

## Tree Consultation Response on Planning Application

**Case Officer:** Joanne Meneaud (Principal Planning Officer)  
**From:** Shane Burgess (Open Spaces Officer)  
**Date:** 06/06/2022  
**Planning Reference:** 20/00318/OUT  
**Location:** Land at Hill Farm, Hempsted  
**Proposal:** Outline planning application for the erection of up to 245 Dwellings and associated infrastructure

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### Relevant Planning Policies and Guidance:

#### 1. National Planning Policy Framework (2021)

*'Para 131 - Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.'*

#### 2. Adopted Development Plan - Joint Core Strategy (2017) Policy INF3 (Green Infrastructure)

*'Development proposals should consider and contribute positively towards green infrastructure, including the wider landscape context and strategic corridors between major assets and populations*

*Existing green infrastructure will be protected in a manner that reflects its contribution to ecosystem services (including biodiversity, landscape / townscape quality, the historic environment, public access, recreation, and*

*play) and the connectivity of the green infrastructure network. Development proposals that will have an impact on woodlands, hedges and trees will need to include a justification for why this impact cannot be avoided and should incorporate measures acceptable to the Local Planning Authority to mitigate the loss. Mitigation should be provided on-site or, where this is not possible, in the immediate environs of the site*

*Where assets are created, retained, or replaced within a scheme, they should be properly integrated into the design and contribute to local character and distinctiveness. Proposals should also make provisions for future maintenance of green infrastructure.'*

### **3. Emerging Development Plan - Gloucester City Plan (Pre-Submission)**

The Pre-Submission version of the Gloucester City Plan (City Plan) was approved for publication and submission on 26 September 2019 and has been submitted for examination. On the basis of the stage of preparation that the plan has reached, and the consistency of its policies with the NPPF, the emerging policies of the plan can be afforded moderate weight in accordance with paragraph 48 of the NPPF. Policy E4 (Trees, Woodlands and Hedgerows) states:

*'Development proposals should seek to ensure there are no significant adverse impacts on existing trees, woodlands or hedgerows and that every opportunity is taken for appropriate new planting on site. In the case of an unavoidable significant adverse impact on trees, woodlands and hedgerows, the developer must provide for measurable biodiversity net gain on site, or if this is not possible:*

- I. At nearby Green Infrastructure projects/areas; or*
- II. In suitable areas of parks, open spaces, verges; or*
- III. Through the restoration or creation of traditional orchards, prioritising sites identified as opportunities for increasing the connectivity of the ecological network; or*
- IV. As new or replacement street trees.*

*Development which would result in the loss of irreplaceable habitats such as Ancient Woodland, Ancient Trees, and veteran trees\* will not be permitted except in wholly exceptional circumstances.*

*On development sites where existing trees to be retained, applicants will be required to demonstrate how these trees will be protected through all phases of development. It is expected that the protection measures will adhere to those contained within BS 5837:2012 Trees in relation to design, demolition and construction – recommendations, or subsequent revisions.*

*All new planting, either on site or elsewhere in the city as part of biodiversity net gain must be provided to the satisfaction of the City Council.'*

## **Comments:**

### Site Character

The proposed scheme comprises residential development of up to 245 dwellings, public open space and recreational opportunities, green corridors, new hedgerow and tree planting, sustainable drainage, and children's play. Gladman Developments Limited Arboricultural Impact Assessment (February 2002) has been submitted in support of the application.

The area is characterised by woodland, which is sparsely distributed across the landscape, but a well wooded impression is provided by frequent hedgerow trees, parkland and surviving traditional orchards. Significant screening tree belts and woodland are prominent elements in the local landscape around the sewage farm and to the southwest and northwest of Hempsted.

There are no TPO or CA constraints on the site and there are no veteran trees or ancient woodlands within or adjacent to the site. To the north, there is a hedge and vegetation along the PROW. Properties backing onto the northern edge of the site are typically well vegetated, with mature trees and hedgerows. There is a hedge, vegetation and sparse tree planting comprising Ash, blackthorn, hawthorn, dogwood, hazel, field maple, English oak. along the south eastern boundary along the A430. There is a hedge, vegetation and sparse tree planting comprising Blackthorn, Hawthorn, English elm, bramble, and English oak and a common ash, along the south western boundary.

By virtue of its raised height and positioning; the south eastern and south western boundary, and the site within; commands prominent views into the city from the main thoroughfare. To some degree the existing planting provides a screening belt from the main road.

### Proposed Development

The appellants submission suggests the following:

- Implementation of the proposed scheme will necessitate the removal of nine small sections of hedges.
- No trees are required to be removed to enable the development.
- The trees and hedgerows that are to be retained on the site will be protected with tree protection fencing commensurate BS5837: Trees in relation to design, demolition and construction - Recommendations'. The appellant proposed to secure these details should a reserved matters application be submitted.

### Comments

At face value a) the proposed scheme would only necessitate the removal of nine small sections of hedges. b) no trees are to be removed and c) retained trees would be suitably protected by details which shall be agreed should any reserved matter application come forward. d) the development could be used to enhance tree cover in the area.

But there are a number of points of concern:

1. The plan depicts planting of circa 130m of new hedgerow and 30 new trees in the public open space. This is not dissimilar in length to the length of hedges that are likely to be removed and the number of new trees is very low for a development of this size. Appreciative that this is an outline plan; but a far more substantial planting scheme would be required for any detailed plans that may come forward.
2. Should the site be developed as shown (with the very low level of planting) this would offer little effective screening along the southern edge of the housing estate, then the new, clearly visible edge would comprise views of rear gardens fences, parked cars and building facades. An improved scheme for screening these important views is needed. This should be a suitable mix of native trees that will reach an ultimately large and prominent size. Additional planting of native hedgerows with more mature specimens to enable quicker establishment will also be required.
3. In order to properly provide a suitable level of screening on such a steeply sloping site, tree planting would also need to be included along the boundaries between rear gardens.
4. Sufficient tree planting will also need to be incorporated where possible to the frontages of dwellings and along new streets. As such that trees would provide suitable amenity benefit to potential new residents.
5. Orchards are found locally so it would be appropriate to try and secure a new orchard area in the development somewhere.
6. Bat & bird boxes would need to be installed on retained trees and buildings, reptile & amphibian shelters, separate hedgehog shelters etc
7. No mention is made of the changes to screening in winter where this is very likely to have a substantial effect on screening density. The appellant should provide further justification of how suitable screening would be achieved in the winter season.

## **Conclusion**

The indicative planting scheme is insufficient for a development of this size. Due to the topography of the site and its prominent location adjacent to a busy thoroughfare into the city; the proposed landscape buffer is inadequate. An increased provision of a suitable mix of native trees that will reach an ultimately large and prominent size and additional proposed planting of native hedgerows with more mature specimens to enable quicker establishment would be required to soften views.

## **Objection**

Notwithstanding the above and without prejudice to the decision; should the Inspector be minded to allow this outline appeal (and given the importance that tree and vegetation planting would have at this site) GCC would seek to ensure that the following details are secured at any reserved matters application. For the reasons identified above, it would not be considered appropriate to agree the scheme of tree planting via planning condition thereafter.

*Tree/Hedgerow Planting Scheme-Details Required & Provision for replacement*

Prior to reserved matters permission being permitted, full details of proposed tree/hedgerow planting shall be submitted to and approved in writing by the Local Planning Authority. The details shall include location, species and sizes, planting specifications, maintenance schedule, provision for guards or other protective measures. The details shall include the tree pit design and location, type and materials to be used for hard landscaping including specifications.

To ensure adequate provision for trees/hedgerows, in the interests of visual amenity and the character and appearance of the area. In accordance with the NPPF, Policy INF3 of the JCS and Policy E4 of the Gloucester City Plan.