

I object to application 21/XXXX for the following reasons:

1. As the applicant concedes, the trees on site were planted specifically to mitigate for noise when the A27 was built, dividing Emsworth into two halves.

That was in the late 1980s, and the planting alongside the road is now maturing and just beginning to come into its own as an effective acoustic barrier for residents nearby and further away, together with the other benefits stated in Point 6 below.

The applicant gives no grounds for removal, such as tree health, safety risk or property damage. The sole reason for the removal of TPO 1838 and the request to fell 24 of the trees in the TPO group, is the back garden in-fill construction of a 4-bed detached house and garage overlooking the A27.

However, we all know the increasing volumes of traffic, congestion, reducing air quality, and traffic noise are certainly not decreasing – we need more trees not less, and the Government recently announced a trebling of tree planting rates in order to net zero carbon and protect communities and natural habitats from climate change impacts.

The retention and management of existing trees to encourage health and longevity is also vital since mature trees provide greatly more benefits than young, developing trees. (Hand, K,L & Doick K,J *Understanding the role of urban tree management on ecosystem services*, 2019, Forest Research)

2. It is concerning that the applicant is not proposing to plant any replacement trees *'as there are already so many trees on site'*. This is a weak and simplistic argument, and not supported by a reference to an existing mature privet/laurel hedge as mitigation for the 24 trees to be felled.

Non-native Cherry Laurel is considered an invasive species of high impact as it kills off native plants and is spread easily to woodland where it becomes a nuisance.

The Local Planning Authority has a duty to ensure that adequate provision is made for the preservation of trees and the planting of new ones.

When an application for tree removal is made, the landowner has a duty to replace the tree(s) with a 'standard' of the same species, in the same location and within the next planting season.

In view of the increasing awareness of the low level of tree planting taking place in Havant borough Tree Officers may agree to different locations where 24 replacements will be very appreciated.

The i-Tree Canopy coverage survey results of 2016 recorded Havant Town as having a very low 'Tree Cover' count, for its size, of 10.8% compared with Winchester 27.4%, Eastleigh 22.0%, Southampton 19.8% and Petersfield 16.2%. (See Appendix A, *The Canopy Cover of England's Towns and Cities: base lining and setting targets to improve human health and well-being*. Forest Research et al)

The Havant Town percentage is only slightly improved across the Borough by taking into account areas such as Hollybank Woods.

Clearly nowadays we need to be seen to be protecting our existing trees, especially those in a larger grouping, and only agreeing to 'felling and replacement' on the basis of acceptable reasons.

3. The applicant claims there is no current or future public amenity benefit as *'the woodland trees are not visible from a public place'*.

While current TPO regulations do depend on a reasonable degree of public benefit, (normally accepted as visibility from a public place), other features can be considered: for example:

'the trees, or at least part of them, should therefore normally be visible from a public place, such as a road or footpath, although, exceptionally, the inclusion of other trees may be justified. The benefit may be present or future; trees may be worthy of preservation for their intrinsic beauty or for their contribution to the landscape or because they serve to screen an eyesore or future development; the value of trees may be enhanced by their scarcity; and the value of a group of trees or woodland may be collective only. Other factors, such as importance as a wildlife habitat, may be taken into account.'

4. The removal of 24 trees is substantial and sufficient to impact on local biodiversity and ecology in ways not yet assessed. For example, have surveys been carried out regarding protected species potentially associated with the 24 trees?

A very significant assemblage of bat species, including the rare Bechstein, barbastelle, and alcahoie are on record in the local area.

5. The Urban Forest* is a big element of- a community's green infrastructure, providing significant environmental benefits, including carbon storage, air pollution removal, air cooling, reduction of surface water flooding, and habitat resources for our rapidly depleting biodiversity.

These previously unappreciated benefits that trees provide are now being valued as financial assets by software systems such as CAVAT and i-Tree, that are increasingly being adopted to reflect a truer value of trees than the older TEMPO system which Havant Borough Council unfortunately still has to rely on.

Awareness of our reliance on trees for these benefits (*'environmental goods'*) and increasing concerns about the effects of Climate Crisis means a wider community now wants to ensure the resilience of their urban forest for the future. Tree Preservation Orders (issued by all local authorities), are the only means by which Havant Borough Council can protect our urban forest as a core part of our borough's green infrastructure.

The attached Optimal Tree Life Span document demonstrates that premature removal of a tree deprives the community of 75% of the potential environmental goods can deliver.

**The urban forest is made up of all trees in towns and cities including:*

- *along linear transport routes and waterways - eg canals and rivers*
- *in amenity areas*
- *in urban woodlands*
- *in parks and informal open spaces*
- *along streets*
- *in domestic gardens*
- *on institutional land*

In conclusion

I note that Jamie Gargett, HBC Arb Manager and Maria Stewart, HBC Arb Officer visited the site together for a walk-through assessment as is standard practice, but it is quite concerning that the applicant sees fit to report their definite willingness support the application.

The Borough's Arboriculture department is thoroughly professional. Its officers will be aware that casual comments of this nature during the public consultation period of any application only serve to undermine the democratic process, and that their decision should be only be formed once all stake holder comments, observations and evidence is assembled.