



31 Milton Park, Hornsey, London, N6 5QB

RESPONSE TO COMMENTS RECEIVED FROM HARINGEY BOUROUGH COUNCIL – 07.06.2023

Introduction:

Comments have been received from Haringey Borough Council (HBC) Planning Office regarding arboricultural matters for the proposed development at 31 Milton Park, Hornsey, London, N6 5QB.

Reference should be made to the following corresponding files in relation to this response:

- Tree Protection Plan produced by ACD Environmental Ltd.
(ref: PRI24183-03)
- Arboricultural Impact Assessment & Method Statement produced by ACD Environmental Ltd.
(ref: PRI23183aia_ams)
- Photos of onsite tree stock supplied by ACD Environmental Ltd.
- Scans of trial-pit documents including location plans and findings produced by Integrum Site Services Ltd.
(ref:1445)
- Photos of investigatory excavations supplied by Integrum Site Services Ltd
(see below).

The following document has been produced in order to address concerns raised by Haringey Borough Council in email correspondence received on 07.06.2023. Excerpts from the received correspondence have been included below to allow for adequate context for each response.

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Senior Arboricultural Consultant

12/06/2023

Concerns and responses:

Tree Categorisation

HBC – *“I am familiar with the trees to the rear of these properties. They form a mixed avenue (predominately Lime spp.) of privately owned trees. All have been managed individually overtime and many form high lapsed pollards. Collectively these trees have a high value and add to the sylvan and character of the area. They form part of a green corridor. I find the tree quality classification within the report not accurate, and the trees merit a category B rather than the C that they have been given.”*

ACD – Trees T4 – T8 do form a linear group, including with additional trees further offsite not picked up in the tree survey to the South, however these x5 specimens in particular have all been historically pollarded far lower than all the neighbouring Lime trees to a height of approximately 5m with crowns of circa. 3m regrowth. Although it is conceded that as a collective group feature these trees could be subjectively categorised as ‘B’, these trees have been surveyed as individuals which are significantly sheltered and not widely visible from the public realm due to their much larger neighbouring trees, and therefore have been categorised as ‘C’.



It should also be considered that as none of these trees are proposed for removal as part of the development proposals, therefore there is no loss of amenity that is to be considered in contrast to the BS5837: 2012 categorised value of the tree.

Figure 1(left): photo showing tree T8 (which is similar to adjacent trees T4, T5, T6 & T7) and much larger pollarded specimens which can be seen to the Left-hand side of this photo which are over twice as tall and much more significant.

Root Protection Areas (RPAs)

- HBC – *“Root protection areas (RPAs) have not been notionally offset. There is an assumption that the existing hardstand, basement/ cellar, and foundations might affect the rooting zone and trial trenches are proposed to examine the extent of the roots (T4, T5, and T6 would be affected by the proposal).”*
- ACD – Given the significant amount of existing hard surfacing, building and level differences (which undeniably gives rise to more unfavourable rooting conditions in the areas within the development boundary), coupled with the limited offsite information available on the topographical survey, it is not realistically feasible to offset the RPAs to show a more likely growth pattern of potential root systems in more favourable environments, and as such the standard circular RPA projection has been kept.

It is also considered that if the RPAs were offset from existing development for the most favourable rooting environment in the immediate area, then this would likely show a majority of the RPAs in soft ground located in offsite garden spaces and therefore there would be little to no impacts shown which could potentially impact these amended RPAs and ergo no requirement to specify mitigation or sensitive methodologies as they have been for encroachments into the standard circular RPA which lies within the areas of proposed development.



Figure 2 (left): photo showing existing hardstanding, building and level changes between the offsite tree stems and the proposed area of development which gives rise to unfavourable rooting conditions which will have likely suppressed the development of substantial rooting systems but creates difficulty in amending standard RPAs.

RPA encroachment:

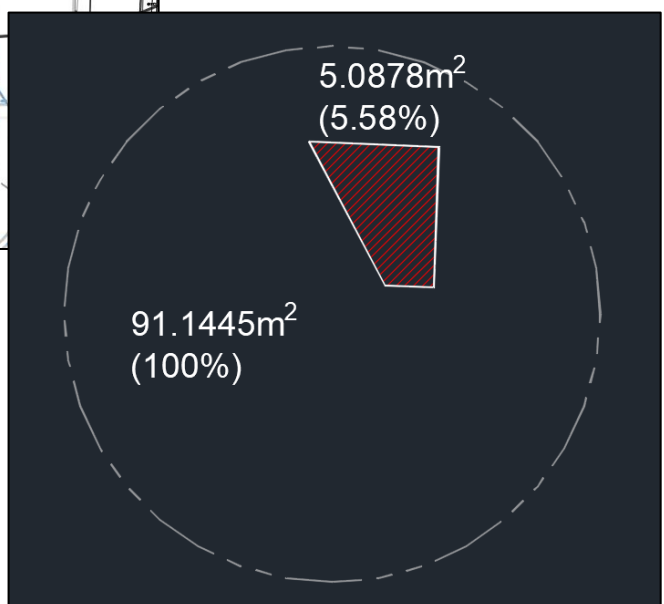
HBC – “No information has been given within the document of the actual percentage encroachment of the new proposed extension into the RPA. From the plans it looks quite extensive.”

ACD – The area of new construction encroachment into the RPA of T5, which sees the biggest relative incursion into its RPA from the proposals, has been measured in AutoCAD as 5.6% of the overall required RPA area as calculated in line with BS5837:2012 for single stemmed trees ($\varnothing \times 12$) – this area of impact would be further reduced if the RPA were to be offset to favourable rooting medium offsite. It is further considered that the area of proposed incursion is within an existing hard surface of cast concrete, with a noticeable drop in ground levels within the development boundary which will have likely suppressed the establishment of rooting systems in this area. For areas of RPA reaching beyond the shown area of impact, the context of development will not be changing (from building construction/foundation) and therefore no additional impact is considered.



Figure 3 (left): Largest area of proposed relative impact within a standard circular RPA where proposed development sees an increase of intensity and change of context from hard surfacing to building foundation

Figure 4 (right): area and relative percentage of the proposed RPA impact .



Foundation Design:

- HBC – *“Foundation design has not been decided due to the proposed trial trenches. However, considering the extent of the encroachment into the RPAs, particularly T5, piling seems the appropriate solution.”*
- ACD – Where the proposed development footprint follows the line of the existing brick building foundations, there should be no need to specify bespoke foundation design as there is not likely to be any significant additional impacts to potential rooting systems in these areas. The findings of x2 recently excavated chambers (“TP1” & “TP2”) show that only minimal rooting presence of >10mm^Ø was found in an area along the proposed area of new foundation line within the RPA of T5 (TP2), and within the existing basement (TP1) where a new staircase is to be installed, a single root of approximately 20mm^Ø was found – this larger root is on the lower threshold of what would be considered a significant root, however it is far from what would be considered a structural root that has an integral role in relation to the overall stability of a tree.

Even with these findings showing reduced rooting presence, sensitive and supervised methodology is to be used in these areas to ensure that if any large roots are found during further excavations, that appropriate steps which have been agreed and approved by Haringey Borough Council can be followed.

Further to this it is also considered that *Tillia sp.* as a species is incredibly tolerant of pruning with considerable ability for fast sealing and regrowth. Pruning of rooting system as represented by the findings of the recent trial pits would be considered to well within the threshold of what a tree of this species could handle and not be of a significant detrimental impact to the ongoing vitality of the trees anymore than the significant ‘pollarding’ regime that they are already subject to.

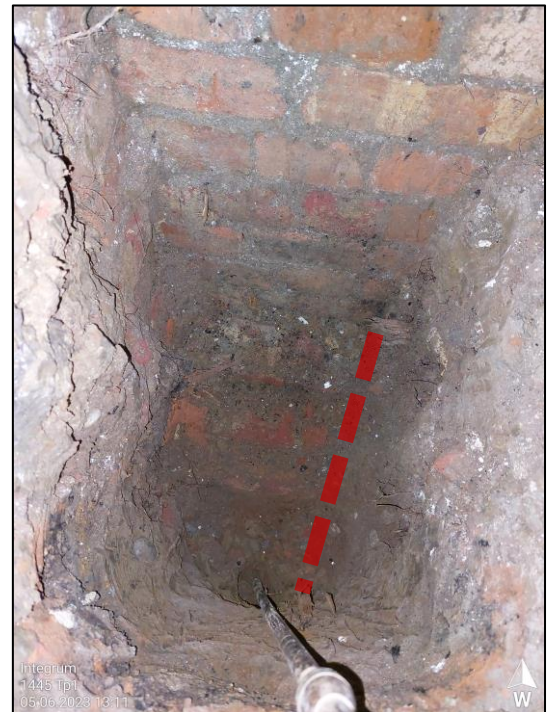


Figure 5 & 6 (above): TP1 with single root of approx. 19mm – 20mm $\varnothing$

Figure 7 & 8 (below): TP2 with sparse multiple small roots <10mm $\varnothing$



Photographs:

HBC – “No photographs to date have been provided.”

ACD –



Figure 9: T9 – Bay tree proposed for removal.



Figure 10: T3 – Ivy smothered Lime tree at the front of the property with a historic cavity in the stem.



Figure 11: T2 – Birch tree located at front of property with cambium damage on stem.



Figure 12: T1 – Cherry tree located at front property with historical cambium damaged on stem