

From: Carle, Shona (Trees and Woodlands Officer)

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Sent: 23 November 2024 11:49

To: Quinn, Vicky (Senior Planning Officer) <Vicky.Quinn@newport.gov.uk>

Subject: 24/0756 | THE CONSTRUCTION OF 30NO AFFORDABLE HOUSING APARTMENTS AND ASSOCIATED EXTERNAL WORKS AND PARKING | Land Formerly Known As 21 Kelvedon Street Newport

Hello Vicky,

There are objections to this application .

There are Council owned and maintained trees that are situated in both Witham and Feering Street which have a bearing on the site .

All Council tree stock is protected by NCC Tree policies .

There are design conflicts with the existing street trees for example the increased RPAs (Root Protection Areas) which will extend well into the proposed site as tree roots will not be under the highway area ie where the proposed building is (Robinia?) and where the proposed car parking is (2x lime ? trees) - see images below .

Trees bordering a development site must be considered in line with BS5837:2012

In addition there appears to be boundary walls bisecting the RPAs of the plane trees which is unacceptable .

The trees do not appear to be plotted accurately on the layout plan.

Car parking by large trees is always unacceptable eg potential storm damage and branch fall together with leaf fall, aphids and roots causing problems with surfacing and creating trip hazards .

All of which will put pressure on the Council owned trees to be cut back /removed - there is plenty of planning history to evidence this .

The RPAs are exclusion areas and there should not be any walls ,service trenches, walls , landscaping or anything else within the RPAs and submitted plans should evidence this .

All trees/hedgerows must be accurately plotted all trees should be annotated on every layout plan.

Any Suds proposals should be well away from the trees and should be indicated on the layout plan.

Full tree/woodland edge /hedge and boundary tree information should be submitted in accordance with BS 5837:2012 by a bona fide Tree Consultant - see attached list of procurement approved NCC Tree Consultants

Trees both inside and bordering the site should be included.

BS5837:2012 Root Protection Area (RPA)

The Root Protection Area (RPA) gives a mathematical and theoretical circular rooting area for each tree based on the diameter of the trunk of an individual tree.

However, the above ground constraints as specified in BS:5837:2012 must also be evaluated when considering the proposed development layout in relation to trees .

NB/ the RPA is the not the nearest point to a tree that “development” can take place.

BS5837:2012 Constraints posed by existing trees (in relation to existing trees/hedges and woodlands)

It needs to be evidenced that this has been undertaken by the Tree Consultant

5.2 Eg the current and ultimate height and spread of the tree.

Tree species, foliage density, aphid exudate, branch drop etc.

Effect of shading from trees.

5.2.3 Working and access space needs consideration

“ the requirement to protect the overhanging canopies of trees where they could be damaged by machinery, vehicles, barriers or scaffolding where it will be necessary to increase the extent of the tree protection barriers to contain the canopy “ ie by increasing the RPAs

5.2.4 “particular care is needed regarding the retention of large, mature, over mature or veteran treesadequate space should be allowed for their long term physical retention and future maintenance”

To re iterate the trees should inform the design layout and not vice versa, all potential conflicts between the proposed buildings and the trees should be designed out. The health, safety and longevity of the trees should not be compromised by a development.







Newport City Council's Climate Change Emergency declared

“in November (2021) Newport Council declared an ecological and climate emergency that recognised the need to protect Newport’s local environments and reduce carbon emissions across the City. The motion would ensure that all future decisions and policies made by Newport Council would be integrated across all areas of Council activity and the Council would lead by example through partnership working.”

Relevant policies :-

Planning Policy Wales

2.1 Planning Policy Wales (PPW) provides the national strategic guidance with regard to land use planning matters in Wales. Sustainable Development Principles are inherent to national planning policy which expects all those involved in the planning system to adhere to those SD Principles. Of particular relevance in this case is the need to ensure a long term perspective to safeguard the interest of future generations, to respect environmental limits so that the environment is not irreversibly damaged and to assist in tackling climate change. This can be achieved through good design of development which takes into account the relationship between the natural and built environment.

Technical Advice Note 12 Design (2016)

2.5 This advice note states the response to context should not be confined to architectural finishes. It is important to help integrate old and new development and reinforce hierarchy between spaces through the consideration of retaining existing landmarks, mature trees and hedgerows within housing areas as well as introducing new planting appropriate to the area. The guidance notes that opportunity should be taken when improving the public realm to protect and enhance biodiversity and assist pollution abatement through careful design, implementation and maintenance of planting. Planting, particularly large tree species can also be used to improve microclimate and reduce dust and the perception of noise through, shade, shelter and screening.

[Well-being of Future Generations \(Wales\) Act 2015](#)

Long term: A greener city is a healthier city environmentally, and encourages investment and employment opportunities. Natural green space supports social resilience and community wellbeing, making the environment healthier for both people and wildlife.

Planning decisions aim to build sustainable and cohesive communities in both the built and green environment.

Prevention: Sound decisions help promote a greener environment, via TPOs for trees and woodlands and hedgerows, and reduces the loss of trees and woodlands and hedgerows on private land. Trees and woodlands and

hedgerows are essential in the fight against climate change, as they sequester carbon, and assist with increased biodiversity.

Local Development Plan 2011-2026.

Policy GP5: General Development Principle, Natural Environment,

Criterion vii):

[DEVELOPMENT WILL BE PERMITTED WHERE] THE PROPOSAL INCLUDES APPROPRIATE TREE PLANTING OR RETENTION WHERE APPROPRIATE AND DOES NOT RESULT IN THE UNACCEPTABLE LOSS OF OR HARM TO TREES, WOOLDAND OR HEDGEROWS THAT HAVE WILDLIFE OR AMENITY VALUE.

GP2 General Development Principles “ *there will not be an adverse effect on local amenity*” - is relevant

Cofion Cynnes / Kind Regards,

Shona Carle

Swyddog Coed / Tree Officer (TPOs & Private Land)

Cefn gwlad a Chadwraeth/ Countryside & Conservation

Gwasanaethau'r Ddinas / City Services

Cyngor Dinas Casnewydd / Newport City Council

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