

# **Written Statement**

On behalf of RC Claringbould & Sons (Site Promoters)
To the Examination of the Dover District Local Plan to 2040 (Regulation 19 draft)

in relation to Land to the West of Townsend Farm Road, Saint Margaret's at Cliffe (STM007/STM008) and Policy SAP39

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### 1. Introduction

- 1.1. This Statement is submitted to the Examination of Dover's Regulation 19 Submission Plan in relation to Policy SAP39 land to the west of Townsend Farm Road, St Margaret's-at-Cliffe. This Statement is submitted on behalf of the owners (and probable developers) of the allocation site R.C. Claringbould & Sons and seeks to demonstrate, to the Examination, that the retention of the allocation within the Plan would render it sound when assessed against The Framework at Paragraph 35.
- 1.2. In **Section 2** of this statement, and in consideration of The Framework at paragraphs 35, 68(a) and 74, we confirm the status of the site.
- 1.3. At **Section 3** we provide the Representators' views following consideration of the Inspectors' Matters, Issues and Questions to the Council (ED14) and in relevance to this site and the allocation generally.
- 1.4. We address issues raised by those parties making representations as part of the Regulation 19 consultation process (SD04b) at **Section 4**.
- 1.5. At **Section 5** we set out our conclusions.

# 2. Site STM007/STM008 – Land to the West of Townsend Farm Road, St Margaret's at Cliffe and Policy SAP39.

2.1. The draft allocation under Policy SAP39 comprises one site albeit that two separate land parcels were submitted as part of the Council's 'Call for Sites' process (hence the two site references). The entire allocation is within the ownership of the Representors and one family ownership.



Fig.1 – Extract from the Local Plan Policies Map (SD02) showing the extent of sites STM007 and STM008 comprising the SAP39 allocation.

# **Draft Policy SAP39**

- 2.2. Representations were made, as part of the Regulation 19 consultation process, confirming the availability (and deliverability) of the site at that time and supporting the overarching provisions of draft Policy SAP39. However, it was suggested, as part of that representation, that draft criterion (e) requiring a provision of localised widening to Townsend Farm Road and the reconfiguration of the existing highway junction with Ash Grove was too prescriptive for the Policy itself and without the benefit of detailed highway design work.
- 2.3. However, the Representors remain committed to the deliverability of the site for housing, and to ensure that a future development is delivered safely and so confirm the ability to meet with the criteria as set out in the policy. In this regard, the Representors confirm that as the entire allocation site is within their ownership, the various requirements of the policy can be met without recourse to any third party land owner.

# **Phasing and Trajectory**

2.4. It is of note that the housing trajectory as attached to the submission plan (SD01) at Appendix D – Local Plan Housing Supply Position and Trajectory, shows the allocation site coming forward in years 5 and 6 i.e. 2026-2028. Given the need to consider the offsite highway works (and thereby carry out a preapplication consultation exercise with the County Highway Authority), design a scheme that duly considers neighbouring heritage assets and, thereafter, seeks the views of the local community as part of a consultation exercise, it is the Representors' submission that the suggested phasing as set out in the plan is appropriate.

# 3. Inspectors' Matters, Issues and Questions

3.1. The Inspectors published Version 1 of their Matters, Issues and Questions (ED14) in August 2023, following the receipt of the Council's response (ED5) to their initial questions (ED4) in May 2023.

# Matter 2, Issue 2 - Settlement Hierarchy

- 3.2. The Representors support the identification of St. Margaret's-at-Cliffe as a Local Centre being one of the larger villages within the district capable of accommodating growth at a scale that would reinforce the settlement's role, providing services for the local rural area. Indeed, it is evident from an assessment of the 2022 Rural Settlement Hierarchy and Confines Topic Paper (HEB03) that St. Margaret's-at-Cliffe provides a sustainable location with the rural area that would benefit from additional homes helping to sustain local shops/services in line with The Framework at paragraph 84.
- 3.3. In consideration of Draft Policy SP3 and, in particular, the fourth paragraph of the policy advising that development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, then the inclusion of the settlement hierarchy within the Reasoned Justification or preamble to the policy would ensure that Policy SP3 is effective. When we further consider the relevant provisions of Draft Policy SP4 (Residential Windfall) development (as potentially amended by minor modifications) and when considering that the settlement hierarchy would appear to have been cited within draft policy SP4, inclusion of the settlement hierarchy within Reasoned Justification at section 3 would appear sensible in moving potential ambiguity for the decision making process.
- 3.4. The Inspectors' Matters, Issues and Questions document (ED14) asks three specific questions with regard to land west of Townsend Farm Road and whilst it is acknowledged that Qu.1, relating to the allocation of the site itself will be a matter for the Council, it is hoped that the following will assist the Examination.

# Matter 3, Issue 2 - Policy SAP39 - West of Townsend Farm Road

3.5. A section of the site is located outside of the Kent Downs AONB albeit aligned to the very edge with the western section of the site located just within, and to the edge of, the AONB.



Fig.1 – Extract from Kent Downs AONB aerial view showing the extent of the AONB.1

<sup>&</sup>lt;sup>1</sup> www.arcgis.com

3.6. Historically the site has been used solely for horse and donkey grazing albeit that, for many years, part of the site was used as an external storage area for building materials/aggregate during the construction of Ash Grove and associated highway infrastructure.



Fig.2 Aerial view of the site in context Google © 2023

- 3.7. Located directly behind the historic built form of St Margaret's fronting the High Street, development along Townsend Farm Road, including the relatively new housing development at Meadow View, extends south-westwards to Ash Grove, a former Exception Site located on land gifted to the community by the Representors. It is submitted that the development of this relatively flat site, bordered on two sides by the existing built form of St. Margaret's at Cliffe and to the north side by Dover Road (and a public right of way) would provide a 'rounding off' established development-indepth in this part of the village; reflecting the character and pattern of development along Townsend Farm Road, Well Lane and Vicarage Lane to the west of the High Street, and the development extending north eastwards along minor residential roads to Chapel Lane to the east side of the High Street.
- 3.8. It is of note that the landscape sensitivity assessment (2021) (GEB11) identifies the site as having a low sensitivity given its location in close proximity to the built environs and owing to the very few distinctive landscape characteristics. In this regard, those trees on site have been recently surveyed and have been found to either be of extremely poor quality or dying/dead. A tree survey and report, as prepared by Invicta Arboriculture, is attached at **Appendix 1**.

3.9. It is also of note that Core Document GEB11 highlights that the site provides no important separation function between the settlement and other land uses and/or landscape features, providing a "lower susceptibility" in terms of landscape impacts. Given that it is bordered on two sides by existing built form and a highway on the other, and given the topographical changes in the open countryside and land as it rises to the west and northwest, the site is generally very well 'contained' within the village envelope. As such the Representors concur with the Landscape Sensitivity Assessment's conclusion that:

"The site is generally able to accommodate residential development without significant landscape/visual change, or in some cases, development (with appropriate design and mitigation) might enhance the landscape. In either case development could potentially relate well to the area."

- 3.10. Having regard to the Inspectors' first question, it is this submission that development of the site provides the potential to improve the visual amenities of the area and with the Representors also owning land immediately adjoining the allocation site (to the southwest) the potential to incorporate additional green infrastructure; both to soften the southwest boundary of the development and create biodiversity corridors would further provide benefits to the AONB; both visually and in terms of enhancing biodiversity.
- 3.11. It is of note that the Kent Downs AONB unit (Representor ID SDLP266) considers the Plan sound given that "...the site is relatively well contained within the wider landscape and relates well to the existing settlement. The proposed requirements included in criteria (a) and (b) to help manage impacts on the AONB are supported."

### Question 2 - Vehicular and Pedestrian Access

- 3.12. Part of Townsend Farm Road is adopted and in the ownership of Kent County Council. The remainder is within the ownership of the Representors and this private land ownership extends along the southern section of Townsend Farm Road to Ash Grove.
- 3.13. The Representors acknowledge that development of the site provides an opportunity to improve vehicular access along this part of Townsend Farm Road together with junction improvements at the point that it meets Ash Grove. The draft Policy's requirement for "pram crossings" means, it is assumed, dropped curves/tactile paving to the junction of Townsend Farm Road with the High Street all of which can be considered under a Section 278 agreement and incorporated within a Section 106 obligation. Certainly with a pedestrian refuge/footway extending south westwards along Townsend Farm Road from the High Street (east side), the development can potentially facilitate a crossing point perhaps by way of buildout (which could act as a traffic calming measure) to further assist the junction design with Ash Grove. Certainly, there are a number of design solutions/measures that would facilitate safe access for pedestrians of both the future development and those existing residents in Ash Grove and Meadow View to the centre of the village and its amenities and public transport links.<sup>2</sup>

## Question 3 - Minor Modifications to Policy SAP39

3.14. The Representors acknowledge and accept the draft Policy requirement to connect the site with the adjoining public right of way which would potentially afford better access for walkers/dog walkers albeit that this footpath ER32 does not provide a continuous pedestrian link to Guston or shops/facilities at Whitfield. Having regard to the Council's minor modifications to the Policy (SD06), and whilst accepting that the required "improvements" to the PROW may present an opportunity, for

<sup>&</sup>lt;sup>2</sup> Bus stops are located at the junction of Townsend Farm Road with the High Street.

- example, to install a wide gate or perhaps furniture such as a dog waste bin, clarification of what "improvements" are meant would render the Policy more effective than it would otherwise be if the minor modifications as proposed were to be included within the adopted plan.
- 3.15. With the Representors retaining ownership of part of the existing highway and of land extending to the southwest of the allocation site (including land in and around the junction with Ash Grove), and with land ownership also extending to (and including) the Public Right of Way running alongside the site, it is this submission that a future development can bring about quite extensive benefits both for future occupants and those existing residents in terms of safe pedestrian and vehicular access to the village. Alongside this, the development of the site would provide the potential for significant improvements to the visual amenities of the locality including the provision of additional green infrastructure, enhancing the setting of the surrounding AONB.

# 4. The Representors' Response to Regulation 19 Representations

- 4.1. It is acknowledged that a number of representations have been made in relation to Policy SAP39 and as part of the Regulation 19 consultation process. It is however noted that some representations purporting to provide objections to draft Policy SAP39 in fact relate to other sites promoted by the Regulation 19 draft plan particularly land at the Droveway.
- 4.2. Nevertheless, in seeking to address the representations made with regard to this site, we advise the Inspectors as follows:

# Highway/Transportation Infrastructure

4.3. Ash Grove was an *Exemption Site* long before Meadow View was built out and indeed was a development constructed on land, gifted by the land promoters, to the village in order to provide affordable housing. As confirmed above, the Representors retain ownership and control of this section of Townsend Farm Road and land adjoining Ash Grove and would, therefore, be in a position to consider highway infrastructure improvements following (as suggested above) consideration of a suitable engineering solution. In addition, sufficient parking would be provided by the development (dedicated and visitor) to meet the County and District Councils' requirements.

# **Drainage and Flood Risk**

4.4. The Representors support the relevant criterion within the draft Policy requiring appropriate investigation of surface water flooding issues and, therefore, a scheme that would potentially bring about benefits to the wider community in addition to the delivery of a suitably designed system to accommodate a new development.

# **Biodiversity and Trees**

4.5. Given that the site is regularly used for horse and donkey grazing, the biodiversity interests of the site would, it is believed, be restricted to the field edges and potentially those existing trees on site. With the Representors owning land adjoining the draft allocation site, there is significant potential to enhance the biodiversity interests of the locality. With regard to tree impacts, and as evidenced, the Representors have investigated the health and well-being of trees on site and whilst retention is often desirable, there is scope here for additional tree planting for the longer term.

### Archaeology and Heritage Impacts

4.6. The land promoters are aware of the archaeological potential on, and near, the draft allocation site and indeed the Canterbury Archaeological Trust (CAT) were commissioned to provide an Archaeological Evaluation Report in 2017 which accompanied the initial 'Call for Sites' submission. The conclusions of CAT were that no graves had been discovered thus far in the north-east field and that "quite extensive work" to the south-east side of Townsend Farm Road had similarly failed to reveal any graves suggesting that the identified Anglo Saxon cemetery is largely confined to the area of the southwest field but that further evaluation work would aim to establish the site's archaeological potential. In this regard the Representors are fully aware of their duty to preserve heritage assets.

# **Local Infrastructure**

4.7. The Representors are fully aware of the probable need for a future development to be the subject of 'developer contributions' for any infrastructure requirements that may be required (including school places if needed).

# Type and Tenure of Housing

4.8.	A development will need to ensure compliance with relevant housing policies requiring an appropriate
	mix and type of development with the inclusion of affordable housing and the Representors
	understand the local and national policy stance in this regard.

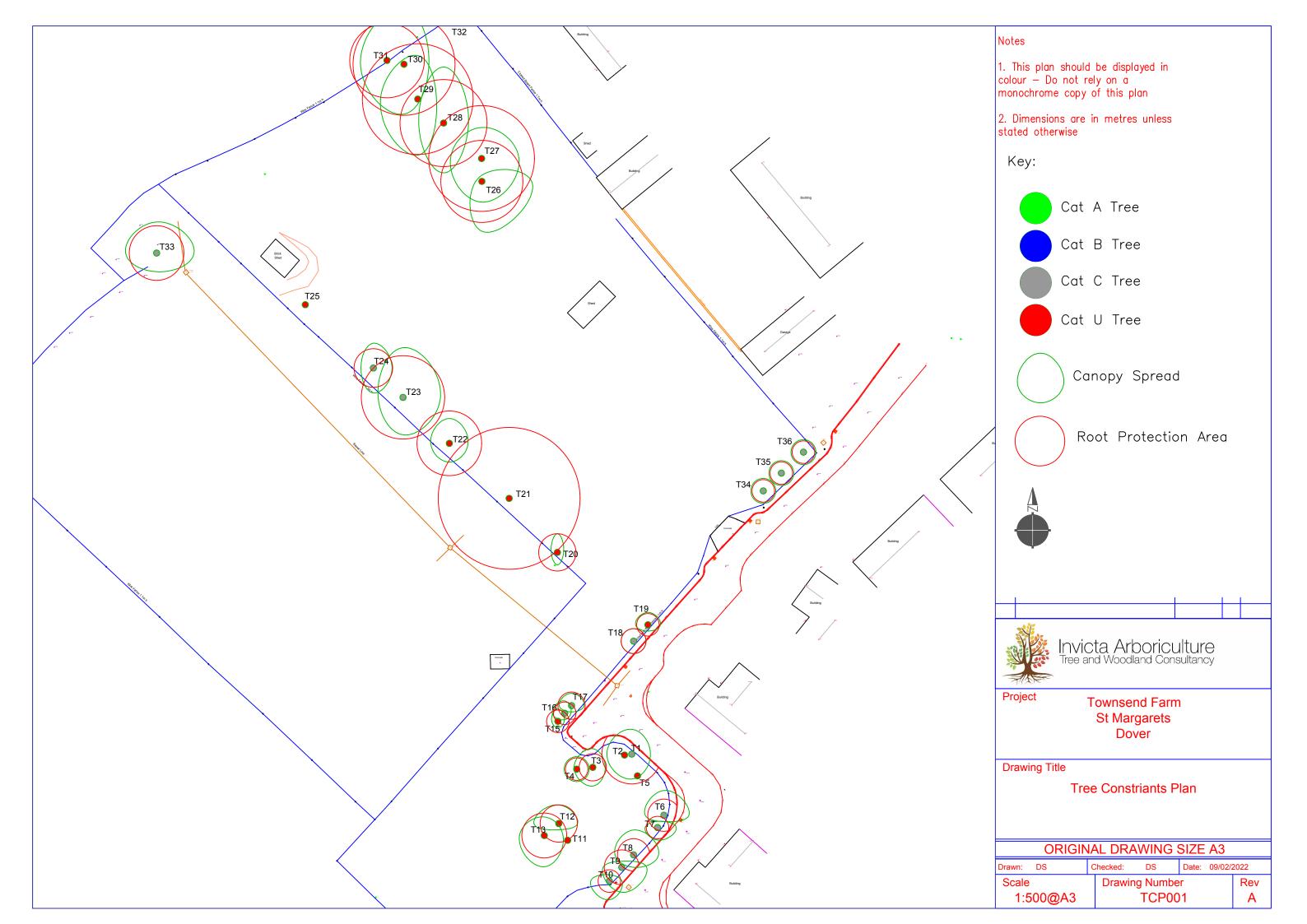
### 5. Conclusions

- 5.1. The Framework, at section 3, requires councils to prepare succinct and up-to-date plans in order to provide a positive vision for the future of each area (NPPF15) with plans leading to be prepared with the objective of contributing to the achievement of sustainable development (NPPF16a) and with draft plans needing to be assessed in terms of their soundness when assessed against legal and procedural requirements (NPPF35).
- 5.2. It is the Representors' submission that the Plan's strategic policies, insofar as they relate to the location and distribution of housing, particularly a distribution within the rural areas, is sound given the robustness of background evidence provided by the sustainability appraisal (SD03b) and the Settlement Hierarchy and Confines Topic Paper 2022 (HEB03). In this regard St Margate's at Cliffe scores highly in consideration of its sustainability credentials.
- 5.3. As demonstrated the site, although mostly within the AONB, provides an opportunity to deliver a sustainable residential development and one that would preserve and, indeed, enhance this part of the edge of rural setting and surrounding AONB. A development could deliver benefits to the local community in terms of safe pedestrian and vehicular access and connect the site, and the wider community, to the nearby Public Right of Way.
- 5.4. As such, it is the Representors' submission that the allocation:
  - a) has been positively prepared evidently meeting the required objectively assessed housing need and, insofar as this site is concerned, promoting an allocation for a suitably sized housing development in a sustainable location;
  - b) **is justified** evidenced by the background information to the plan which confirms the sustainability credentials of St. Margarets-at-Cliffe and that the site in question is available, developable and deliverable;
  - c) **effective** as evidenced in this (and previous) representations and the fact that the Representors have commenced relevant survey work in preparation of the Plan being found sound with the allocation retained, and
  - d) **consistent with national policy** capable of delivering a sustainable development and bringing about the benefits to the St Margaret's community.

# **List of Appendices**

Appendix 1 - Arboricultural survey and report

# **Appendix 1**





# Pre-development Tree Survey and Report Tree Constraints Plan

Townsend Farm
St Margarets-at-Cliffe
Dover
Kent

15<sup>th</sup> February 2022





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# **Appendices**

- A Tree schedule and explanatory notes
- **B** Tree constraints plan

# **Executive Summary**

- 1. **Brief:** Invicta Arboriculture has been appointed to provide arboricultural advice relating to the proposed development. This survey and report has been prepared in accordance with BS5837:2012 "Trees in relation to design, demolition and construction Recommendations.
- 2. **Proposal:** The planning application seeks to form a residential development as identified within the Dover District Council Local Plan
- 3. **Survey:** The site was surveyed on 4<sup>th</sup> February 2022 following the guidance contained within BS5837:2012.
- 4. **Statutory designations**: Tree numbers T26 to T32 are subject to Dover District Council Tree Preservation Order 1976, 1, which is recorded as comprising of twenty two trees (Ash, Sycamore and Elm).

The application site is not located within a Conservation Area.

5. **Arboricultural impact:** The arboricultural impact of the proposed scheme is considered to be low as the trees subject to this report are in varying degrees of both structural and physiological decline or are already dead and considered to pose an unacceptable risk to users of the site and adjacent highway (Dover Road) and will be removed.

A recommendation as made for the removal of the trees within three months of the date of this report.

## 1 INTRODUCTION

- 1.1 **Brief:** I am instructed by Nigel Bonnage to provide a pre-development arboricultural report in accordance with BS5837:2012 in respect of trees at Townsend Farm, St Margarets-at Cliffe, Dover, Kent to accompany a planning application for the formation of a residential development as identified within the Dover District Council Local Plan.
- 1.2 **Qualifications and experience:** I have based this report on my site observations and the information provided, and I have come to conclusions in the light of my experience as an arboriculturist

I am a professional member of the Consulting Arborist Society. I am a Technician member of the Arboricultural Association.

- 1.3 **Documents and information provided:** I was provided with the following documents:
  - A plan of the site as existing.
- 1.4 **Report limitations:** This report is only concerned with the thirty-six trees as shown on the tree constraints plan at Appendix B. It takes no account of any other trees. It includes a detailed assessment based on the site visit and the documents provided, listed in 1.3 above.

This report has been prepared on the basis of the proposed development and should not be interpreted as a report on tree health and safety. Whilst reasonable effort has been made to identify visible structural and physiological defects whilst undertaking the survey, trees and shrubs are living organisms; the health and stability of which can change rapidly; especially in the event of extreme weather conditions, therefore all recommendations given are valid for a period of twelve months from the date of this report.

- 1.5 **Collection of data:** The survey was carried out using the following inspection aids:
  - Digital clinometer- To calculate the height of the trees
  - Girthing tape- To measure stem diameter
  - Leica Disto D1 Laser Measurer To calculate canopy spreads

## 2 SITE VISIT AND OBSERVATIONS

- 2.1 **Site visit:** I carried out a single, unaccompanied site visit on 4<sup>th</sup> February 2022. All of my observations were from ground level within the application site. The weather at the time of inspection was cold and bright with good visibility.
- 2.2 **Brief site description:** The application site is located within the village of St Margarets-at Cliffe in rural east Kent and comprises a field used primarily for the grazing and exercising of donkeys along with the storing of agricultural machinery and trailers. The topography of the site is relatively slopes gently upwards from north to south. The site is exposed from the south.



- 2.3 **Identification and location of the trees:** The trees subject to this report are scattered across the application site. I have illustrated the approximate location of the trees on the tree constraints plan included at Appendix B. This plan is for illustrative purposes only and it should not be used for directly scaling measurements. All of the relevant information and measurements on it are contained within this report and the provided documents.
- 2.4 Collection of basic data: I collected information on species, height, diameter, maturity and potential for contribution to amenity in a development context. I have recorded this information in the tree survey schedule included at Appendix A. I stress that my inspection was of a preliminary nature, and did not involve any climbing or detailed investigation beyond what was visible from accessible points at ground level within the application site.

## 3 APPRAISAL

- 3.1 **Relevant references:** This inspection was undertaken in accordance with *B.S.5837:2012 Trees in relation to design, demolition and construction Recommendations.* The trees were inspected using the Visual Tree Assessment method as documented by Mattheck and Breloer in 'The Body Language of trees', ODPM Research for Amenity Trees number 4, 1994.
- 3.2 **British Standard 5837:2012 Trees in relation to design, demolition and construction Recommendations:** This report is set out according to the recommendations within B.S. 5837:2012 and contains the following information relating to the trees within the application site.
  - Tree survey schedule (included at Appendix A)
  - Tree Constraints Plan (included at Appendix B)
  - Arboricultural implications assessment

# 3.3 Table 1: Tree quality assessment

B.S. 5837:2012 Category	<b>Survey Numbers</b>	Total
U	T2, T3, T4, T5, T11, T12, T13, T14, T15, T19,	21
	T20 T21, T22, T25, T26, T27, T28, T29, T30,	
	T31, T32	
A		0
В		0
С	T1, T6, T7, T8, T9, T10, T16, T17, T18, T23,	15
	T24, T33, T34, T35, T36	

- 3.3 The trees subject to this report are scattered across the application site. Many of the trees are in an advanced stage of both structural and/or physiological decline and are considered to pose an unacceptable risk to users of the land and the adjacent highway (Dover Road) and as such a recommendation is made for the removal of the majority of trees that currently occupy the application site within three months of the date of this report.
- 3.4 T1 to T14 are located towards the southern end of the application site and comprise of a number of dead Elm and Hawthorn trees along with several structurally compromised Goat Willows and a further Hawthorn. A group of small Ash, Field Maples and Hawthorn trees (T5 to T10) extend around the site boundary and display reasonable form and vitality and should be retained.
- 3.5 T15 to T19 and T34 to T36 extend along the field boundary with Townsend Farm Road. T19 has been de-barked by the donkeys that occupy the field and is in decline as a result. The tree will be removed.
- 3.6 T20 (Hawthorn) has been de-barked by the donkeys and is in decline as a result. The tree will be removed.
- 3.7 T21 (Ash) is dead, heavily decayed and collapsing and requires removal.

- 3.8 T22 (Sycamore) has extensive decay evident throughout the southern side of its main stem that extends to a height of six metres above ground level. The tree should be removed.
- 3.9 T23 (Elm) has been de-barked by the donkeys but appears alive and displays good overall vitality. The tree will be removed to enable the development proposal
- 3.10 T24 (Sycamore) displays good overall form and vitality with no significant visible structural or physiological defects. The tree will be removed to enable the development proposal.
- 3.11 T25 (Ash) is dead and should be removed.
- 3.12 T26 to T31 are all Ash trees in varying stages of structural and physiological decline and should be removed regardless of the development proposal. T26 has brackets of the decay fungi *Pereniporia fraxinea* around the circumference of its base. Extensive decay is present throughout the base and root system of this tree. A high chance of structural collapse exists.

T27 and T28 are in overall physiological decline with dieback evident throughout their canopies.

T29 has Honey Fungus (*Armillaria spp*) fruiting bodies around the circumference of its base along with multiple brackets of the decay fungi *Inonotus hispidus* evident throughout its canopy. A high chance of structural collapse exists.

T30 and T31 are dead roadside trees that should be removed due to the unacceptable risk posed to the adjacent highway (Dover Road).

- 3.13 T32 (*Cupressus spp*) is dead and should be removed.
- 3.14 T33 (Ash) is a mature, Ivy clad tree that displays good overall vitality.

### 4 TREE CONSTRAINTS PLAN

4.1 The tree constraints plan is primarily a design tool which shows the below ground constraints represented by the calculated root protection area and the above ground constraints represented by the current and ultimate heights of the trees and the potential effects of shade on any proposed development. The tree constraints plan is included at Appendix B.

# 4.2 **Below ground constraints:**

- The root protection area (RPA) is the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the trees viability and where the protection of the roots and soil structure is treated as a priority. The RPA is measured in m<sup>2</sup>. The RPA is shown as a red circle on the tree constraints plan. The RPA of the trees within the adjacent woodland are not shown on the tree constraints plan as the woodland is unaffected by the development proposal.
- The root protection area relates to the stem diameter of each tree when measured at a height of 1.5m from ground level. For single stem trees the RPA is calculated as an area equivalent to a circle with a radius of twelve times the stem diameter (or the mean diameter of the total number of stems in the case of multi-stemmed trees).
- No below ground constraints are considered to exist as the majority of the trees should be removed on grounds of safety

# 4.3 Above ground constraints:

• There are no above ground constraints.

#### 5 RECOMMENDATIONS

5.1 **Implementation of works:** All tree works should be carried out in accordance with the 2010 revision of BS 3998 *Recommendations for Tree Work*, or as modified by more recent research. It is advisable to select a contractor from the local authority list and preferably one approved by the Arboricultural Association. Their Register of Contractors is available free from The Malthouse, Stroud Green, Standish, Stonehouse, Gloucestershire GL10 3DL; Telephone 01242 577766; Website. <a href="http://www.trees.org.uk/find-a-professional/Directory-of-Tree-Surgeons">http://www.trees.org.uk/find-a-professional/Directory-of-Tree-Surgeons</a>.

The tree works listed in this report are required on the grounds of safety and should be acceptable to the Local Planning Authority (Dover District Council).

- 5.2 **Statutory wildlife obligations:** The Wildlife and Countryside Act 1981 as amended by the Countryside and Rights of Way Act 2000 provides statutory protection to birds, bats and other species that inhabit trees. All tree work operations are covered by these provisions and advice from an ecologist must be obtained before undertaking any works that might constitute an offence.
- 5.3 **Future considerations:** The remaining trees should be inspected on a regular basis by a qualified arboriculturist.

### 6 BIBLIOGRAPHY

6.1 Claus Mattheck and Helge Breloer, The Body Language of Trees. Office of the Deputy Prime Minister, Research for Amenity Trees No 4, 1994.

David Lonsdale, Principles of Tree Hazard Assessment and Management. Department for Transport, Local Government and the Regions, 1999.

British Standard 3998:2010 Recommendations for tree work

British Standard 5837:2012 Trees in relation to design, demolition and construction-Recommendations.

Mr David Sephton Tech Cert (Arbor. A)

# **Appendix A:**

# **Tree Schedule and Explanatory Notes**

- Number: Number of tree as shown on site plan.
- Species: Tree name is given using its commonly known English name.
- Hgt: Height is estimated using a clinometer and given to the nearest metre.
- St Dia: Stem Diameter. Estimated stem diameter, measured 1.5 metres above ground level and given in millimetres.
- N-E-S-W: Crown Spread, estimated by pacing and given in metres.
- •Cr Cl: Crown Clearance above ground level, given in metres.
- •AC: Age Class. young (Y), semi mature (SM), mature (M), over mature (OM), veteran(V).
- •PC: Physiological Condition. Good (G), fair (F), poor (P), dead (D).
- •SC: Structural Condition. Good (G), fair (F), poor (P).
- •Recommendations: Preliminary management recommendations/ general comments.
- •ERCY: Estimated remaining contribution in years (0-10, 10-20, 20-40, 40+).
- •Cat: Retention Category. See table 2 below.
- •RPA Radius: Root Protection Area Radius, given in meters.

# Table 2: Retention Category's (as per cascade chart, Table 1, B.S. 5837:2012)

U	Those trees in such a condition that they cannot be realistically be retained as living trees in the context of the current land use for longer than ten years. Shaded Red on site plan.
A	High quality and value (40yrs +) 1: Mainly arboricultural values, 2: Mainly landscape values, 3: Mainly cultural values i.e. conservation. Shaded Green on site plan.
В	Moderate quality and value (20yrs +) 1: Mainly arboricultural values, 2: Mainly landscape values, 3: Mainly cultural values i.e. conservation. Shaded Blue on site plan.
С	Low quality and value (10yrs +) 1: Mainly arboricultural values, 2: Mainly landscape values, 3: Mainly cultural values i.e. conservation. Although category C trees would not be retained where they would pose a significant constraint on development, young trees with a stem diameter of less than 150mm should be considered for relocation. Shaded Grey on site plan.

**Appendix A:** 

# B.S. 5837:2012- Tree Survey Schedule: Townsend Farm, St Margarets-at-Cliffe, Dover, Kent

<u>Number</u>	<b>Species</b>	<u>HGT</u>	St Dia	<u>N-S-E-W</u>	<u>CC</u>	<u>Age</u>	<u>PC</u>	<u>SC</u>	Recommendations	$\underline{\mathbf{E.R.C.Y}}$	<u>Cat</u>	RPA Radius	RPA M <sup>2</sup>
1	Elm	10	400	4-4-3-4	3	M	G	G		10+	C1	4.8	72.4
2	Hawthorn	5	N/A	N/A	N/A	M	D	P	Tree appears to be predominantly dead - Remove	0-10	U	0.0	0.0
3	Goat Willow	7	180	3-3-2-3	1	S/M	F	F	Structurally defective - Remove	0-10	U	2.2	14.7
4	Goat Willow	7	150	2-2-2-2	1.5	S/M	F	F	Structurally defective - Remove	0-10	U	1.8	10.2
5	Elm	9	N/A	N/A	N/A	M	D	P	Tree is dead - Remove	0	U	0.0	0.0
6	Ash	7	220	4-1-4-3	1	S/M	G	G	None - Retain	10+	C1	2.6	21.9
7	Field Maple	7	150	1-2-3-2	1	S/M	G	G	None - Retain	10+	C1	1.8	10.2
8	Field Maple	7	220	4-2-4-3	1	S/M	G	G	None - Retain	10+	C1	2.6	21.9
9	Field Maple	7	230	1-4-4-3	1	S/M	G	G	None - Retain	10+	C1	2.8	23.9
10	Hawthorn	4	150	1-3-2-3	1	S/M	G	F	None - Retain	10+	C1	1.8	10.2
11	Elm	9	N/A	N/A	N/A	M	D	P	Tree is dead - Remove	0	U	0.0	0.0
12	Goat Willow	8	250	3-1-3-4	1.5	S/M	G	G	Structurally defective - Remove	0-10	U	3.0	28.3
13	Goat Willow	8	300	3-5-3-4	1.5	M	F	F	Structurally defective - Remove	0-10	U	3.6	40.7
14	Hawthorn	11	300	2-2-2-2	3	M	G	P	Structurally defective - Remove	0-10	U	3.6	40.7
15	Goat Willow	6	150	2-1-1-1	1	S/M	F	F	None - Retain	0-10	U	1.8	10.2
16	Field Maple	6	150	2-1-1-2	1	S/M	G	G	None - Retain	10+	C1	1.8	10.2
17	Ash	6	180	2-1-2-2	1.5	S/M	G	G	None - Retain	10+	C1	2.2	14.7
18	Field Maple	6	170	2-2-2-2	0	S/M	G	G	None - Retain	10+	C1	2.0	13.1
19	Field Maple	6	150	2-1-2-2	0	S/M	F	F	De-barked by Donkeys - Remove	0-10	U	1.8	10.2
20	Hawthorn	8	250	3-2-1-1	1	M	F	F	De-barked by Donkeys - Remove	0-10	U	3.0	28.3
21	Ash	13	950	N/A	N/A	M	D	P	Tree is dead and heavily decayed - Remove	0	U	11.4	408.3
22	Sycamore	11	430	4-3-3-3	1.5	М	P	P	Extensive decay evident throughout southern side of main stem to six metres above ground level - Remove	0-10	U	5.2	83.6
23	Elm	18	560	8-6-6-4	2	M	G	G	De-barked by Donkeys but still fully alive and functioning –	10+	C1	6.7	141.9

									Remove to enable development proposal				
24	Sycamore	10	260	4-4-3-2	1	M	G	G	Remove to enable development proposal	10+	C1	3.1	30.6
25	Ash	10	N/A	N/A	N/A	S/M	D	P	Tree is dead - Remove	0	U	0.0	0.0
26	Ash	17	550	1-8-8-1	4	M	P	P	Pereniporia fraxinea fungi around circumference of base with extensive decay suspected throughout root system - High risk of collapse - Remove	0-10	U	6.6	136.8
27	Ash	17	710	5-7-6-5	2	M	P	P	In overall decline - Remove	0-10	U	8.5	228.0
28	Ash	17	580	9-8-4-4	7	M	P	P	In overall decline - Remove	0-10	U	7.0	152.2
29	Ash	17	740	7-9-3-6	6	М	P	P	Armillaria spp fungal fruiting bodies (Honey fungus) evident around circumference of base.  Inonotus hispidus fungal brackets and associated decay evident throughout canopy - Remove	0-10	U	8.9	247.7
30	Ash	12	680	9-8-4-7	3	M	D	P	Tree is predominantly dead - Remove	0-10	U	8.2	209.2
31	Ash	9	500	N/A	N/A	M	D	P	Dead roadside tree - Remove	0	U	6.0	113.1
32	Cupressus spp	10	N/A	N/A	N/A	M	D	P	Tree is dead - Remove	0	U	0.0	0.0
33	Ash	14	370	5-3-6-5	2.5	M	F	F	None - Retain	10+	C1	4.4	61.9
34	Field Maple	5	150	2-2-2-2	0	S/M	G	G	None - Retain	10+	C1	1.8	10.2
35	Field Maple	5	150	2-2-2-2	0	S/M	G	G	None - Retain	10+	C1	1.8	10.2
36	Field Maple	5	150	2-2-2-2	0	S/M	G	G	None - Retain	10+	C1	1.8	10.2

# **Appendix B: Tree Constraints Plan.**

