



Manor Road / Richmond

Addendum Arboricultural Report

ACS (Trees) Consulting

July 2020

Addendum Arboricultural Report		Prepared by:	Hal Appleyard Dip. Arb(RFS), F. Arbor.A MICFor, RC Arbor A
Project:	Former Homebase Site, Manor Road, Richmond	Produced for:	Avison Young
Date: 29th July 2020	Ref: ha/an2/mr/2020		
Planning Ref:			

1.0 Introduction and Scope

1.1 This Addendum Arboricultural Report has been prepared by Hal Appleyard of ACS (Trees) Consulting on behalf of Avanton Richmond Development Ltd ('the Applicant') following further amendments to the proposed scheme for the redevelopment of the Homebase store at 84 Manor Road, North Sheen ('the Site'). A planning application for the redevelopment of the Site was submitted to London Borough of Richmond Upon Thames (LBRuT) in February 2019 (ref. 19/0510/FUL) (the 'Original Proposed Development'), and was considered at LBRuT Planning Committee on 3 July 2019. The Planning Committee resolved that they were minded to refuse the Application, however on 29 July 2019 it was confirmed that the Mayor of London would act as the local planning authority for the purposes of determining the application.

1.2 Proposed Amendments

1.3 Following review of LBRuT's reasons for refusal and discussions with Officers at the Greater London Authority (GLA) and Transport for London (TfL), the Applicant sought to review the scheme, with the principle aim of increasing the delivery of affordable housing through additional density and addressing other issues raised in the Mayor's Stage 2 Report. Initial scheme amendments were submitted in November 2019 ('the November 2019 Amendments') and increased the overall number of units by 48, primarily through the introduction of a new residential building known as Block E.

1.4 Following further discussions with TfL and the GLA, it was subsequently agreed that further revisions should be explored in order to deliver an improved scheme, without the need for this additional block.

1.5 The proposed changes are described in detail in the accompanying Design and Access Statement Addendum, however, of particular note is the increase in residential units from 385 within the Original Proposed Development to 453 within the Amended Proposed Development. This increases the total number of affordable units by 39 to a total of 173 affordable homes (40% by habitable room taking account of grant funding, increased from 35% as originally submitted). This

increase in units and the higher affordable housing provision has been principally achieved through amendments to the height and internal layout in appropriate locations across the Site.

- 1.6 The proposed changes necessitate an amendment to the Application's description of development. The revised description of development (hereafter referred to as the 'Amended Proposed Development') is as follows:

'Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.'

- 1.7 As a result of the proposed changes, this Arboricultural Report has been prepared to identify and assess the Amended Proposed Development in respect of arboricultural matters. By way of summary:

The Amended Proposed Development removes no more trees than the Original Proposed Development (February 2019 scheme).

The Amended Proposed Development provides a substantial increase in numbers of new tree planting from 113 trees in the Original Proposed Development to 141 new trees in this design.

- 1.8 The Original Proposed Development was supported by my arboricultural impact assessment report reference ha/aiaams5/19/manorrd dated 6th February 2019.
- 1.9 This addendum report, identifies the differences of the arboricultural impacts and is to be read in conjunction with the earlier report reference ha/aiaams5/19/manorrd dated 6th February 2019.

2.0 The Arboricultural Impacts

- 2.1 At Appendix 1 are the two ground floor layouts, the Original Proposed Development layout and that of the Amended Proposed Development (June 2020 scheme). These plans are relevant in terms of trees and arboricultural impacts.
- 2.2 The primary difference between the two schemes is the omission of the former Block E located at the northern point of the site. The Amended Proposed Development reflects the Original Development design.
- 2.3 The omission of the block means that currently existing trees can now be **retained**, and further trees can be planted in this area. In the table, below I set out the quantity of the trees to be removed and planted both in the February 2019 scheme and that of the current scheme.

Table 1

	Original Proposed Development	Amended Proposed Development	Difference	Impact
Nos trees removed	38	38	0	Neutral
Nos trees planted	113	141	28	Positive
Total	75	103	28	Positive

3.0 Trees and Planning Policy

- 3.1 Upon review of the scheme, I have had due consideration to the latest national, regional and local plan policies with regard to trees and woodlands, particularly:

i) NPPF 2019

‘15. Conserving and enhancing the natural environment

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

Response:

The proposals comply with the above plan policy because it seeks to both protect and enhance the landscape (trees) by retaining established trees where possible and by substantially increasing the number of trees (from 64 to 141), which is a net gain of 28 (reference items a), b) d)).

ii) Policy 7.21 'Trees and woodlands' of London Plan 2016

'Strategic

A - Trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework (or any successor strategy). In collaboration with the Forestry Commission the Mayor has produced supplementary guidance on Tree Strategies to guide each borough's production of a Tree Strategy covering the audit, protection, planting and management of trees and woodland. This should be linked to a green infrastructure strategy.

Planning decisions

B - Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree'. Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.

LDF preparation

C - Boroughs should follow the advice of paragraph 118 of the NPPF to protect 'veteran' trees and ancient woodland where these are not already part of a protected site.

D - Boroughs should develop appropriate policies to implement their borough tree strategy.'

Response:

The Amended Proposed Development complies with the above policy in relation to planning decisions because those trees of moderate value are to be replaced and by careful species and size tree selection to ensure that the right tree is identified for its role in and sustainable contribution to the landscape. Specialist landscape architects have drawn up robust revised landscape planting plans, which include the provision of 13 streetscape (large) trees 6 feature (large) trees and 122

medium-sized trees, throughout the design. There are no veteran trees or ancient woodlands in or near the development site.

iii) Policy G7 Trees and woodlands of the draft London Plan 2019 (July)

A - Trees London's urban forest and woodlands should be protected, and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

B - In their Development Plans, boroughs should:

1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site^{107A}

2) identify opportunities for tree planting in strategic locations.

C - Development proposals should ensure that, wherever possible, existing trees of quality value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, itree or CAVAT or other appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Response:

The development project complies with the above policy also because the existing tree stock is generally poor. Having been planted 25-26 years ago the trees are small and weak having grown only marginally since planting. The proposals seek to provide new, vigorous trees planted in contemporary manner to allow the full development of canopies for a significant improvement to the extent of canopy cover currently provided by the tree stock.

iv) Policy LP16 of LBRuT Local Plan 'Trees, Woodland and Landscape'

A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;
2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;

3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);
4. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;
5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).

Response:

The development project complies with this local plan policy because; the individual trees, which are identified for removal, are of little or no amenity value; the proposals do not affect veteran or ancient trees; the proposals do not affect retained trees of amenity contribution; the proposals include trees located at sustainable locations and; the proposals include a significant enhancement to the existing tree stock both in numbers (approx. 110% increase) and canopy cover. No off-site tree contribution is necessary because adequate space has been provided for an increase in the tree stock within the development.

3.2 Analysis

- 3.2.1 It is made clear in national (NPPF), regional (London Plan 2016 + emerging draft new London Plan 2019) and local (LBRuT Local Plan) Policies, that new development is, where it is appropriate, to assess, plan for, protect and preserve trees and woodlands, and developments are to make provision of effective landscaping to incorporate new and replacement trees in order to sustain the green infrastructure of the locality.
- 3.2.2 Significant provisions for new trees and additional soft landscaping, forms and integral part of the Amended Development Proposals. 141 new trees are proposed to be planted throughout the site, which is an increase to that of the former iteration by 28 trees. The trees are proposed in locations where no trees currently exist, toward the southern part of the site for example. Coupled with protection of the retained on and off-site trees (those which are included in the surveys), the proposals meet the objectives of the policies by protecting and enhancing the quality of the landscape.

- 3.2.3 With respect to item 3 of Policy LP16, the Amended Proposed Development provides for both replacement trees the planting of an 99 additional trees. 22 trees are retained and protected. There will be a 40% net increase in tree numbers across the site to that which currently exists. I conclude, owing to the expected and planned increase in tree quantity, quality and canopy cover to that which currently exists, that a Capital Asset Valuation System (CAVAT) assessment is not required for this project.
- 3.2.4 With reference to the original arboricultural impact assessment report (February 2019), the quality of the trees is generally low to poor with a few exceptions, which are of moderate quality (e.g. T15, T19, T24, T26, T28, T38, T39, T40, T53 and T54), where trees have grown more evenly and/or slightly larger. The removal of the existing trees and redevelopment of the site provides an opportunity to install new trees with better prospects of development by using modern planting techniques, larger tree stock at the time of planting and a much wider and more interesting pallet of species. A tree planting and landscaping scheme, which provides ecological and other amenity benefits will be a positive contribution to the landscape and area in general, both at the time of planting and for the long term. Under these circumstances, I conclude the proposals comply with all relevant plan policies.

4.0 Summary and Conclusions

- 4.1 I have reviewed the tree stock and proposed development plans and it is clear that much of the current tree stock will be replaced as a necessity of the construction designs. However, the trees currently growing within and adjacent the site, are of low to poor quality with the exception of twelve individual trees from sixty-four recorded, which are of moderate quality and landscape contribution. There are no high-quality trees. All forty-two trees included in TPO Area 2, of which nine are of moderate quality, thirty are of low quality and three are of very poor quality and which should be removed irrespective of development.
- 4.2 An integral part of the proposal is to include the planting of one hundred and forty-one interesting and diverse new trees, coupled with the protection and preservation of twenty-four individual trees and small tree groups. This in not only

an increase in tree stock to that which currently exists this is an increased quantity to new trees to that of the previous development proposal.

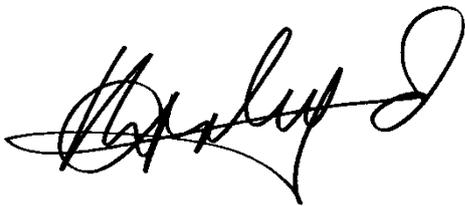
- 4.3 The Amended Proposed Development complies with national, regional and local development plan policies, designed to protect and enhance the quality of the green infrastructure in the context of new development. This project increases the tree stock by through the planting of ninety-nine additional individuals. Additional and improved soft landscaped areas of low-level planting is to be included also.
- 4.4 Although the Amended Proposed Development requires the removal of protected trees, these trees are of moderate to poor quality and with little prospect of ever making a significant contribution to the local landscape, owing to the low-quality planting techniques adopted at that time. This Amended Proposed Development will be able include the installation of new trees using modern planting materials and techniques, which provide optimum conditions for proper and full tree development. As such, the scheme makes a positive impact and contribution to the local landscape.

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Please note that all relevant planning approvals and approval to planning conditions must first have been issued by the relevant planning authority in order for this report to become effective. We strongly advise that you consult your planning advisors before implementing any recommendations set out in this report.

Hal Appleyard
Date: 24th July 2020



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Appendices
1 – Site layout plans

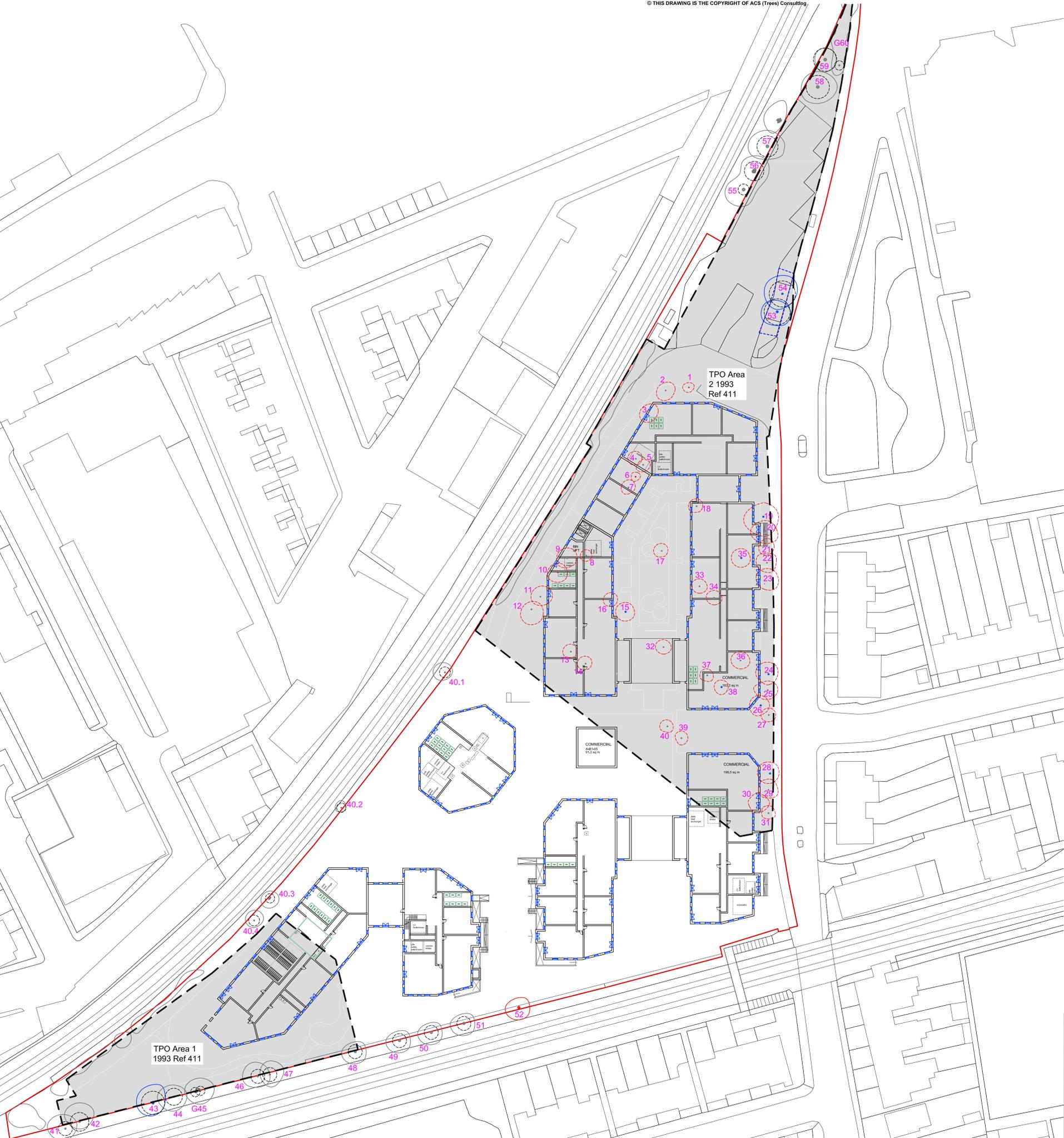
APPENDIX 1

ACS (Trees) Consulting LEGEND

- BS Root Protection Area (RPA) shown uniform but site features such as roadways, retaining walls and foundations, may modify root patterns and therefore the position of the RPA.
- A grade trees
- B grade trees
- C grade trees
- U grade trees
- Trees to be removed/replaced
- Approximate position/outline of Area TPO. Trees within this area are protected by the TPO 411.
- Position of tree protection barriers, which denote a construction exclusion zone for the duration of the project.

Tree Management Methods to be adopted on site.

1. Undertake pre-commencement site meeting to agree tree protection methods and timings.
2. Carry out any agreed tree work (check for authority before beginning)
3. Install all tree protection (see Appendix 3).
4. Undertake the demolition work and ground works.
5. Construction phase.
6. Remove tree protection and carry out landscaping.



Client: Avanton Richmond Development Ltd		ACS (Trees) Consulting Consultants in the Management of Trees and Woodlands	
Project: Homebase, Manor Road Richmond		Tree Tops 2 Redwood Mount Reigate Surrey RH2 9NB TEL: 01737 244819 Mobile: 07770 820 105	
Title: Tree Survey, Removal and Protection Plan		ALSO AT: Office Eighty Five 272 Kensington High Street London W8 6ND	
Scale: 1: 250 A1	Dwg No.: TPP1_MR	Rev.: -	www.acstrees.co.uk
Date: Dec. 2018		Do not scale from this drawing. Any discrepancies are to be reported to ACS (Trees) Consulting. This drawing is to be used when printed to scale & in colour.	



rev	details	by	date
00	For information	AP	07.11.2018
01	For Planning	AP	29.01.2019
02	Inclusion of play areas	AP	28.03.2019
03	Revised play areas	GP	16.04.2019
04	Revised tree planting	GP	08.05.2019
05	Updated for addendum submission	PC	22.11.2019
06	Updated to revised Block 5 design	GP	09.01.2020

DRAFT - WORK IN PROGRESS 13.07.2020

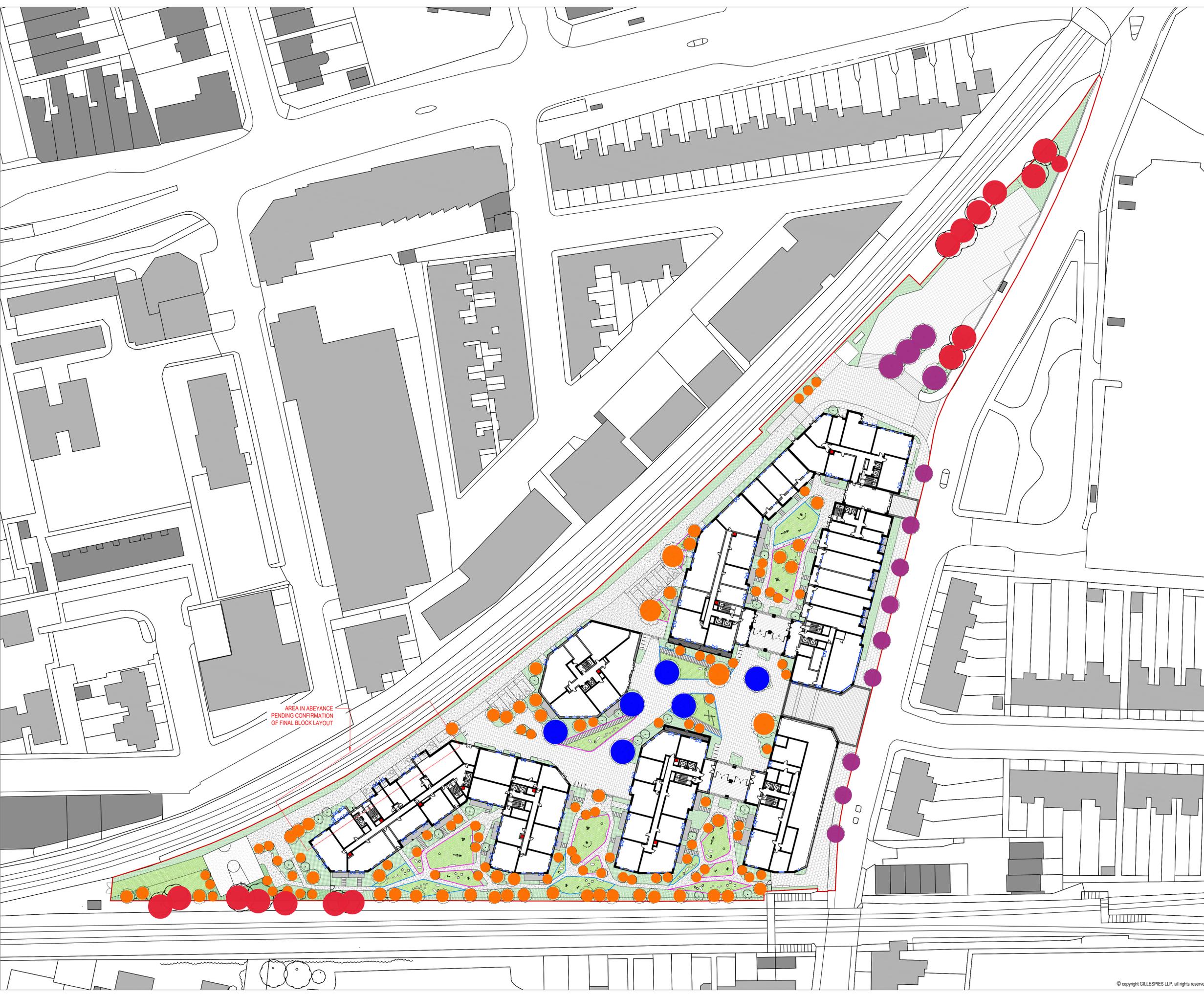
Notes

- 1.0 Do not scale from drawing, use figured dimensions only
- 1.1 All dimensions to be checked onsite
- 1.2 This drawing to be read in conjunction with all other Gillespies drawings and specifications

GENERAL

- Concrete flags
- Granite paving with frame
- Granite slabs
- Granite setts
- Permeable asphalt
- Resin bound paving
- High quality concrete block paving
- Private terraces
- Reinforced grass
- Existing paving retained
- Stepping stones
- Seating elements
- Play elements
- 2.4m Height Gates and Fences
- Proposed timber fence infill
- 2.4m max brick screen wall
- Cycle stands
- Lawn
- Proposed planting
- Existing Trees
- Proposed Trees
- Planning Boundary
- 0-4 Play space
Total: 721m²
- 5-11 Play space
Total: 505m²

- streetscape trees - 13no.
- feature trees - 6no.
- mix of medium sized trees - 122no.
- existing retained



Project title			
Manor Road Richmond			
Drawing title			
Landscape General Arrangement			
Drawing status	1:500 @ A1	Scale	Drawn GP
	07.11.2018	Date	Checked RC
Drawing number	P11559-00-001-100	Revision	06
	Client		
DRAFT			Avaton
58 Queen Anne Street, Lutton, W1G 8JA			

GILLESPIES