

ARBORICULTURAL STATEMENT ADDENDUM
For
Proposed construction of a block of four
apartments, with means of access and parking
within the grounds of Clayton Manor

At

Ribchester Road, Wilpshire BB1 9HU

For Submission to
Ribble Valley Borough Council

Planning References
3/2023/0930
2/2010/0414
3/2013/0759

On the Instructions of:
Mr Philip Heaton

Report Ref:
DTCL.298.AMS.(2).2024

Report Date:
14 February 2023

Addendum Date:
29 February 2024



DEALGA'S TREE CONSULTANCY LTD



Contents

Disclaimers	3
1. Introduction & Background	4
2. The Site & Surroundings	5
3. Trees & Countryside Concerns	6
3.1 Evidence & trial pits	6
3.2 Impacts	7
3.3 Crown Asymmetry	7
3.4 Pruning-crown reduction	8
4. Modifications to the previous AMS	8
5. Conclusions	9
Drawing No.2101/SK/04 Annotated	10

Disclaimers

General - Trees

Unless otherwise stated tree inspections have been undertaken from ground level and using non-invasive techniques only. Comments on the condition and safety of any tree relate to the condition of the tree at the time of survey. It should be recognised that tree condition is subject to change due to, for example, the effects of disease, wind, or nearby development works. Changes in land use are also significant in respect of risk assessment. Trees should therefore be inspected at intervals relative to identified site risks.

Unless otherwise specified, no checks have been carried out in respect of statutory controls that may apply, e.g., Tree Preservation Orders, Conservation Areas or planning conditions. In addition, prior to undertaking any tree works, it is necessary to ensure due diligence is followed in respect of protected species and habitats.

Copyright & Non-Disclosure Notice

The content and layout of this report are subject to copyright owned by Dealga's Tree Consultancy Ltd (DTC Ltd) save to the extent that copyright has been legally assigned to us by another party or is used by Dealga's Tree Consultancy Ltd under license. This report may not be copied or used without our prior written agreement for any purpose other than the purpose indicated in this report.

Third Party Disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by DTC Ltd at the instruction of, and for the use by, our clients named within the report. This report does not in any way constitute advice to any third party who is able to access it by any means. DTC Ltd excludes to the fullest extent lawfully permitted, all liability whatsoever for any loss or damage arising from reliance on the content of this report.

1 Introduction & Background

- 1.1 A planning application for consent to erect a block of four apartments together with means of access and associated parking within the grounds of Clayton Manor, Wilpshire, Blackburn BB1 9HU has been submitted to Ribble Valley Borough Council (the Council) under planning reference **3/2023/0930**. Previously, the Council granted full planning permission for two new dwelling houses at the same site under planning references 3/2010/0420 and 3/2013/0759.
- 1.2 There are no trees on the site of the proposed development but there were four mature trees close to the boundary wall between the application site and the neighbouring property on Knowsley Road, two of which have been lawfully removed. The remaining trees are the subjects of 'The Glendene Tree Preservation Order'.
- 1.3 The current proposal is to erect a block of four apartments on the site with associated parking using the existing access onto Ribchester Road., and the provision of five (5) car parking spaces, (Architects Drawing Ref No. 2101/SK/04).
- 1.4 As there are no trees growing on the site of the proposed development it is considered that an Arboricultural Impact Assessment (AIA) report is not required in this instance. Protection measures for the two mature trees in the neighbouring property, close to the boundary wall, were set out in detail at Section 4 of the Arboricultural Method Statement (AMS), of February 2023, which follows the guidance contained in **BS5837: 2012**. In assessing the application, the Council consulted the Trees & Countryside section, which provided the response set out below.

Thank you for your response.

However, I do not feel that enough evidence has been submitted to prove that "very little if any tree roots" are present within the proposed development site and that the proposed development will not have a negative impact on the trees amenity value or potentially destabilise the root plate.

The two protected sycamore trees in question have asymmetrical crowns which nearly completely overhang the proposed parking spaces, taking this into account it would suggest that there is a high possibility the trees' root plate could extend to the adjacent garden, albeit under or through the wall.

You have now agreed that there will be excavation works within the potential RPAs of the protected trees so it would be beneficial to dig some Trial Pits (either by, or supervised by a qualified Arborist approx. 0.6m - 1.2m where applicable) throughout the potential RPA's to ascertain if indeed any roots are present, especially over 2.5mm. Please note that the lawned area is raised so Trial Pits might have to be dug slightly deeper.

If this is not achievable then at the minimum, the excavation works should be carried out by utilising a combination of both hand and machine safe digging techniques and supervised by a qualified Arborist, which as you say could be added to the Method Statement in more detail.

1 Introduction & Background (Continued)

Countryside Response (Continued)

However, as mentioned in my original email, over 60% of two of the tree's crowns overhang the proposed parking bays 1, 2, & 3, so there will always be overhanging branches unless the trees are felled or severely pruned which would be in direct contravention of BS:3998 2010 Tree Work Recommendations. Taking this into consideration I do not think the proposed carparking design is appropriate for the safe retention of the protected trees and their amenity value.

I still think an AIA is required to highlight the issues outlined above and provide recommendations of how the negative impact on the trees can be mitigated. Even if the Trial Pits reinforce Dr O'Callaghan's views, primarily due to the negative impact the parking spaces will have on the amenity values of the protected trees and potential root plate stability."

The emphasis is mine.

1.5 The key points of concern to the Trees & Countryside Service can be summarised as follows:

1. That there is no/insufficient evidence to prove that there are "very little if any tree roots" within the development site.
2. Not enough evidence to show that the proposed development would not have a negative impact on the trees' amenity value or potentially destabilise the root plate.
3. The two trees have asymmetrical crowns which overhang the proposed parking spaces, and this suggests that the root plates extend into the development site.
4. Pruning back the overhanging branches would be "***in direct contravention of BS 3998: 2010***".
5. An AIA Report is required to deal with mitigation and irrespective of any evidence provided by trial pit excavation, the amenity value of the trees, and their root plates' stability would be negatively impacted.

Each of the concerns is addressed in the following section.

2 The Site & Surroundings

2.1 The site and surroundings are described in detail in the previously submitted Arboricultural Method Statement and will not be repeated here. Please refer to the AMS dated 14 February 2023 and submitted to the Council in support of the application.

3 Trees & Countryside Concerns

3.1 Little evidence of the lack of roots within the development site

- 3.1.1 The basis for the assertion that there are few or any roots under the development site was based on the fact that the boundary wall is 1.4m in height with deep foundations and it is approximately 160 years old, showing no signs of damage, deterioration, or distortion. The two trees on the other side of the boundary wall, post-date the wall by a considerable period of time, an estimate is over 75-years.
- 3.1.2 In order to see if any tree roots are present two trial pits (TP1 & TP2) were opened on the development site side of the wall at positions directly opposite the trunks of the remaining two trees, (Drawing No. 1210/SK/04 Annotated). TP1 was opened to a depth of 1300 mm, and TP2 to a depth of 1400 mm, (Photograph 1). The foundations of the wall were found to be 800 mm deep in both trial pits, (Figure 1).



Photo 1: A view of one of the excavated trial pits showing the below ground area of the wall. Ground level is shown by the yellow lines.



Photo 2: Another view of a trial pit with ground level shown by the yellow line. The small roots in this trial pit are shrub roots. Note no roots are coming through the wall.

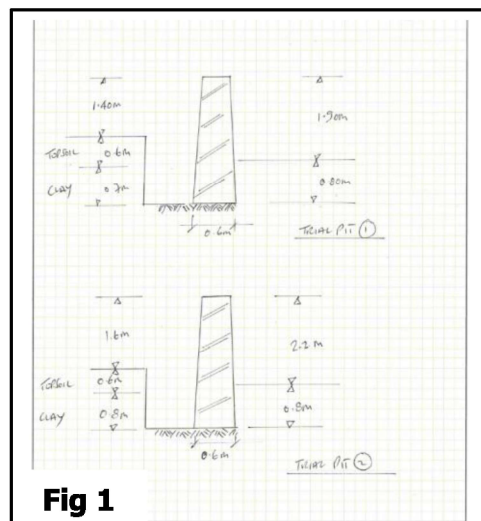


Fig 1

Figure 1: A schematic representation of the trial pits showing the depth of the excavations and foundations.

3 Trees & Countryside Concerns (Continued)

3.1.3 No roots were found coming through or under the wall into the development site, (Photograph 2). The only root material observed in the trial pits is from shrubs that are/were growing on the development site side of the wall.

3.1.4 The excavations clearly show that there are no tree roots on the development site side. Therefore, the Trees & Countryside concern about this aspect has been shown to be unfounded following the suggested excavations.

3.2 The proposed development would impact on the trees' amenity value and stability.

3.2.1 The trial pit excavations have shown that there are no roots from the protected trees on the development site side of the boundary wall. It follows therefore, that construction of the apartment block and the two parking bays would not impact the roots of the trees in any way. As the construction would not impact the trees' root zones, there would not be any negative impacts on the health and vitality of the trees. Similarly, because there would be no root loss/damage, the stability of the trees would be unaffected by the development.

Therefore, this concern of the Trees & Countryside Service is not valid and cannot be sustained.

3.3 Asymmetric crowns and overhang suggest that the roots extend into the development site.

3.3.1 The issue of roots extending into the development site has been addressed by the trial pits and as set out at §3.1 above and will not be repeated here.

3.3.2 It must be pointed out that morphologically there is no straight linear link between the location of roots and that of scaffolds/branches in the crown. To think otherwise is both incorrect and misleading. In any event it is our opinion that the asymmetry of the crowns is due to 'phototropism', i.e., the branches grow towards the areas where most sunlight is present during the day and does not represent faults or flaws in the trees' structure.

With respect, it is pointed out that trees are dynamic, self-optimising organisms the grow in such a way as to equate any forces exerted upon them. They do this by laying down 'reaction wood' to compensate for force(s), thus allowing the tree(s) to remain upright and stable. The slight lean and overhang from the off-site protected trees show the trees' response to the phototropic influence. The shape and form of the trees is entirely natural.

Therefore, the Trees & Countryside concern about this aspect cannot be sustained.

3 Trees & Countryside Concerns (Continued)

3.4 Pruning back the branches is in "*direct contravention of BS3998: 2010*".

3.4.1 This is simply wrong. **BS3998: 2010** '*Tree Work – Recommendations*' allows for pruning of trees at Section 7 '**Pruning and related work**'. In this section various types of pruning operation are described and specified. In this instance, what is proposed is the prune back the overhanging branches which is actually 'Crown Reduction' and this is covered at paragraphs **7.7.1**, **7.7.2**, and **7.7.3** of the Standard. Far from being a 'direct contravention' of the Standard, the proposal conforms to the guidance in the Standard and, when done correctly it can enhance the amenity value of a tree.

3.4.2 The claim that over 60% of the crowns overhang the proposed parking areas is an exaggeration. It is true that there is some overhang, but not as much as 60% or more, as is claimed in the Trees & Countryside response. The lower overhanging branches, i.e., up to 7 m above ground would be pruned to reduce the extent of the overhang, and this would not adversely affect the amenity value of the trees.

3.5 An AIA Report is required irrespective of the results of the excavations.

3.5.1 With respect, an AIA Report is not required. There are no trees on the proposed development site. It has been shown that the two trees on the other side of the boundary wall would not be impacted by the proposed development. Their roots do not extend under the development site and neither their amenity value nor their stability would be negatively affected by the proposed development.

3.5.2 To require an AIA Report irrespective of what the trial pit excavations show is unreasonable. It may be argued that the proposed crown reductions would impact the amenity value of the off-site trees, but as set out at Section 3.4 above, this is not excessive and is in keeping with the requirements of BS3998. It is a simple tree works operation which does not require an AIA, as it can be conditioned as part of the planning permission.

4 Modification to the previous Arboricultural Method Statement (AMS)

4.1 The AMS of February 2024 specified a 'no dig' and cellular confinement system for the construction of the proposed parking areas. At that time, February 2024, it was not known if any of the roots of the protected trees were growing under the proposed parking areas. However, the trial pit excavations have shown conclusively that there are no roots of the protected trees in the development site. Therefore, the no dig/cellular confinement system **is not required**.

5 Conclusions

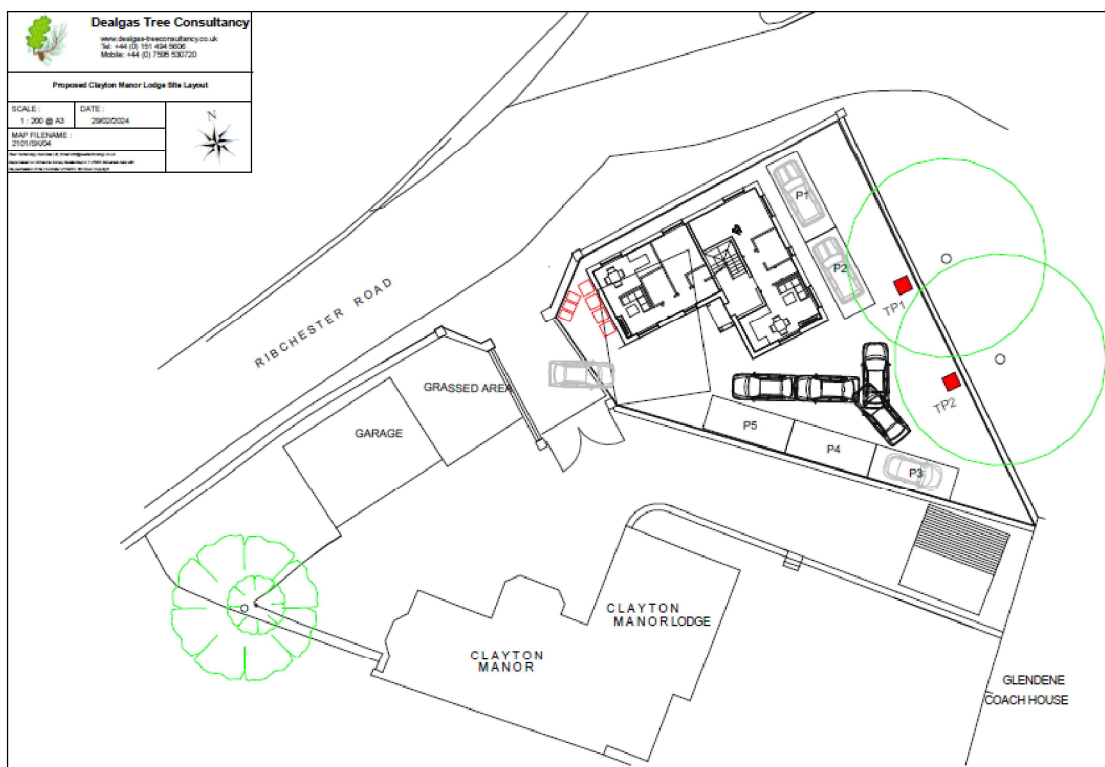
- 5.1 The trial pit excavations revealed that no roots of the off-site protected trees have grown, either through or under the boundary wall, into the proposed development site.
- 5.2 Construction of the proposed apartment block and parking areas would have no negative impacts on the stability, health and vitality, or amenity value of the off-site protected trees.
- 5.3 Branches of the off-site trees overhang two of the proposed parking areas to some extent, but these can be pruned back to reduce the crowns and remove the overhang.
- 5.4 Only overhanging branches up to 7 m above ground level would be pruned and all work would be in accordance with BS3998: 2010 or any future iterations of that standard. This can be made a condition of planning permission.
- 5.5 The no dig/cellular confinement system for the construction of the car parking areas and other hard surfaces to protect tree roots, as set out in the AMS of February 2003 will not be required.

Attachments: Drawing No. 2010/SK/04 Annotated.

Dr D P O'Callaghan, FICFor, F Arbor A, MISA
Chartered Arboricultural Consultant
29 February 2024



Drawing No. 2101/SK/04 Annotated





DEALGA'S TREE CONSULTANCY LTD

