ample building debris / rubble doubtless acting as a constraint. My recollection though is that he did not feel these scattered discrete pits were fully adequate and some further extended trenches were required to "join up the dots". So, obviously the comment is incorrect to suggest the applicant is relying solely on a single 2m length trench to demonstrate his point. The 2m trenches (of which two fall within T5's RPA) were a follow-up exercise building upon the original "scatter-gun" approach adopted by Ruskins to complete a fuller belt-and-braces picture.

The officer is perhaps a little unfortunate in his choice of words: the applicant is not required to **categorically demonstrate the absence of harm**. Rather, the applicant's consultant is required to provide a risk assessment (Arboricultural Impact Assessment), the nature of which is to provide due diligence as opposed to certain knowledge. I would respectfully suggest that the combination of numerous discrete pits and more extensive trenches fulfils the brief. I have not measured for certain, but the pits appear to be as broad as they are deep (800mm+). Seven such pits, should fairly conservatively round out at 6m in length. If you add the 2 x 2m Arboraeration trenches within T5's RPA (TP's 1 & 2), that is a combined total of 10m, though some of this total may comprise shared ground. In all events, a fairly extensive 8-10m linear distance is likely to have been investigated with (both random and systematic sampling). As to the depth, the relevant guidance (British Standards Institute: Trees in relation to design, demolition and construction BS 5837: 2012 HMSO, London) recommends at minimum depth investigations of 600mm:

7.5.2 Root damage can be minimized by using:
• piles, with site investigation used to determine their optimal location whilst avoiding damage to roots important for the stability of the tree, by means of hand tools or compressed air soil displacement, to a minimum depth of 600 mm

In this case, the trenches were dug to below the depth of the footings where roots colonising the site would be expected.

Therefore, it seems fair comment to respond that the applicant has in fact provided the requisite due diligence in commissioning a dual prong / belt-and braces approach of numerous discrete trial pits and continuous trenches rather than one method alone; that their combined total adds up to a significant linear extent, and with a depth exceeding both the minimum recommendations and the footings depth of the boundary wall. Other than a single 110mm diameter plane root found below and seemingly more parallel with than across the footings, no significant plane roots have been found on site to date.

Finally, whilst I don't wish to pour water on the officer's (and our own previous) assessment of the tree's high quality, it should be noted that since our survey the trees have been found to exhibit infection by the fungus *Massaria*. Unfortunately, the treatment for this is generally to hard prune the affected tree in much the same way as has been specified for the adjacent plane trees in the road (please see photo below). Unfortunately, this means the tree's categorization as High Quality / Category A should be reviewed and, in all likelihood, downgraded to Moderate Quality / Category B:

Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the
category A designation.

Photo 1: pollarding / hard pruning of adjacent plane trees in Ellsworthy Road.

I trust the above provides sufficient information at this time.

Yours sincerely

Adam Hollis
MSc Arb MRICS FArborA MICFor C ENV
Registered Consultant
Chartered Surveyor, Forester & Envrionmentalist

Enc. Ruskins Trial Pit Log

Ruskins Trees and Landscapes

54 AVENUE ROAD NW8

ROOT INVESTIGATION

We were instructed by Domvs to excavate pits in the locations marked on the attached annotated plan.

The pit details are below and related images are attached

Pit 1 – Footing of wall at 600mm, then dense London Clay. Building rubble was present throughout trench. No roots were found and there was no disturbance to the foundations

Pit 2 – Top 200mm heavily compacted 1 root 30mm diameter at 100mm, pit 850mm deep. Builders rubble was present throughout the trench.

Pit 3 – Top 200mm heavily compacted, pit 850mm deep. Builders rubble was present throughout the trench, extending towards Elsworthy Road and back into 54 Avenue Road.

Pit 4 – Top 200mm heavily compacted, pit 1000mm deep. Builders rubble was present throughout the trench, extending towards Elsworthy Road and back into 54 Avenue Road.

Pit 5 – Top 200mm heavily compacted, pit 800mm deep. Builders rubble was present throughout the trench, extending towards Elsworthy Road and back into 54 Avenue Road.

Pit 6 – Footing of old house started at 300mm 1 root 60mm diameter at 300mm deep, pit 850mm deep. Builders rubble was present throughout the trench, extending towards Elsworthy Road and back into 54 Avenue Road.

The pits were excavated til dense London Clay was found, which could not be excavated by Air Spades.

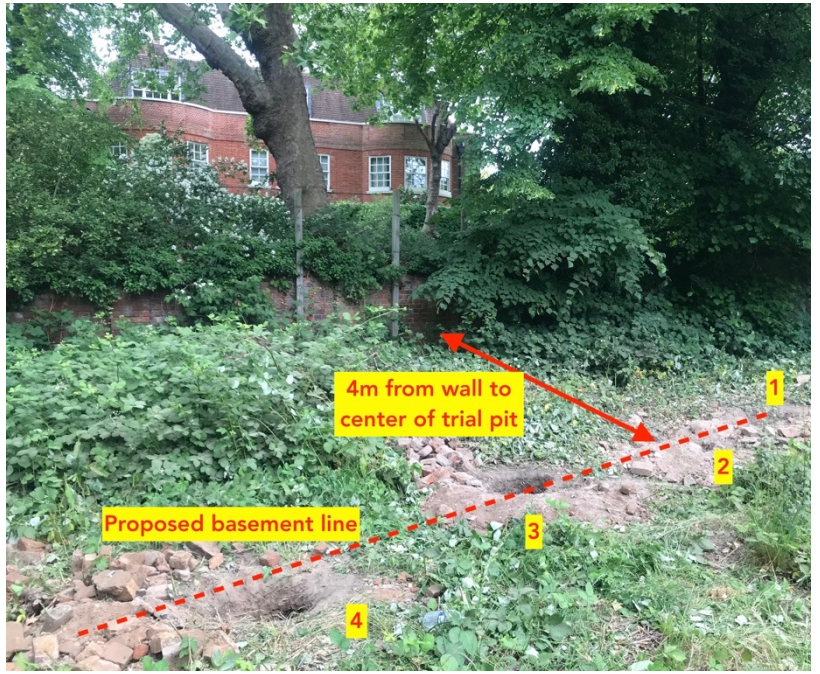
Note: Tree roots can penetrate soil upto where the soil density is such that it is not possible for the root to access. Roots will naturally utilise better soil in preference to poor or dense soils, where this exists.

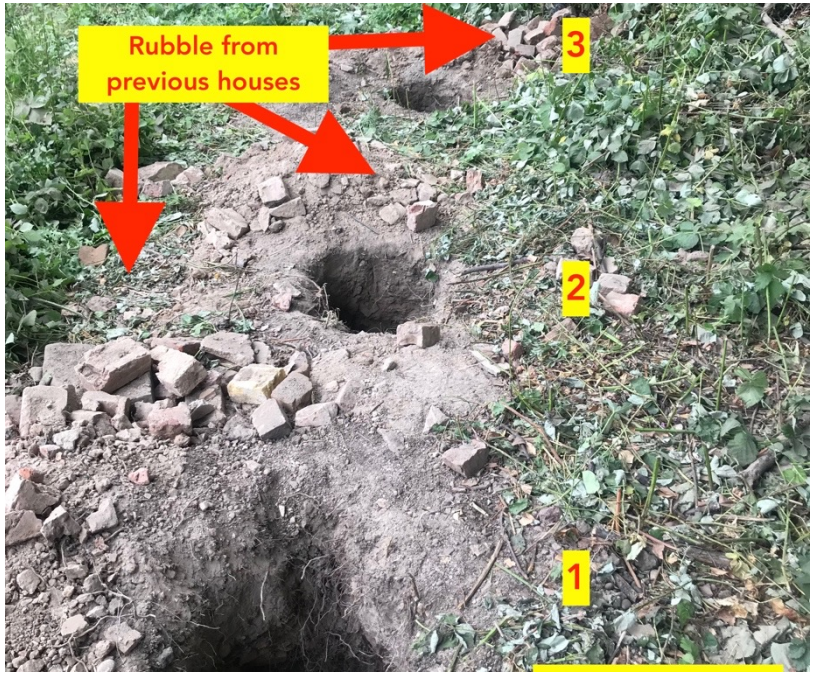
Ruskins Trees & Landscapes Limited 01277 849990 www.ruskins.co.uk mail@ruskins.co.uk

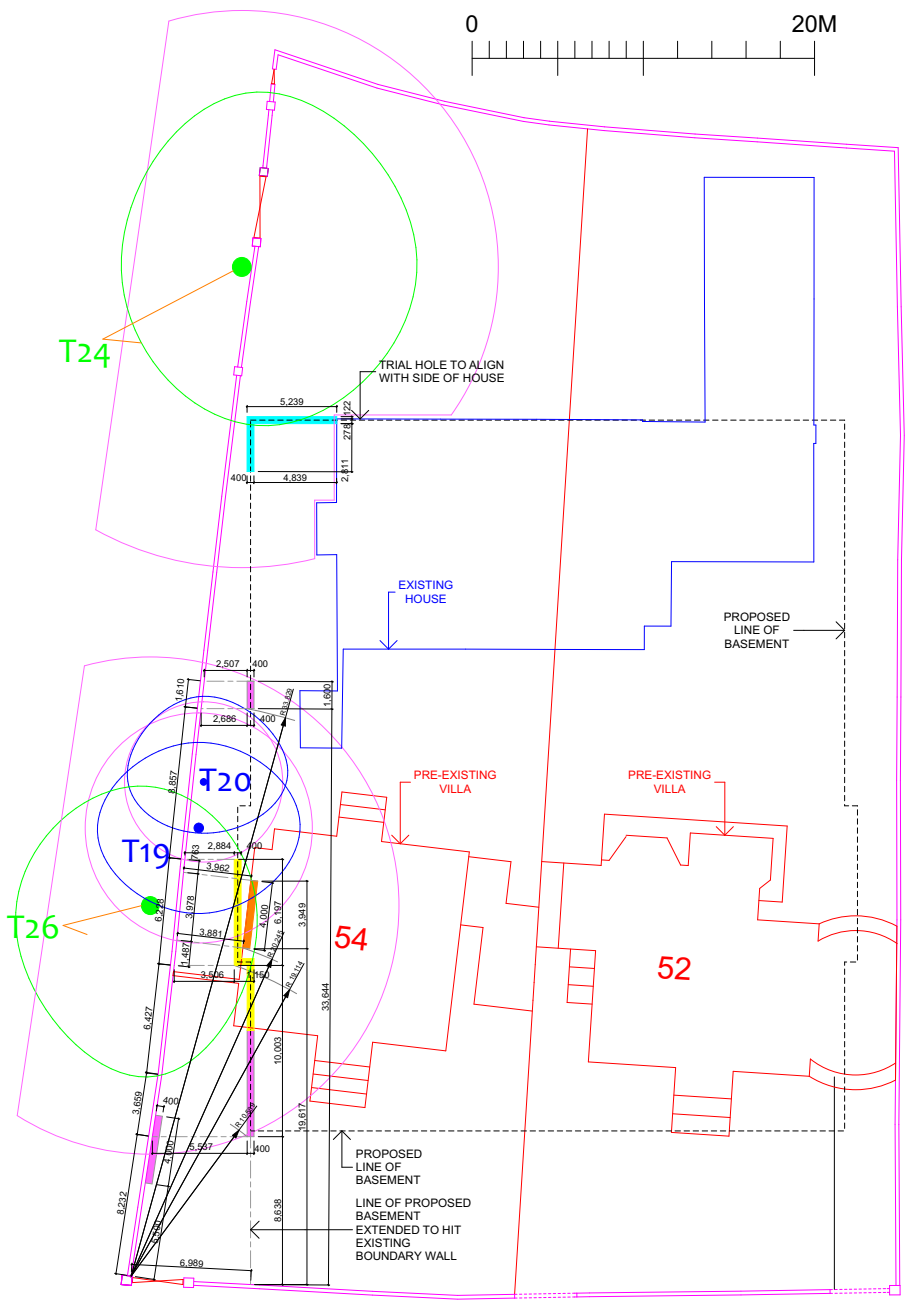
17 March 2021

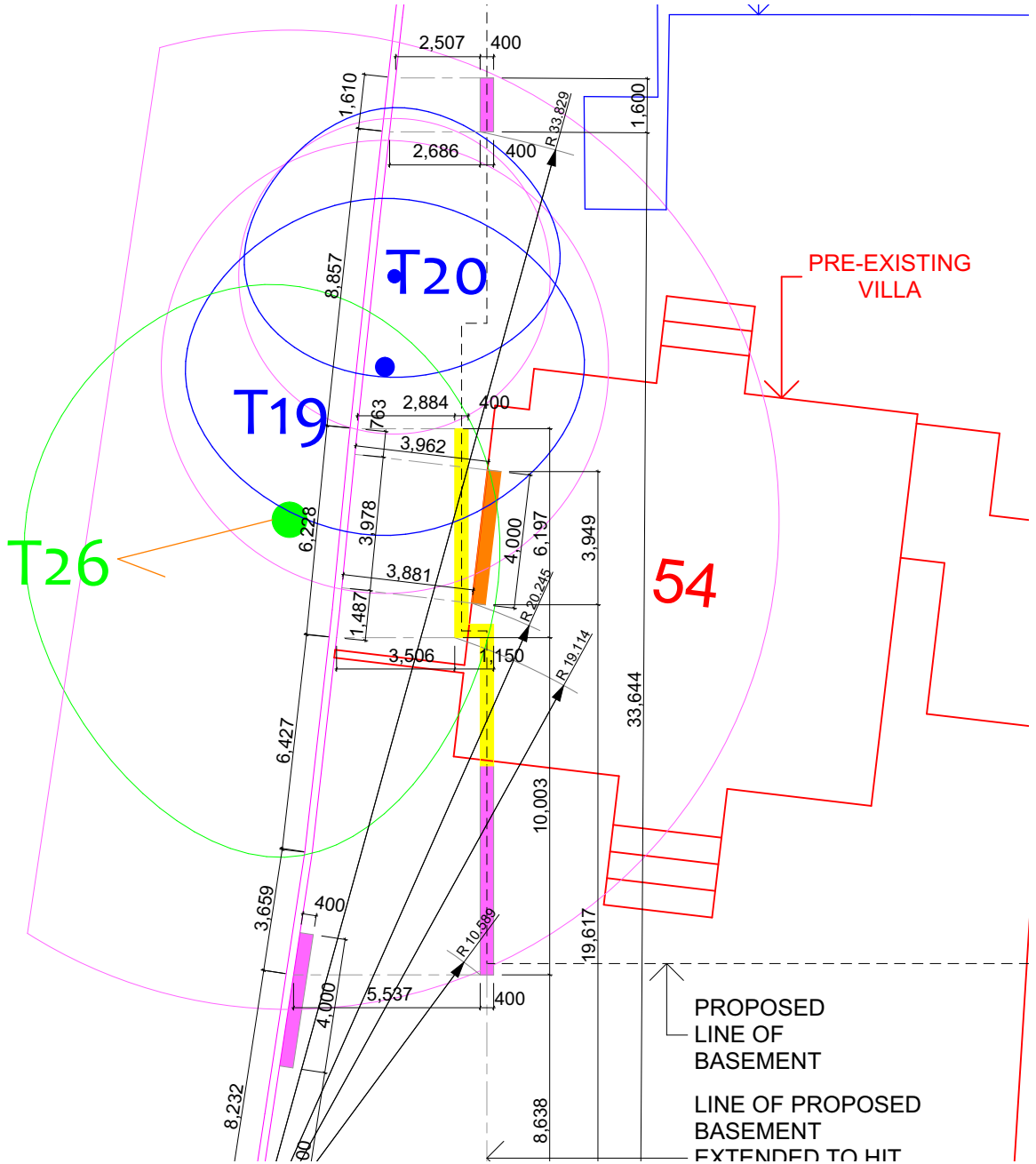

1
2
3
4
5


5
4
Rubble from
previous houses


4m from wall to
center of trial pit
1
2
Proposed basement line
3
4


Rubble from
previous houses
3
2
1





SK010 TRIAL TRENCH LOCATION PLAN 1:100 AT A1