

F/25/98831 - Boundary Acre, Bursledon

16/04/2025

Dear David,

Arboricultural Documents

- Arboricultural Impact Assessment and Method Statement reference DS/19924/SC
- Tree Constraints Plan with Pre-Application Comments

Introduction

The site is a wooded area of land to the west of Boundary Acre. The site slopes down to the southwest and contains a number of significant trees. The entire site is subject to a Tree Preservation Order, which was made in 2021.

At pre-app (2023) we raised strong concerns regarding the site and its ability to accommodate a residential dwelling. Whilst more arboricultural information has been provided, we still have the following concerns (in no particular order of significance).

The Veteran Tree – T1

T1 – an English oak – is categorised as A3 (a tree of “significant conservation...value (e.g. veteran trees...)”). Information submitted by the applicant at pre-app used the term “veteran” several times. It also gave a 15m radius Root Protection Area (RPA) – the cap for the RPA in British Standard 5837 – presumably as a precautionary approach.

The submitted arboricultural report with this full planning application shows a reduced RPA – one that is neither precautionary or in line with the tree’s veteran status. However, Governmental standing advice is that veteran trees are given a RPA with a radius of 15 times the diameter of its stem, or 5m beyond the tree’s canopy, whichever is greater. This enlarged RPA also acts as a buffer.

Whilst the proposed dwelling is outside of the RPA/buffer, the area within the RPA/buffer is proposed to be residential garden. Governmental standing advice states the LPA should not approve development proposals, including gardens, within the buffer zone. Further, the proposed work to make the levels and topography work could influence this RPA/buffer via hydrological changes.

Therefore, we raise an arboricultural objection to the proposals because the proposals are contrary to the NPPF (para 193c); Local Plan policy DM1; and Governmental standing advice. As well as conflicting with advice from DEFRA and the Forestry Commission (Keepers of Time - A Statement of Policy for England’s Ancient and Native Woodland), and the Woodland Trust (Planning for Ancient Woodland - Planners’ Manual for Ancient Woodland and Veteran Trees).

Levels and Topography

We retain our concerns regarding levels and topography in general. Whilst the report correctly states that: “Apart from T3, the only live trees affected by the building footprint are the young sycamores on the eastern slope, T25g,” we do not consider that adequate information has been provided regarding the overall construction activities and access, and the installation of the necessary retaining structures.

Overall Tree Loss

There are a number of B category trees that are either proposed for removal or impacted by the proposed development, including for the double garage. Further, where pruning is a requirement (e.g. T3), the proposal does not take full and proper account of the context of the site (policy DM1c). The trees and Development SPD also states that layouts must be designed to ensure that retained trees are able to grow and mature in the space provided (i.e. without the requirement for pruning).

Replacement Tree Planting

We do not believe the site has the ability to accommodate the necessary replacement trees required under the Tree Replacement Policy. Certainly no proposal has been provided at this stage.

Dominance and Shading

We have concerns regarding dominance and shading over a residential dwelling and, most critically, recreation space.

Surface Water Drainage

Finally, we note the Ecology response regarding the absence of surface water drainage proposals. The requirement for surface water drainage elements, such as soakaways, have not been adequately addressed. These elements can adversely impact trees both via changes in hydrology and through the engineering required to achieve them. Further, the suggested location of a possible soakaway, as shown in the Tree Protection Plan, would potentially require significant engineering work given the topography, which has not been addressed.

Summary

For the reasons stated above, we raise an arboricultural objection to the proposal. The proposals are contrary to policy DM1; the Trees and Development SPD; and, variously, Governmental standing advice, the NPPF, policy DM6, and advice from other relevant bodies.