Howard Smith
Principal Project Manager (Development)
Exeter City Council
Paris Street
Exeter
EX1 1JN

9th December 2020.

Dear Howard,

Re: Planning Application 20/0691/FUL (Clifton Hill)

I understand revised information has been submitted in support of this application.

At the time of writing, the applicant has yet to respond to the majority of design and mitigation issues as previously highlighted. This has included the protection of retained trees and adequate mitigation for the loss of existing trees removed to allow development.

Concerns raised by Exeter City Councils, (ECC) Arboriculture Officer also do not appear to have been to be fully addressed within the revised proposals.

The following information is understood to be supporting the Planning Application, but does not appear to have been published on the ECC website for public or external review;

- Arboricultural Method Statement for Clifton Hill from Major Trees dated 03-08-20
- Clifton Hill Tree Protection Plan from Simon Major Trees dated 03-08-20
- Tree 1 – Car Park – Cellweb and Silva Cells from Simon Major Trees dated 03-08-20

Why has this information not been published?

On the Arboricultural Impact Assessment (AIA) drawing from Major Trees dated 19-07-20 reference is made to the use of '*Silva Cells*' or '*Structural soil*' (depth not specified) as compensatory rooting volume as mitigation for the loss of existing tree roots that will arise through excavations into the Root Protection Area (RPA) of retained tree T1.

I have not seen precedent for the use of either system in the UK and question the viability of the proposals. The Deep Root website (supplier of Silva Cells) referenced in the Arboricultural Method Statement (AMS) report makes no reference to use of the product in this context.

An existing electricity cable is suggested as being located in proximity to the proposed Silva Cell installation area. Have Western Power Distribution agreed to the installation of this product over/around the cable? Has viability of installation been proven?

The loss of root derived from construction impacts from off-site retained trees T9-T13* cannot be estimated without details of the adjacent retaining structure(s) which have not been provided at this time.

Reference is made to 1.5m offset from T13* from the proposed building. This maybe insufficient for scaffold and MEWP access during construction.

Maintenance of retained tree canopies T7 and T9 to T13* will be required in proximity to new buildings for the remaining/reduced life expectancies of these trees. Given the trees are in ECC ownership, will maintenance be at public expense? If so, what are the estimated costs of this?

* 2No. trees are labelled as T13 on the AIA drawing, (which is confusing and assumed to be a drafting error)

Tree Protection Plan (TPP) drawing from Simon Major Trees dated 03-08-20 includes provisions for Construction Exclusion Zones (CEZs) and tree protection fencing to protect retained trees during the construction phase.

The location of the CEZ will preclude construction of the southeast elevation of Plots 18 and 19 and associated stepped access. – Further assessment required to demonstrate plot construction and/or tree retention viability.

I object to the proposed development in its current form and my previous technical comments in relation still stand.

Yours sincerely,

Tim Arkell
(Tree Warden)