Braintree District Council

**Landscape Services**

Causeway House

Bocking End

Braintree

CM7 9HB

**TO: Development Management**

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| **Ref. No.** | 23/01994/FUL |
| **Proposal** | Demolition of the existing buildings on site, and the erection of a 64no. bed care home (Use Class C2), together with access, car parking, landscaping and associated works.  |
| **Site Address:** | The Woodlands Hotel, Coupals Road, Sturmer, CB9 7UW |
| **Case Officer** | Carol Wallis |
| **Responding Officer** | James Remmington |
| **Date** | 24/05/2024 |

**LANDSCAPE SERVICES ADVICE**

**Statutory or special tree considerations:**

No TPOs at this address

Not within a Conservation Area

**Comments:**

The application includes an Arboricultural Impact Assessment ref: OAS 22-187-AR01 Rev B.

**Tree removals:**

39 individual trees and 14 groups of trees are included within the survey schedule. Of the surveyed trees, the proposal requires the loss of 18 individuals and 6 groups, as well as partial loss of a further 3 groups.

The loss of individual trees amounts to 46% of the total. The groups include large numbers of trees, so the total loss of canopy cover required is substantial, although not quantified. Removals are generally of low quality, with 3 category b individuals (T4,5,12) to be removed and the remainder classed as category C or lower.

**Impacts to retained trees:**

The footprint and foundations of the main development are outside of retained trees Root Protection Areas (RPAs). There is significant encroachment from new surfacing, the level of encroachment is not quantified but, in some instances, e.g. T23, appears significantly higher than the 20% maximum espoused by BS5837:2012. There are also examples, such as T18 & G10 where encroachment could easily be avoided with minor design changes.

There is a general recommendation for extensive "general work" to trees, and mention of construction of “informal paths” but this is not explored in further detail.

There is no detail on new service connections, beyond stating that these are not anticipated to be routed through RPAs.

**Mitigation:**

Compensation for tree loss is stated within the report as being detailed within “*an extensive landscape plan that will also include general works to existing vegetation and trees so as to bring the site back into a reasonable state of management*…” but no such document has been provided. There is a Landscape strategy plan, with indicative detail of new planting, a drawing titled “Car Park Area Detailed Landscape Proposals” showing species and numbers for this area (but lacking detail of planting/aftercare) and there is a landscape management plan for the adjacent village green(outside of the application boundary). None of these documents provide the required detail to show that commensurate replacement tree provision is achievable on site, and likely to successfully establish.

I would point out that new planting should be achieved onsite, within the application red line unless clearly demonstrated as not feasible.

With regard to mitigation for retained trees, it is stated that no dig construction of new surfacing is intended, but there are apparent level changes across site and it is unclear if this is achievable in all instances, this is a significant concern given the concerns with encroachment outlined above.

It is stated that retained trees will be protected via Tree Protection Fencing (TPF) but the line of this fencing shown on plans does not appear to allow sufficient working room

**Conclusion**

The cumulative impacts to trees appear significant. There is substantial loss of trees, albeit of low size and quality, and there is a lack of information to demonstrate that tree loss can be effectively compensated with new planting.

Further, impacts to existing trees involve significant RPA encroachment to several trees, that in several instances are contrary to best practice, with potential for substantial harm. The lack of working room consideration is also a concern – the proposed TPF positioning does not appear viable, and the level of development on site is likely to put pressure on retained trees, as well as any new planting, making the lack of a management plan a significant concern.

Overall, the proposal appears to be overdevelopment of the site in arboricultural terms, the layout does not appear to have been designed sympathetic to trees, and the proposal is likely to result in significant arboricultural harm. The detail on proposed mitigation does not allow confidence that this level of harm can be reduced to acceptable levels.

Further to the above, I note that a biodiverse green roof is proposed, but no detail is provided. Such a roof required careful design and maintenance considerations to ensure that it is successful, so it is a concern that no further information is provided.

**As such Landscape Services object to the application in its current form – ideally design changes will be explored, and significant further information will need to be provided.**