

Arboricultural Implications Report

Proposed re-development at

Land to the northwest of Factory Road

Northfleet

Kent



June 2025

Ref. SJA air 25265-01a

SUMMARY

S1. On the basis of our assessment, we conclude that the arboricultural impact of this scheme is of negligible magnitude, as defined according to the categories set out in **Table 1** of this report.

S2. Our assessment concludes that there are no mature, ancient, veteran or notable trees, no category 'A' or 'B' trees, and no trees of high landscape or biodiversity value at the site and none are to be removed. The proposed partial removal of one group of trees (G15) constitutes nothing more than the clearance of self-seeded buddleia and young sycamore, the loss of which will represent no alteration to the arboricultural character and appearance of the local landscape.

S3. The proposed pruning is minor in extent, will not detract from the health or appearance of these trees, and complies with current British Standards.

S4. The incursions into the Root Protection Areas of trees to be retained are minor, and subject to implementation of the measures recommended on the Tree Protection Plan and set out at **Appendix 2** no significant or long-term damage to their root systems or rooting environments will occur.

S5. As the proposed development will not result in the removal of trees which are features of the landscape and contribute to, conserve or enhance the landscape character of the surrounding area, it complies with Policies CS12 and CS19 of the Gravesham Borough Council Local Plan Core Strategy.

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1. INTRODUCTION AND BACKGROUND INFORMATION

1.1. Instructions

1.1.1. SJAtrees has been instructed by Bellway Homes Limited (Thames Gateway) to visit the land to the northwest of Factory Road, Northfleet, and to survey the trees growing on or immediately adjacent to this site.

1.1.2. We are further asked to identify which trees are worthy of retention within the site; to assess the implications of the development proposals on these specimens, and to advise how they should be protected from unacceptable damage during construction.

1.2. Scope of report and planning history

1.2.1. This report and its appendices reflect the scope of our instructions, as set out above. It is intended to accompany a planning application to be submitted to the Ebbsfleet Development Corporation (EDC) and Gravesham Borough Council (GBC) as the application falls across the jurisdiction of both (and which together constitute the LPA); and complies with local validation requirements, and with the recommendations of British Standard BS 5837:2012, *Trees in relation to design, demolition and construction – Recommendations* ('BS 5837').

1.2.2. The site was previously included within an outline planning application (ref: EDC/16/0004) for mixed development of the land at the former Northfleet Cement Works, which was granted planning permission by the LPA in June 2018.

1.2.3. Pursuant to the outline permission, a reserved matters application (ref: EDC/20/0076) for the erection of 3No. dwellings at the site was subsequently submitted to the LPA in June 2020 and granted planning permission in December 2020. However, following further evolution of the project, the three dwellings approved at the reserved matters stage are no longer appropriate.

1.2.4. Where applicable, details of this report supersede those of the approved arboricultural report *SJA air + APPs 20235-01a*, dated May 2020, submitted as part of the previous reserved matters application.

1.2.5. The proposed development comprises the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.

1.2.6. This report summarises and sets out the main conclusions of the baseline data collected during the tree survey and identifies those trees or groups of trees whose removal could result in a significant adverse impact on the character or appearance of the local area (Section 3). It then details and assesses the impacts of the proposed development on individual trees and groups of trees, including those to be removed (Section 4), those to be pruned (Section 5), and those which might incur root damage that might threaten their viability (Section 6). A summary and conclusion, with regard to local planning policy, are presented in Section 7.

1.3. Site inspection

1.3.1. A site visit and tree inspection which included all the trees growing within and adjacent to the area incorporated by the full site ownership boundary of the former Northfleet Cement Works, were undertaken by Anthony Harte and James Bradford of SJAtrees on Tuesday the 7th April 2020. Weather conditions at the time were clear, dry and bright. Deciduous trees were in partial leaf.

1.3.2. A resurvey of the site was undertaken by Anthony Harte on Wednesday the 14th May 2025. Weather conditions at the time were clear, dry and bright. Deciduous trees were in full leaf.

1.4. Site description

1.4.1. The site (as delineated by the red line in **Figure 1** below) is located on the west side of Factory Road. This road is characterised by terraced houses which lie opposite the site's east boundary and which adjoin its south boundary. The west and north boundaries are contiguous with the land comprising the former cement works.

1.4.2. The River Thames is located 375m to the north whilst the surrounding landscape to the east, south and west is characterised by a mix of suburban housing occasionally interspersed with industrial buildings, the latter being particularly prevalent along the river.



Figure 1: Site location shown on aerial satellite image

1.4.3. The site is on relatively level ground and comprises derelict wasteland with self-seeded vegetation.

1.5. Soil type

1.5.1. The British Geological Survey Solid and Drift Geology map of the area indicates the site lies on superficial deposits of sand and gravel above a bedrock of chalk.

1.5.2. Whilst no site investigation or soil analysis has been undertaken, the British Geological Survey map suggests that the soil is unlikely to be particularly susceptible to compaction.

1.6. Statutory controls

1.6.1. At the time of writing none of these trees are covered by a tree preservation order (TPO).

1.6.2. The site is not within a conservation area, and therefore there are no constraints relating to existing trees in this regard.

1.6.3. There are no hedgerows on site that could meet the criteria to be deemed “Important” in the context of the landscape and wildlife criteria of the Hedgerows Regulations, 1997¹.

1.7. Non-statutory designations

1.7.1. There are no woodlands within or abutting the site that are classified as ‘Ancient’. Ancient woodland is defined as “any area that’s been wooded continuously since at least 1600 AD” and is considered an important and irreplaceable habitat.

1.7.2. There are no trees within or abutting the site that can be classified as ‘Ancient’ or ‘Veteran’. Ancient and veteran trees are also considered to be irreplaceable habitats, and contribute to a site’s biodiversity, cultural and heritage value, and the National Planning Policy Framework (see below) states that development resulting in the loss or deterioration of ancient or veteran trees should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

¹ The Hedgerows Regulations 1997; STATUTORY INSTRUMENTS 1997 No. 1160.

2. PLANNING CONTEXT

2.1. National policy context

2.1.1. Under Section 197 of the Town and Country Planning Act 1990, local authorities have a statutory duty to consider the protection and planting of trees when considering planning applications. The effects of proposed development on trees are therefore a material consideration, and this is normally reflected in local planning policies.

2.1.2. The National Planning Policy Framework (‘NPPF’)² sets out the Government’s planning policies for England and how these should be applied in both plan and decision-making. Paragraph 2 makes it clear that the NPPF is itself a material consideration in the determination of planning application. Paragraph 11 states that **“Plans and decisions should apply a presumption in favour of sustainable development.”**

2.1.3. In paragraph 135, within Section 12 “Achieving well-designed places” the NPPF states: **“Planning policies and decisions should ensure that developments:**

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;**
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;**
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);**
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;**

² The National Planning Policy Framework (NPPF) (December 2024). Department for Levelling Up, Housing & Communities

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

2.1.4. Paragraph 136 in this section states: **“Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.”**

2.1.5. The section titled **“Meeting the challenge of climate change, flooding and coastal change”** states at paragraph 162: **“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures . Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”**

2.1.6. In paragraph 187, within Section 15 **“Conserving and enhancing the natural environment”** the NPPF states: **“Planning policies and decisions should contribute to and enhance the natural and local environment by:**

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

[...] d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; [...]

2.1.7. In paragraph 193, under the ‘Habitats and biodiversity’ section, the NPPF states: **“When determining planning applications, local planning authorities should apply the following principles:**

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists....”

2.2. Local policy context

2.2.1. Whilst the local planning authority for this area is the Ebbsfleet Development Corporation, the relevant local planning policies are contained in the Gravesham Borough Council Local Plan Core Strategy (adopted September 2014).

2.2.2. The relevant sections of Policy CS12: Green Infrastructure, of the Local Plan Core Strategy state:

2.2.3. **“5.7.25. Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.**

2.2.4. **5.7.26. The overall landscape character and valued landscapes will be conserved, restored and enhanced.....”**

2.2.5. The relevant sections of Policy CS19: Development and Design Principles, of the Local Plan Core Strategy state:

2.2.6. **“5.15.14. New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:**

Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place.”

2.3. Neighbourhood policy context

2.3.1. At the time of writing there is no Neighbourhood Plan covering the area within which the site is found.

3. THE TREES

3.1. Survey findings

3.1.1. We surveyed six individuals (nos. 1-6) and two groups of trees (G15 and G17) growing within or immediately adjacent to the site. Their details are found in the tree survey schedule at **Appendix 3**.

3.1.2. The arboricultural character of the site is defined by four sycamores (nos. 1-4) and one ash tree (no. 5) growing off-site along the existing boundary wall at an elevation 700mm higher than the on-site ground level and which constitute the main components of group G15. All five individuals have previously been felled or heavily pruned at 2m and the resultant young regrowth that has arisen from the stumps and pruning points now constitute the crowns of the trees. As such, these specimens are of especially low arboricultural quality and are in keeping with the derelict nature of the site. The remainder of group G15 comprises a mix of self-seeded buddleia and young sycamore growing in a scrubby mass adjacent to the site's south boundary.

3.1.3. By comparison, the adjacent off-site group of trees (G17) growing south-west of the site, is taller and more established and is dominated by semi-mature self-sown sycamore with an understorey of hawthorn and apple, growing densely together. However, the site's neglected character persists into group G17 which shows evidence of having been used regularly for fly-tipping.

3.2. Assessment of suitability for retention

3.2.1. As noted above in Section 2.3, local planning policies require the retention of trees that conserve and enhance the "landscape character and valued landscapes" of the surrounding area. We consider none of the trees or groups of trees as being of sufficient arboricultural quality or prominence in the landscape as to meet these criteria.

3.2.2. All six individuals (nos. 1-6) and both groups G15 and G17 have been assessed as category 'C,' being of low quality, very limited merit, only low landscape benefits, no material cultural or conservation value and only limited or short-term potential.

3.3. Assessment of arboricultural impacts

3.3.1. The arboricultural impacts of the proposed landscape layout by LUC Landscape Architects, drawing no. 13281-LUC-TW-XX-DR-L-1001 rev P04 have been assessed by overlaying this onto the TCP, are discussed in the following sections of this report and are shown on the tree protection plan (TPP) presented at **Appendix 4**.

3.3.2. The TPP identifies one group of trees (G15) to be partially removed to accommodate the proposed development. This is shown by means of a **red dashed canopy line** on the TPP.

3.3.3. The TPP also shows how trees to be retained will be protected from damage during construction, and the measures identified are set out and described in the outline arboricultural method statement at **Appendix 2** of this report. The implementation of, and adherence to, these measures can readily be secured by the imposition of appropriate planning conditions.

3.3.4. Details of the impacts identified within these categories, and our assessment of their respective significance, are analysed in Sections 4 to 6 below.

3.3.5. Based on these findings, we have assessed the magnitude of the overall arboricultural impact of the proposals according to the categories defined in **Table 1** below.

Impact	Description
High	Total loss of or major alteration to main elements/ features/ characteristics of the baseline, post-development situation fundamentally different
Medium	Partial loss of or alteration to main elements/ features/ characteristics of the baseline, post-development situation will be partially changed
Low	Minor loss of or alteration to main elements/ features/ characteristics of the baseline, post-development changes will be discernible but the underlying situation will remain similar to the baseline
Negligible	Very minor loss of or alteration to main elements/ features/ characteristics of the baseline, post-development changes will be barely discernible, approximating to the 'no change' situation

Table 1: Magnitude of impacts³

³ Determination of magnitude based on DETR (2000) Guidance on the Methodology for Multi-Modal Studies, as modified and extended.

4. TREES TO BE REMOVED

4.1. Details

4.1.1. To accommodate the proposed development, as shown on the proposed layout plan, one group (G15) is to be partially removed.

4.2. Assessment

4.2.1. The partial removal of group G15 comprises the clearance of self-seeded buddleia and young sycamore only, the loss of which will not have any detrimental impact on the character and appearance of the local landscape, or to its amenity or biodiversity.

4.2.2. Owing to group G15's significantly low arboricultural quality and failure to make any meaningful contribution to the landscape or biodiversity, it is likely that its partial removal with the provision of replacement planting would have been recommended on the grounds of good arboricultural management alone, regardless of whether the proposed development necessitated it or not.

4.2.3. The proposals incorporate replacement tree planting. This will mitigate the proposed removals, improve the age class balance of the trees on site, enhance the local landscape, and re-establish a framework for the ongoing and long-term character of the site.

4.2.4. In the light of these considerations, and taking account of the numbers, sizes and locations of the trees to be retained, including those that are off-site, the partial removal of group G15 will represent no alteration to the local character or appearance of the site.

5. TREES TO BE PRUNED

5.1. Details

5.1.1. Five trees to be retained are to be pruned to facilitate implementation of the proposals. These are shown at **Table 2** below.

Tree no.	Species	Age class	Proposed works
1	Sycamore	Semi-mature	Reduce north crown extent by up to 2m to allow for construction space and clearance from proposed parking bays
2	Sycamore	Semi-mature	Reduce north crown extent by up to 1m to allow for construction space and clearance from proposed parking bays
3	Sycamore	Semi-mature	Reduce north crown extent by up to 2.5m to allow for construction space and clearance from proposed parking bays
4	Sycamore	Semi-mature	Reduce north crown extent by up to 3.5m to allow for construction space and clearance from proposed parking bays
5	Ash	Semi-mature	Reduce north-east crown extent by up to 2m to allow for construction space and clearance from proposed parking bays

Table 2: Trees to be pruned to facilitate development

5.1.2. None of the trees growing off-site in group G17 overhang the site such that they would require pruning to facilitate implementation of the proposals.

5.2. Assessment

5.2.1. The pruning proposed to the trees listed in **Table 2** comprises nothing more than the cutting back of small-sized epicormic regrowth. As such, branches to be removed from each tree will result in maximum wound sizes no greater than 100mm in diameter; this will have an insignificant effect on the health and physiological condition of these trees and complies with the recommendations at paragraph 7.2.4 and at Table 1 of British Standard BS 3998:2010, *Tree work – Recommendations*.

5.2.2. The pruning back to the boundary of trees is consistent with the common law legal right to cut un-protected off-site trees back to one's boundary. Consequently, these works are not required just because of the proposed development: they could legally be undertaken irrespective of this scheme and could be repeated whatever the future use of the site. Indeed, as these trees have been heavily pruned in the past, the proposed re-pruning as part of the proposals is consistent with their previous management.

5.2.3. The previous heavy pruning of the trees has significantly diminished their arboricultural quality and landscape value, and so the proposed re-pruning of their crowns will not result in any significant harm to the trees' form, potential or amenity value beyond that which has already occurred. In any event, the proposed re-pruning will be largely screened in views by the remainder of the trees' canopies and by the proposed building; and so it will therefore have little effect on the appearance of the trees when viewed from outside the site itself.

5.2.4. Following the pruning specified, there will be adequate working space for construction, and a reasonable margin of clearance for future growth.

5.2.5. The crowns of the trees are expected to regrow and so it is likely that they will require further re-pruning in the future to maintain clearance from the proposed parking bays and building. However, such re-pruning is expected to comprise nothing more than the repeated cutting back of small-sized epicormic regrowth on a cyclical basis, which in view of the trees' low quality and landscape value, will not result in significant adverse impacts on their long-term viability or contribution to the appearance of the area.

6. ROOT PROTECTION AREA INCURSIONS

6.1. Details

6.1.1. To ascertain whether the proposals will cause any significant harm to the roots or the rooting environments of the trees to be retained, we have calculated the root protection areas ('RPAs') of these specimens, in accordance with the criteria set out in section 6 of the British Standard BS5837: 2012. The RPA is defined in this document as a "layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability; and where the protection of the roots and soil structure is treated as a priority".⁴

6.1.2. Consequently, a tree within the RPA of which no disturbance will occur can be regarded as one that will not suffer any significant or long-lasting harm because of the proposals and will therefore remain 'viable'. However, as the Standard makes clear⁵, some disturbance within its RPA does not mean that a tree will necessarily suffer significant harm or cease to be viable; this will depend on several factors, including the extent and nature of the disturbance; the age, species and physiological condition of the tree; the morphology, disposition and depth of the roots; the type and structure of the soil; and the extent of mitigation measures undertaken. Accordingly, an assessment of these criteria may mean that an RPA incursion can be justified.

6.1.3. Parts of the proposed hard surfacing and wall will encroach within the RPAs of three of the trees to be retained. These are shown in **Table 3** below.

⁴ British Standard BS 5837:2012. Trees in relation to design, demolition and construction – Recommendations; para. 3.7.

⁵ Ibid., para 5.3.1.

Tree no.	Species	Incursion by:	Total RPA	Extent of incursion into RPA	% of RPA
1	Sycamore	Proposed car parking bays and wall	35.5m ²	6.8m ²	19.2%
2	Sycamore	Proposed car parking bays, and wall	18.1m ²	1.7m ²	9.2%
3	Sycamore	Proposed car parking bays, kerb and wall	46.4m ²	10m ²	21.5%
4	Sycamore	Proposed car parking bays, kerb and wall	40.3m ²	5.6m ²	14.0%
5	Ash	Proposed car parking bays, kerb and wall	54.4m ²	1.7m ²	3.0%

Table 3: Proposed incursions within RPAs

6.2. Assessment

6.2.1. The incursions by parts of the proposed car parking bays, kerb and wall into the RPAs of the five trees listed at **Table 3** equate to no more than 21.5% of individual RPAs. Any potential adverse impacts can be satisfactorily mitigated as set out below.

6.2.2. Subject to proposed levels, construction of the proposed car parking bays, kerb and wall within the RPAs of trees nos. 1-5 will require some degree of excavation. To minimise impacts on these specimens, excavation within the RPAs will be undertaken manually, under the direct control and supervision of an appointed arboricultural consultant, so that any over dig into the RPAs is avoided, and any roots encountered can be treated appropriately.

6.2.3. The proposed hard surfacing and wall are expected to have relatively shallow foundations and as such, it is unlikely that excavation within RPAs will be required to depths greater than 500mm below existing ground level. As studies have shown that typically as much as 90% of tree root length occurs in the upper metre of the soil⁶, it is therefore highly unlikely that these incursions into the RPAs will result in all the roots in these areas being severed. For example, as only the upper 500mm of the upper metre of soil will be removed, the 21.5% incursion into the RPA of sycamore tree no. 3 may result in a reduction of only 12% of roots within the RPA.

6.2.4. As the site comprises compacted, derelict land, it is reasonable to surmise that the ground within the site constitutes a poor rooting environment, and that

⁶ Roberts J., Jackson N., & Smith M. (2006). Tree Roots in the Built Environment. TSO.

consequently the trees are more likely to be rooting favourably within the rear gardens to the south and the bank to the west. Considering the restrictions to rooting within the site, combined with the relatively shallow extent of excavation required (discussed above), it is therefore unlikely that excavation will encounter, or necessitate the severing of, any significant sized roots or significant volume of roots.

6.2.5. As species, both ash and sycamore have been identified as moderate at tolerating root pruning and disturbance⁷. As these specimens are semi-mature and of average physiological condition, there is no reason to suggest that they will not be able to tolerate the cutting of roots within these small sections of their RPAs.

6.2.6. The areas lost to encroachment within the RPAs of these trees can be compensated for in the areas to the south and west of the trees, where there is soft landscaping suitable for root growth, contiguous to the RPAs. Therefore, there will be no net loss of suitable rooting area, and no foreseeable risk of future cumulative impacts, so there is no reason to suggest that they will not be able to tolerate the cutting of roots within these small sections of their RPAs or that they will not remain viable.

6.2.7. As these trees can remain viable by being able to root in other areas, contiguous to their RPAs, these incursions comply with paragraph 5.3.1 of BS5837.

6.2.8. As the incursions into the RPAs of the trees by proposed hard surfacing alone extends to no more than 16% of individual RPAs (in the case of tree no. 3), they do not exceed the 20% maximum incursion into currently unsurfaced ground recommended in BS 5837⁸.

6.2.9. Implementation of measures to prevent other incursions into the RPAs of retained trees and to protect them during construction can be assured by the erection of appropriate site hoarding which can be used as protective fencing, as shown on the TPP at **Appendix 4**.

⁷ MATHENY, N. P. and CLARK, J. R. (1998). Trees and Development. International Society of Arboriculture.

⁸ BS 5837, paragraph 7.4.2.3.

6.2.10. Accordingly, subject to implementation of the above measures, and considering the ages, current physiological condition and tolerance of disturbance of these retained trees, no significant or long-term damage to their root systems or environments will occur as a result of the proposed development.

7. CONCLUSIONS

7.1. Summary

7.1.1. Our assessment concludes that there are no mature, ancient, veteran or notable trees, no category 'A' or 'B' trees, and no trees of high landscape or biodiversity value at the site and none are to be removed. The proposed partial removal of one group of trees (G15) constitutes nothing more than the clearance of self-seeded buddleia and young sycamore, the loss of which will represent no alteration to the arboricultural character and appearance of the local landscape or to its amenity or biodiversity.

7.1.2. The proposed pruning is minor in extent, will not detract from the health or appearance of these trees, and complies with current British Standards.

7.1.3. The incursions into the Root Protection Areas of trees to be retained are minor, and subject to implementation of the measures recommended on the Tree Protection Plan and set out at **Appendix 2** no significant or long-term damage to their root systems or rooting environments will occur.

7.2. Compliance with national planning policy

7.2.1. As only one group of trees of low arboricultural quality is to be partially removed, the site's arboricultural attractiveness, history and landscape character and setting will be maintained, thereby complying with Paragraph 135 of the National Planning Policy Framework.

7.2.2. As the proposals will not result in the loss or deterioration of any ancient woodland or any ancient or veteran trees, they comply with paragraph 193 (c) of the NPPF.

7.3. Compliance with local planning policy

7.3.1. As the proposed development will not result in the removal of trees which are features of the landscape and contribute to, conserve or enhance the landscape character of the surrounding area, it complies with Policies CS12 and CS19 of the Gravesham Borough Council Local Plan Core Strategy.

7.4. Conclusion

7.4.1. On the basis of our assessment, we conclude that the arboricultural impact of this scheme is of negligible magnitude, as defined according to the categories set out in **Table 1** of this report.

APPENDIX 1

Methodology

A1.1. Tree survey and baseline information

A1.1.1. We surveyed individual trees with trunk diameters of 75mm and above⁹, trees with trunk diameters of 150mm and above growing in groups or woodlands, and shrub masses, hedges and hedgerows¹⁰ growing within or immediately adjacent to the site and recorded their locations, species, dimensions, ages, condition, and visual importance in accordance with BS 5837 recommendations.

A1.1.2. The baseline information collected during the site survey was recorded on site using a hand-held digital device. This information was then imported into an Excel spreadsheet and used to produce the tree survey schedule at **Appendix 3**. The numbers assigned to the trees in the tree survey schedule correspond with those shown on the appended tree protection plan.

A1.1.3. We surveyed trees as groups where they have grown together to form cohesive arboricultural features, either aerodynamically (trees that provide companion shelter), visually (e.g., avenues or screens) or culturally¹¹. However, where it might be necessary to differentiate between specific trees within these groups, we also surveyed these individually.

A1.1.4. We inspected the trees from the ground only, aided by binoculars as appropriate, but did not climb them. We took no samples of wood, roots or fungi. We did not undertake a full hazard or risk assessment of the trees, and therefore can give no guarantee, either expressed or implied, of their safety or stability.

A1.1.5. Whilst we categorised the trees in accordance with BS 5837 (details of the criteria used for this process can be found in the notes that accompany the tree survey schedule), we assessed the trees' suitability for retention against national, regional and local planning policies. We applied this methodology in line with the NPPF's presumption in favour of sustainable development, giving greater weighting to the contribution of a tree to the character and appearance of the local landscape, to amenity, or to biodiversity, where its removal might have a significant adverse impact on these factors.

A1.1.6. For the trees shown to be retained, all measurements for pruning specifications, percentage estimates of RPA incursions and shading issues have been calculated using AutoCAD software.

A1.2. Tree constraints

A1.2.1. In line with the NPPF's presumption in favour of sustainable development, we assessed whether any trees should be retained in the context of the proposed development / re-development. Our assessment of which trees might have to be retained, and which can be removed, is based on:

9 BS 5837, paragraph 4.2.4 b), recommends that all trees over 75mm stem diameter should be included in a pre-planning land and tree survey.

10 Ibid., 4.4.2.7

11 Ibid., 4.4.2.3

- which trees contribute to local character and history, including to the surrounding landscape setting; which trees contribute to biodiversity; and which trees help mitigate and adapt to climate change; and whose removal would thereby be unlikely to comply with national planning policy guidance;
- which trees are significant features of the local landscape, such that their removal would be contrary to local planning policies: specifically, Policy CS12 of the Gravesham Borough Council Local Plan Core Strategy (2014), as set out above; and
- our assessment of the trees' quality, value and remaining life expectancy, in accordance with BS5837:2012, as summarised in the notes that accompany the tree survey schedule;

A1.2.2. As trees growing outside the boundaries of the site are in the control of others, we have assumed they will be retained, irrespective of their size, age or condition.

A1.2.3. Whilst we have categorised trees in accordance with BS 5837, we have not used these categorisations as the main criterion of whether specimens might be removed or should be retained. Trees in categories 'A', 'B' and 'C' are all a material consideration in the development process; but the retention of category 'C' trees, being of low quality or of only limited or short-term potential, will not normally be considered necessary should they impose a significant constraint on development.

A1.2.4. Furthermore, BS 5837 makes it clear that young trees, even those of good form and vitality, which have the potential to develop into quality specimens when mature **"need not necessarily be a significant constraint on the site's potential"**¹².

A1.2.5. Moreover, BS 5837 states that **".... care should be taken to avoid misplaced tree retention; attempts to retain too many or unsuitable trees on a site can result in excessive pressure on the trees during demolition or construction work, or post-completion demands for their removal"**¹³.

A1.2.6. The 'Root Protection Areas' (RPAs)¹⁴ of the trees identified for retention were calculated in accordance with Section 4.6 of BS 5837; and were assessed taking account of factors such as the likely tolerance of a tree to root disturbance or damage, the morphology and disposition of roots as influenced by existing site conditions (including the presence of existing roads or structures), as well as soil type, topography and drainage.

¹² BS 5837, 4.5.10.

¹³ Ibid., 5.1.1.

¹⁴ Ibid., paragraph 3.7. "The minimum area around a retained tree "deemed to contain sufficient roots and rooting volume to maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority."

APPENDIX 2

Outline Arboricultural Method Statement

A1.3. Tree Protection Plan

A1.3.1. The TPP at **Appendix 4** shows the general and specific provisions to be taken during construction of the proposed development, to ensure that no unacceptable damage is caused to the root systems, trunks or crowns of the trees identified for retention. These measures are indicated by coloured notations in areas where construction activities are to occur either within, or in proximity to, retained trees, as described in the relevant panels on the drawing.

A1.4. Pre-start meeting

A1.4.1. Prior to the commencement of any site clearance, ground preparation or construction works the developer will convene a pre-start site meeting. This shall be attended by the developer's contract manager or site manager, the fencing/boarding contractor, the groundwork contractor(s) and the arboricultural consultant. The LPA tree officer will be invited to attend. If appropriate, the tree felling/surgery contractor should also attend. At that meeting contact numbers will be exchanged, and the methods of tree protection shall be fully discussed, so that all aspects of their implementation and sequencing are made clear to all parties. Any clarifications or modifications to the TPP required as a result of the meeting shall be circulated to all attendees.

A1.5. Site clearance

A1.5.1. No clearance of trees or other vegetation shall be undertaken until after the pre-start meeting and after the erection of the tree protection fencing (see below). If any vegetation clearance is required behind the line of the protection fencing this will be made clear at the pre-start meeting and arrangements will be made to do this prior to the fencing's erection, under the supervision of the arboricultural consultant, who will ensure it doesn't cause any soil compaction or damage to the roots of trees to be retained.

A1.5.2. Except where within the RPAs of trees to be retained, all trees and other vegetation to be removed may be cut down or grubbed out as appropriate; but within the RPAs of trees to be retained, trees and vegetation will be cut by hand to ground level and stumps will be either left in place or ground out with a lightweight self-powered stump grinding machine. No excavators, tractors or other vehicles will enter the RPAs.

A1.6. Ground preparation

A1.6.1. No ground preparation or excavation of any kind, including topsoil stripping or ground levelling, shall be undertaken until after the pre-start meeting and after the erection of the tree protection fencing (see below).

A1.6.2. Demolition of existing buildings and removal of existing areas of hard surfacing that abut or overlie RPAs will be undertaken with care, under the control and supervision of an appointed arboricultural consultant, to ensure that the adjacent soil is not unacceptably excavated, disturbed or compacted.

A1.7. Tree protection fencing

A1.7.1. The site hoarding erected around the site boundaries will be used as protective fencing to form a Construction Exclusion Zone (CEZ) around the RPAs of all off-site trees prior to the commencement of construction, thereby safeguarding them from incursions by plant or machinery, storage and mixing of materials, or other construction-related activities which could have a detrimental effect on their root systems.

A1.7.2. Within the CEZs safeguarded by the protective fencing, there will be no changes in ground levels, no soil stripping, and no plant, equipment, or materials will be stored. Oil, bitumen, diesel, and cement will not be stored or discharged within 10m of any trees. Areas for the storage or mixing of such materials will be agreed in advance and be clearly marked. No notice boards, or power or telephone cables, will be attached to any of the trees. No fires will be lit within 10m of any part of any tree.

A1.8. Manual excavation within RPAs

A1.8.1. The first 750mm depth of excavations required within the RPAs of the trees to be retained (as shown by **bold orange lines** on the TPP) will be dug by hand, using a compressed air soil pick if appropriate, and under on-site arboricultural supervision, to safeguard against the possibility of unacceptable root damage being caused to these specimens. Any roots encountered of over 25mm diameter will be cut back cleanly to the face of the dig nearest to the tree, using a sharp hand saw or secateurs, and their cut ends covered with hessian to prevent desiccation.

APPENDIX 3

Tree Survey Schedule



ARBORICULTURAL PLANNING CONSULTANTS

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(Operations)

Tree Survey Schedule

Land to the Northwest of Factory Road, Northfleet

May 2025

SJA tss 25265-01

Tree Survey Schedule: Explanatory Notes

Land to the Northwest of Factory Road, Northfleet

This schedule is based on a tree inspection undertaken by Anthony Harte of SJA Trees (the trading name of Simon Jones Associates Ltd.), on Wednesday the 14th May 2025. Weather conditions at the time were clear, dry and bright. Deciduous trees were in full leaf.

The information contained in this schedule covers only those trees that were examined, and reflects the condition of these specimens at the time of inspection. We did not have access to the trees from any adjacent properties; observations are thus confined to what was visible from within the site and from surrounding public areas.

The trees were inspected from the ground only and were not climbed, and no samples of wood, roots or fungi were taken. A full hazard or risk assessment of the trees was not undertaken, and therefore no guarantee, either expressed or implied, of their safety or stability can be given.

Trees are dynamic organisms and are subject to continual growth and change; therefore the dimensions and assessments presented in this schedule should not be relied upon in relation to any development of the site for more than twelve months from the survey date.

1. Tree no.

Given in sequential order, commencing at "1".

2. Species.

'Common names' are given, taken from MITCHELL, A. (1978) A Field Guide to the Trees of Britain and Northern Europe.

3. Height.

Estimated with the aid of a hypsometer, given in metres.

4. Trunk diameter.

Trunk diameter measured at approx. 1.5m above ground level; or where the trunk forks into separate stems between ground level and 1.5m, measured at the narrowest point beneath the fork. Given in millimetres.

5. Radial crown spread.

The linear extent of branches from the base of the trunk to the main cardinal points, rounded up to the closest half metre, unless shown otherwise. For small trees with reasonably symmetrical crowns, a single averaged figure is quoted.

6. Crown break.

Height above ground and direction of growth of first significant live branch.

7. Crown clearance.

Distance from adjacent ground level to lowest part of lowest branch, in metres.

8. Age class.

Young: Seedling, sapling or recently planted tree; not yet producing flowers or seeds; strong apical dominance.

Semi-mature: Trunk often still smooth-barked; producing flowers and/or seeds; strong apical dominance, not yet achieved ultimate height.

Mature: Apical dominance lost, tree close to ultimate height.

Over-mature: Mature, but in decline, no crown retrenchment

Veteran: Mature, with a large trunk diameter for species; but showing signs of veteranisation, irrespective of actual age, with decay or hollowing, a crown showing retrenchment and a structure characteristic of the latter stages of life.

Ancient: Beyond typical age range and with a very large trunk diameter for species; with extensive decay or hollowing, a crown that has undergone retrenchment and a structure characteristic of the latter stages of life.

9. Physiology.

Health, condition and function of the tree, in comparison to a normal specimen of its species and age.

10. Structure.

Structural condition of the tree – based on both the structure of its roots, trunk and major stems and branches, and on the presence of any structural defects or decay.

Good: No significant morphological or structural defects, and an upright and reasonably symmetrical structure.

Moderate: No significant pathological defects, but a slightly impaired morphological structure; however, not to the extent that the tree is at immediate or early risk of collapse.

Indifferent: Significant morphological or pathological defects; but these are either remediable or do not put the tree at immediate or early risk of collapse.

Poor: Significant and irreparable morphological or pathological defects, such that there may be a risk of failure or collapse.

Hazardous: Significant and irreparable morphological or pathological defects, with a risk of imminent collapse.

11. Comments.

Where appropriate comments have been made relating to:

- Health and condition
- Safety, particularly close to areas of public access
- Structure and form
- Estimated life expectancy or potential
- Visibility and impact in the local landscape

12. Category.

Based on the British Standard "Trees in relation to design, demolition and construction - Recommendations", BS 5837: 2012; adjusted to give a greater weighting to trees that contribute to the character and appearance of the local landscape, to amenity, or to arboricultural biodiversity.

Category U: Trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years.

- (1) Trees that have a serious, irreparable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category 'U' trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning).
- (2) Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline.
- (3) Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality.

Category A: Trees of high quality with an estimated remaining life expectancy of at least 40 years.

- (1) Trees that are particularly good examples of their species, especially if rare or unusual.
- (2) Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features.
- (3) Trees, groups or woodlands of significant conservation, historical, commemorative or other value.

Category B: Trees of moderate quality with an estimated remaining life expectancy of at least 20 years.

- (1) Trees that might be included in category 'A', but are downgraded because of impaired condition (e.g. presence of significant though remediable defects including unsympathetic past management and minor storm damage) such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category 'A' designation.
- (2) Trees present in numbers, usually growing as groups or woodlands, such that they form distinct landscape features, thereby attracting a higher collective rating than they might as individuals; or trees present in numbers but situated so as to make little visual contribution to the wider locality.
- (3) Trees with material conservation or other cultural value.

Category C: Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.

- (1) Unremarkable trees of very limited merit or of such impaired condition that they do not qualify in higher categories.
- (2) Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value, and/or trees offering low or only temporary landscape benefits.
- (3) Trees with no material limited conservation or other cultural value.

TREE SURVEY SCHEDULE

Land to the Northwest of Factory Road, Northfleet

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
1	Sycamore	7.5m	280mm est.	N 3.5m E 4m S 3.5m W 2.5m	N 0.5m	N 0.5m	Semi-mature	Average	Poor	Growing along retaining wall on raised ground 700m higher than site ground level; trunk heavily reduced (pollarded) at 2m height; crown comprises drawn-up regrowth of average 80mm diameter, arising densely from pruning point; significant component of group in which it stands; of low arboricultural quality and limited merit.	C (2)
2	Sycamore	7m	200mm est.	N 2.25m E 2m S 2.5m W 2m	N 0.3m	N 0.5m	Semi-mature	Average	Poor	Growing along retaining wall on raised ground 700m higher than site ground level; trunk heavily reduced (pollarded) at 1.5m height; crown comprises regrowth of average 60mm diameter, arising from trunk; upper 300mm of stem adjacent to pruning point comprises dysfunctional wood; overtopped by adjacent trees; inessential component of the group in which it stands.	C (2)
3	Sycamore	9m	200mm 250mm both est.	N 3.5m E 2m S 4m W 3.5m	N 0m	N 0.5m	Semi-mature	Average	Poor	Growing along retaining wall on raised ground 700m higher than site ground level; twin-stemmed from base with compression fork; stems grow into and around brick rubble lodged between main union; stems also grow into adjacent wire mesh fence; stems heavily reduced (pollarded) at 1.75m height; crown comprises drawn-up regrowth of average 70mm diameter arising densely from pruning points; significant component of group in which it stands; of low arboricultural quality and limited merit.	C (2)
4	Sycamore	10m	2 stems @ 150mm est. 210mm	N 4.5m E 2.75m S 4.5m W 2.5m	N 0m	N 0.5m	Semi-mature	Average	Indifferent	Growing along retaining wall, on raised ground 700m higher than site ground level; three-stemmed from base with tight compression forks; stems heavily reduced between 1m - 1.5m and since regrown to form new crown; drawn-up and mutually suppressed; slightly dominant over adjacent sycamores; significant component of group in which it stands; of low arboricultural quality and limited merit.	C (2)
5	Ash	9m	150mm 10 stems @ 100mm all est.	N 5m E 3.5m S 5m W 4m	N 1m	N 1m	Semi-mature	Average	Indifferent	Growing at site level, on boundary; coppiced; multi-stemmed from base; main unions filled with soil and leaf litter; young, self-seeded sycamore growing amongst stems; one stem to N shows significant dieback; stems x2 to N and E failed at 1m, still attached and aligned W across tree; drawn-up and mutually suppressed to E but dominant over immediately adjacent trees to W; significant component of group in which it stands; of low arboricultural quality.	C (2)
6	Sycamore	12m	300mm est.	N 5m E 4.5m S 4.5m W 6.5m	N 4m	N 4m	Semi-mature	Average	Indifferent	Off-site tree; trunk inaccessible, growing on steep bank; trunk obscured by canopy; trunk and stems partially ivy-covered; significant component of group in which it stands.	C (1)

No.	Species	Height	Trunk diameter	Radial crown spread	Crown break	Crown clearance	Age class	Physio -logy	Structure	Comments	Category
G15	Various	5m	Min 40mm Max 280mm both est.	N 2m E 0.5m S 1m W 0.5m	0m	0m	Semi-mature	Average	Indifferent	Group growing along boundary wall adjacent to Factory Road to E and residential property to S; individuals grow tight against brick wall; E half of group dominated by self-seeded buddleia and young sycamore; W half of group dominated by semi-mature sycamore trees that have been topped out at 2m with the resultant regrowth forming their respective canopies; partially overgrown with brambles and ivy; overall, of scrubby character and of very limited arboricultural merit.	C (2)
G17	Various	15m	Min 95mm Max 375mm both est.	N 4m E 3.5m S 4.5m W 4m	1.5m	2m	Semi-mature	Average	Indifferent	Wooded area used for fly tipping behind properties on Factory Road; located on edge of bank, E of Cement works access; dominated by semi-mature, self-seeded sycamore with an understorey of hawthorn and crab apple; many of the larger individuals within the group are ivy-covered. Of low quality and low value other than as low-level screening.	C (1)

Root Protection Areas (RPAs)

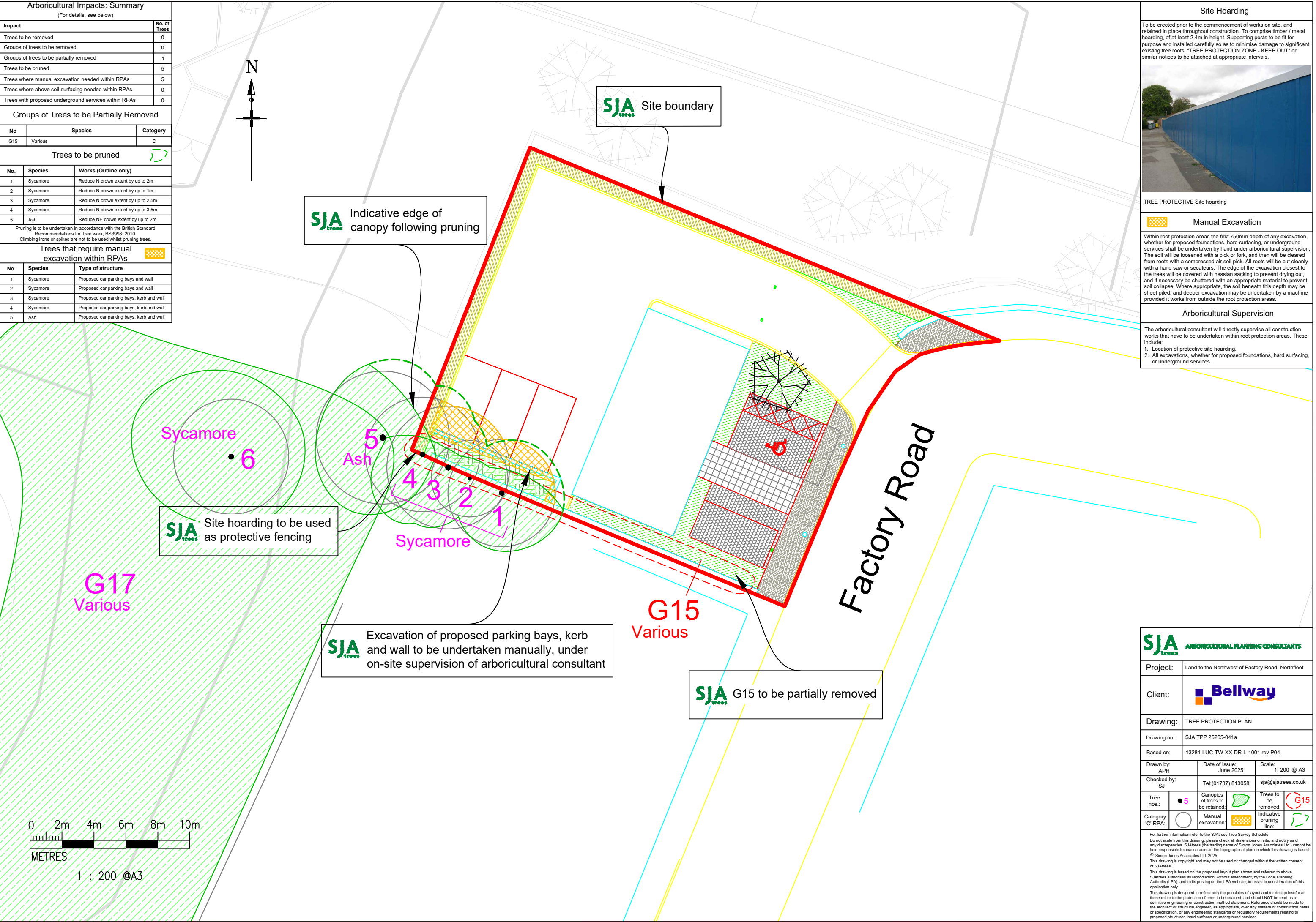
Root Protection Areas have been calculated in accordance with paragraph 4.6.1 of the British Standard 'Trees in relation to design, demolition and construction – Recommendations', BS 5837:2012. This is the minimum area which should be left undisturbed around each retained tree. RPAs are portrayed initially as a circle of a fixed radius from the centre of the trunk; but where there appear to be restrictions to root growth the circle is modified to reflect more accurately the likely distribution of roots.

<i>Tree No.</i>	<i>Species</i>	<i>RPA</i>	<i>RPA Radius</i>
1	Sycamore	35.5m ²	3.4m
2	Sycamore	46.4m ²	3.8m
3	Sycamore	40.3m ²	3.6m
4	Ash	54.4m ²	4.2m
5	Sycamore	18.1m ²	2.4m
6	Sycamore	40.7m ²	3.6m
G15	Various	38.0m ²	3.5m
G17	Various	63.6m ²	4.5m

APPENDIX 4

Tree Protection Plan

Arboricultural Impacts: Summary		
(For details, see below)		
Impact	No. of Trees	
Trees to be removed	0	
Groups of trees to be removed	0	
Groups of trees to be partially removed	1	
Trees to be pruned	5	
Trees where manual excavation needed within RPAs	5	
Trees where above soil surfacing needed within RPAs	0	
Trees with proposed underground services within RPAs	0	
Groups of Trees to be Partially Removed		
No	Species	Category
G15	Various	C
Trees to be pruned		
No.	Species	Works (Outline only)
1	Sycamore	Reduce N crown extent by up to 2m
2	Sycamore	Reduce N crown extent by up to 1m
3	Sycamore	Reduce N crown extent by up to 2.5m
4	Sycamore	Reduce N crown extent by up to 3.5m
5	Ash	Reduce NE crown extent by up to 2m
Pruning is to be undertaken in accordance with the British Standard Recommendations for Tree work, BS3998: 2010. Climbing irons or spikes are not to be used whilst pruning trees.		
Trees that require manual excavation within RPAs		
No.	Species	Type of structure
1	Sycamore	Proposed car parking bays and wall
2	Sycamore	Proposed car parking bays and wall
3	Sycamore	Proposed car parking bays, kerb and wall
4	Sycamore	Proposed car parking bays, kerb and wall
5	Ash	Proposed car parking bays, kerb and wall



Site Hoarding

To be erected prior to the commencement of works on site, and retained in place throughout construction. To comprise timber / metal hoarding, of at least 2.4m in height. Supporting posts to be fit for purpose and installed carefully so as to minimise damage to significant existing tree roots. "TREE PROTECTION ZONE - KEEP OUT" or similar notices to be attached at appropriate intervals.



TREE PROTECTIVE Site hoarding

Manual Excavation

Within root protection areas the first 750mm depth of any excavation, whether for proposed foundations, hard surfacing, or underground services shall be undertaken by hand under arboricultural supervision. The soil will be loosened with a pick or fork, and then will be cleared from roots with a compressed air soil pick. All roots will be cut cleanly with a hand saw or secateurs. The edge of the excavation closest to the trees will be covered with hessian sacking to prevent drying out, and if necessary be shuttered with an appropriate material to prevent soil collapse. Where appropriate, the soil beneath this depth may be sheet piled; and deeper excavation may be undertaken by a machine provided it works from outside the root protection areas.

Arboricultural Supervision

The arboricultural consultant will directly supervise all construction works that have to be undertaken within root protection areas. These include:

1. Location of protective site hoarding.
2. All excavations, whether for proposed foundations, hard surfacing, or underground services.

SJA ARBORICULTURAL PLANNING CONSULTANTS

Project: Land to the Northwest of Factory Road, Northfleet

Client: 

Drawing: TREE PROTECTION PLAN

Drawing no: SJA TPP 25265-041a

Based on: 13281-LUC-TW-XX-DR-L-1001 rev P04

Drawn by: APH	Date of Issue: June 2025	Scale: 1: 200 @ A3
Checked by: SJ	Tel:(01737) 813058	sja@sjatrees.co.uk

Tree nos.: ● 5	Canopies of trees to be retained: 	Trees to be removed: 
Category 'C' RPA: 	Manual excavation: 	Indicative pruning line: 

For further information refer to the SJATrees Tree Survey Schedule

Do not scale from this drawing; please check all dimensions on site, and notify us of any discrepancies. SJATrees (the trading name of Simon Jones Associates Ltd.) cannot be held responsible for inaccuracies in the topographical plan on which this drawing is based. © Simon Jones Associates Ltd. 2025

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This drawing is designed to reflect only the principles of layout and for design insofar as these relate to the protection of trees to be retained, and should NOT be read as a definitive engineering or construction method statement. Reference should be made to the architect or structural engineer, as appropriate, over any matters of construction detail or specification, or any engineering standards or regulatory requirements relating to proposed structures, hard surfacing or underground services.