

Barrell Tree Consultancy - Jeremy Barrell - BSc FArborA DipArb CBiol FICFor FRICS

Review of the proposed planning policy changes published by the Royal Borough of Kensington and Chelsea and advise on the reliability of the tree related information.

Executive Summary

- In August 2013 Barrell Tree Consultancy made representations relating to the tree aspects of the proposed planning policy changes. The 2013 consultation documents consisted of the Alan Baxter Residential Basement Study Report and the RBKC Basements Publication Planning Policy.
- The Alan Baxter Report contains specific and detailed comments on tree issues; however there is no record of that advice being verified by a qualified tree professional or of the author having any tree-related credentials.
- The apparent failure of RBKC, to seek professional advice on the tree issues, has resulted in a misleading position based on lay opinion to influence the emerging policy.
- There was three main areas where the lay analysis of the tree issues was flawed because there was no credible evidential support for:
 1. Changing the maximum basement area coverage of gardens from the current limit of 85% down to 50%;
 2. The RBKC position that a depth of soil of 1m above basements will not sustain substantial mature trees; and
 3. The RBKC position that excavating beneath existing trees is not acceptable
- In response to those representations, RBKC has now published two further documents, along with other supporting investigations, that are the subject of the further representations in this Report. This consultation exercise was to seek representations on the soundness of the current proposals (Feb 2014).
- My analysis identified that there was little substantive change from the previous documents. There still remain multiple reasons why the approach and the conclusions presented by RBKC on the matter of basements near trees is unsound.
- RBKC has not provided any compelling evidence or credible reasoning to justify its position that a new upper limit of basement coverage of 50% of the garden area is now necessary, compared to the existing 85% rule; or that that such an approach with a 1m depth of soil above will not sustain substantial mature trees; or that excavating beneath existing trees is not acceptable.
- In the absence of such evidence and explanations, my opinion is that the proposed policy revision is not sound and needs reworking to accurately and reliably reflect the current state of knowledge on these matters.