

From: [REDACTED] >

Sent: 04 February 2020 12:20

To: Southampton to London Pipeline Project

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Subject: Turfhill Park: Review of Arboricultural Report

Importance: High

Dear Mr Allen,

When we submitted our Deadline 4 submission to the Inspectorate, we emphasised that this was work in progress in the light of the important questions you have asked the Applicant to answer at Deadline 4. Their responses will be examined in close detail by our two Residents Associations once they are published and inevitably they will lead to additional comment which we hope the ExA will find useful during the final stages of their deliberations on this important Project.

However, we continue to remain jaundiced about the Applicant's commitment to provide complete explanations on their decision to adopt the Route F!a+. This is particularly in respect of their attitude to environmental issues and the dismissive way that they and their Arboricultural Consultant have already approached the Tufhill Park tree concerns. And this is before addressing further requests for information about the additional damage likely to be caused to trees bordering Guildford Road and the potential on-site compound, both which remain clouded in mystery!

We have therefore felt compelled to consult our own expert and our additional submission is attached for your examination and consideration alongside our Deadline 4 paper in the hope that you will allow this to form part of the Examination process?

Many thanks in anticipation of your agreeing to accept this relevant and important registration of our concerns.

HCRA

CGRA

SLP – Review of the Applicants Arboricultural Report

Introduction

The Heronscourt and Colville Gardens Residents Associations (the RAs) have raised the issue of the accuracy and completeness of the Applicant's Arboricultural report in all of its previous submissions to the Examining Board.

The RAs recently had the opportunity of discussing this report and comparing its finding with an expert's view by examining a small stretch of F1a, selected at random.

His views enable the RAs to put before the Board some definitive statements to underwrite their earlier statements about the Applicant's report.

The review of the Applicant's report and subsequent examination of the trees running along approximately 350 metres of F1a from behind Colville Gardens to the turn into the new section of the route, was carried out by Mr Trefor Hogg B.Sc. Hons Plant Biology with Microbiology.

He is Chairman of Surrey Heath Tree Wardens (registered charity); Member of the British Ecological Society; Chairman of Camberley Wildlife; Secretary and Trustee Old Dean Community Group (registered charity) and a Community Representative to NHS Surrey Heath CCG.

Survey Findings

Trefor Hogg's report states the following;

1. The consultants used by Esso to look at the trees seem to have taken a very partial view. They appear to have made errors, and in my opinion have not entirely followed the recommendations of BS5837:2012.
 - a. **They have failed to take into account the trees as a major landscape feature.** The trees concerned, form an avenue of trees on the highest ground in the area which creates a backdrop to the view from Colville Gardens/ Heronscourt and across a wider area of Lightwater. As a major landscape feature I would expect the trees to be collectively classed as A2 in accordance with the recommendations made in the British Standard. However, all of the trees described are shown as either B2 or a lower quality.
 - b. **They have not taken into account that the trees on either side of the path form an Avenue bordered by mature trees on both sides.** The loss of trees on one side would result in the destruction of this highly valuable amenity which also encourages dog walkers to not encroach on the SPA land immediately to the South.
 - c. **The line which Esso have indicated they will take and that was marked by flags for the inspection visit is very much to the Southern side of the area surveyed** and as a result it seems that some trees that should have been included in their survey are not described.

- d. **All the trees reported on are given an expected life of twenty years or less.** In reality most of the trees described would still be present in fifty years or more provided they were not subjected to stress by activities such as pipeline laying.
- e. **There seem to be differences between their survey report and actual features on the ground.** For instance our short check of the survey plan in just one small area around coordinates 161620N 493100E showed:

- i. A *Pinus sylvestris* in good condition with a stem diameter of 487 millimetres located midway between trees T49 and T58 on their plan that was missing from the plan despite its proximity to the intended route. Picture 1 - centre tree

- ii. T9 does not appear to be present in reality, despite appearing on the plan and reported as a substantial *Pinus sylvestris* with “pruning wounds”. Picture 2 shows a blank area where it should appear.

- iii. A substantial group of three *Eucalyptus* stems – each in excess of 450mm diameter and around 30 metres in height is disregarded. Picture 3 showing the three *Eucalyptus* stems.

- f. **The root protection areas described for a number of the trees are significantly less than the crown spread would indicate.** An example is T73 *Fagus sylvatica* with a crown spread out to 8 metres in all directions (despite historic crown reduction) which has an RPA radius of just 6.8 metres. It is very likely that the roots of this tree extend considerably further than the recommended RPA.
2. The costs of applying appropriate technical measures to this route in order to avoid damaging a very large number of trees would be very considerable. Given this is the installation of a very large steel pipeline it is in my view most unlikely that Esso’s contractors could prevent substantial damage even if the maximum possible measures were employed.
 3. Protection of vulnerable populations of fauna during construction projects is well understood and a common occurrence, with temporary relocation of fauna and the use of barrier measures normally regarded as more than adequate. It is a cheap and effective approach. In the case of sand lizards those measures should of course be taken well in advance of construction as they are only effective when the lizards are visible. In other words some sensible project planning could entirely mitigate the “sand lizard problem”.
 4. Overall, I really do not understand why the simpler, cheaper and less damaging existing route through this part of the SPA is not used with appropriate measures put in place instead of pursuing this new, costly and highly damaging route. By going round the edge of Turf Hill they are considerably enlarging the area that is already damaged by pipelines and overhead cables, and inevitably the area between the two pipeline routes will also become degraded over time.

End of report.

Picking up on point 1 (a) of Mr Hogg’s report, the Applicant states that its survey was carried out in accordance with BS5837:2012 which describes three categories of A trees;

- A1 “Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)”

- A2 "Trees, groups or woodland of particular visual importance as arboricultural and/or landscape features"
- A3 "Trees, groups or woodland of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)"

The Applicant seems to have been very selective in its approach to this task and focussed entirely on A1. It has missed, not understood or ignored the fact that the avenue of trees when viewed from Heronscourt and Colville Gardens forms part of an important landscape feature, which are generally in good condition with a long potential life and should have been considered and reported on as under category A2. As has been reported in earlier submissions, these avenues of trees, comprising the three parts of the route F1a+, are a major landscape feature and make a considerable contribution to this public amenity.

It is also difficult to understand why they have assigned all of the trees a life expectancy of only 20 years or less as there is absolutely no reason why many of them should not be around for the next 40 years if they are not disturbed by construction activity.

Enlarging on Mr Hogg's point 2 above, roots provide a tree's support and stability as well as supplying water and elements of nutrition. As these tree roots are extending from both sides of F1a well into its Order Limits, and with the added complexity of the existence of the water main throughout F1a, it is inconceivable that during construction, the integrity of many significant trees will not be substantially compromised as may that of the water supply to that area of Lightwater.

Summary

Mr Hogg's investigation not only underwrites, but significantly increases the criticisms that the two Residents Associations have about the accuracy, completeness and now the selective focus of the Applicant's Arboricultural report. By ignoring the considerable value of these tree lined avenues as Landscape Features and underestimating their anticipated life spans, it totally undermines any influence the Arboricultural Report may have in determining the use of F1a+.



PICTURE 1



PICTURE 2



PICTURE 3