

## **Arboricultural Report**

## Objection to Maidstone Borough Council Tree Preservation Order 5008/2021/TPO

Relating to one individual Lime tree & a group of eleven Lime trees located at

## Becketts Croft Malling Road Teston Kent ME18 5AR

Clients Mr & Mrs Hopson

by Curtis Barkel RCArborA, DipArb (RFS), F.Arbor.A

Ref: SA/1851/21





Arboricultural Consultant: Curtis Barkel - RCArborA, DipArb(RFS), FArborA Fellow and Registered Consultant of the Arboricultural Association



Sylvanarb Ltd, trading as Sylvanarb. Registered in England and Wales. Company No: 11762540. Registered Office: 139 Bush Road, Cuxton, Kent. ME2 1EZ.

### **Executive Summary**

#### This report is submitted in OBJECTION to the Maidstone BC Tree Preservation Order, Ref: 5008/2021/TPO

#### **GROUNDS OF OBJECTION IN BRIEF:**

1. The management objectives can be achieved in accordance with best practice with only minor revisions to the proposed tree work specification.

2. It is not considered to be expedient under the terms of the Planning Practice Guidance to serve a TPO on trees that are intended to be managed in accordance with best practice.

3. The trees will outgrow the setting and will increasingly impact negatively on the residential setting leading to future calls for removal which, if successful, would result in the loss of trees that could otherwise be managed responsibly as traditional pollards.

4. The proposed re-pollarding of the trees is a traditional form of management that will not be detrimental to the character of the Conservation Area.

#### SUMMARY:

A S211 Notice was submitted to Maidstone Borough Council (MBC) on 26 January 2021, this providing the Local Authority with six weeks notice of intended tree work within a Conservation Area.

The Notice was submitted by Down to Earth Trees, an Arboricultural Association Approved Contractor, who had advised the tree owners on the management of their trees and who provided the submitted treework specification.

In response to the S211 Notice, MBC served a Tree Preservation Order (TPO) on twelve trees, this being served in order to prevent the proposed works from being carried out.

The TPO was served five months after the submission of the original S.211 Notice, which only required that six weeks notice of intent be given. This provided sufficient time for the Local Authority to discuss why the works were deemed to be unacceptable and possibly agree an alternative specification with the tree owner without the need for a TPO being served.

The tree owners (Mr & Mrs Hopson) therefore submit this report in objection to the confirmation of the Maidstone BC (TPO) Ref: 5008/2021/TPO.

Their objection is based on the findings set out within this report which show that it would not be expedient for the Local Authority to confirm a TPO on trees that the owner sought to responsibly manage in accordance with best practice and under the guidance of an Arboricultural Association Approved Contractor.

To confirm such an Order would not therefore be within the statutory powers granted to the Local Authority under the Town & Country Planning (Tree Preservation)(England) Regulations 2012 (from hereon referred to as 'the Regulations'), as clarified at Para 010 of the current Planning Practice Guidance (March 2014) '...it

is unlikely to be necessary to make an Order in respect of trees which are under good arboricultural or silvicultural management'.

Whether or not the Local Authority considered the work to be 'good arboricultural management', it is evident that the tree owners had sought professional advice and were under the impression that the work proposed was reasonable and in accordance with best practice. As such, their intention as responsible tree owners should have been recognised by the Local Authority and dialogue entered into. This would have provided an opportunity to agree alternative works and avoid the imposition of a TPO on trees that are already protected by their Conservation Area status.

On behalf of Mr & Mrs Hopson, I therefore propose to the council that the provisional TPO be revoked (or be allowed to expire) and the subject trees revert back to their Conservation Area status; alternative management proposals are presented within this report that, if agreeable to the Local Authority, can be submitted to the Council under a formal S.211 Notice. This resulting in the trees being responsibly managed under the continued protection of the Conservation Area.

## Contents

Page	Section	
4		Contents
5	1.0	Introduction
7	2.0	Case Background
8	3.0	MBC Reasons for Serving TPO
9	4.0	Appraisal
13	5.0	Conclusion
14	6.0	Recommended revised Tree Work Specification

Appendix A

Tree Survey Data & Plan

Site	Becketts Croft, Malling Road, Teston, Kent. ME18 5AR.	
Survey Date	22 July 2021	
Report Date	05 August 2021	
Surveyed by	Curtis Barkel	

#### 1. INTRODUCTION

#### 1.1 Qualifications and Experience

- 1.1.1 My name is Curtis Barkel, I am the founder and principal consultant for Sylvanarb Arboricultural Consultants, an independent practice that has been providing primarily planning related arboricultural advice for the past fourteen years. I am a Fellow and Registered Consultant of the Arboricultural Association and hold the Royal Forestry Society Professional Diploma in Arboriculture, this being recognised as the highest professional qualification in arboriculture; as well as the Arboricultural Association Technicians Certificate and a Higher National Diploma in Forestry.
- 1.1.2 I have almost thirty years experience in the arboricultural and forestry industries. Previously employed as a Tree Officer for over nine years, at the London Borough of Bromley and at Medway Council, where I was responsible for the management of the Local Authority tree stock and advising on arboricultural and woodland matters relating to the planning system. Prior to this I worked as a tree surgeon, after commencing my career in the forestry industry.
- 1.1.3 Sylvanarb has a broad range of clients and provides arboricultural consultancy services to both the public and private sectors; the vast majority of my work involves trees in the planning process, specifically matters relating to Tree Preservation Order legislation and the application of the British Standard BS5837:2012 'Trees in Relation to Design, Demolition and Construction'.
- 1.1.4 I am on the Board of Trustees for a local woodland conservation trust (West Kent Downs Countryside Trust), and I have a keen interest in the management of trees and woodland for conservation and amenity purposes.

#### 1.2 Instructions

- 1.2.1 Sylvanarb has received instructions from Mr & Mrs Hopson to carry out an assessment of twelve trees on their property, Becketts Croft, Malling Road, Teston.
- 1.2.2 The subject trees were recently protected by Maidstone Borough Council (MBC) under a provisional Tree Preservation Order (TPO), Ref: 5008/2021/TPO. The property is also located within a Conservation Area, providing a similar level of protection for the trees.
- 1.2.3 The purpose of this assessment is:

a) To look into the reasons why the TPO was served and whether confirmation of the Order is necessary, in terms of the protection of the trees, and justifiable in terms of current government guidance.

b) To consider and provide recommendations for the sustainable long-term management of the subject trees.

1.2.4 Where any relevant points are identified under 1.2.3 a), the tree owners have requested that these be presented on their behalf as a formal objection to the confirmation of the TPO.

#### 2. CASE BACKGROUND

- 2.1 A S.211 Notice was submitted to Maidstone Borough Council (MBC) on 26 January 2021, this providing the Local Authority with six weeks notice of a variety of intended tree work within a Conservation Area.
- 2.2 The Notice was submitted on behalf of Mr & Mrs Hopson by Down to Earth Trees, an Arboricultural Association Approved Contractor, who had advised the tree owners on the management of their trees and who provided the submitted tree work specification.
- 2.3 Upon the expiry of the six week period of notice, having not received notification of a Tree Preservation Order (TPO) being served, the tree owners were entitled to proceed with the proposed work.
- 2.4 Mr & Mrs Hopson requested that Down to Earth Trees schedule the proposed tree work in to their work programme and, as they were sure the proposals were both necessary and required to ensure the responsible management of their trees, did not expect any further involvement of the Local Authority.
- 2.5 Over ten weeks later (approximately sixteen weeks after the date of the S.211 Notice), notification from MBC was received stating that an objection had been raised to the re-pollarding of their twelve Lime trees, as proposed under the (expired) S.211 Notice.
- 2.6 Approximately four weeks later, notification of a TPO having been served on the twelve Lime trees was received, this being approximately twenty weeks (five months) after the submission of the initial six week S.211 notice.

#### 3. MBC REASONS FOR SERVING TPO 5008/2021/TPO

- 3.1 In the officer's report, dated 20 May 2021, the MBC Tree Officer explains the reason for serving the TPO in order to prevent the re-pollarding of the twelve Lime trees as proposed by Down to Earth Trees.
- 3.2 One reason is given, this being based on the potential for the proposed works to not comply with the guidance of *BS3998:2010 Tree Work: Recommendations* (BS3998), in that the intended work would result in large diameter wounds that presented a risk of physiological dysfunction and decay.
- 3.3 No other reasons to object to the proposed works are given.
- 3.4 The officer confirms that the trees are prominent in terms of visual amenity, appear to be in good health and offer a life expectancy of more than forty years. Having considered these points, and having carried out a TEMPO evaluation for suitability for protection, the officer recommends that a TPO be served.
- 3.5 No opportunity was provided for discussing the opposing views of Down to Earth Trees and the MBC officer in order to agree lesser or alternative management, even though the passage of time between the S.211 Notice and the serving of the TPO (four months), would have made it apparent that there was no immediate threat of the work being carried out and the tree owners clearly had the best interests of the trees in mind.

#### 4. APPRAISAL

#### 4.1 The Tree Work Proposed

- 4.1.1 The group G1 is comprised of eleven subject trees of varying heights and stem diameters, these are considered to be semi-mature to early-mature trees with estimated heights ranging from 15m to 19m and stem diameters ranging from 310mm to 720mm.
- 4.1.2 The individual tree T1 is considered to be a mature tree and is estimated as being 15m tall with an assumed stem diameter of approximately 1000mm (access to measure the stem was inhibited by basal and stem growth).
- 4.1.3 The pruning specification submitted by Down to Earth Trees for G1 was to '*Reduce by 14m to old pollard points at 7m*'; the pruning specification for T1 was to '*Reduce to height of previous pollard points (8m finished height) removing 12m of growth....)*.
- 4.1.4 Although the intention of the specification is clear i.e. to re-pollard to 7m and 8m respectively, both pruning specifications suggest that the trees are much taller than they actually are and as a result the proposed reductions are presented as being far greater than they would actually need to be.
- 4.1.5 A request for clarification of this point from the Council would have possibly allowed discussions to begin between the tree surgeon, the applicants and the tree officer in order to potentially arrive at an alternative mutually acceptable specification. Indeed, Para 127 of the Planning Practice Guidance states that where an ambiguous notice is received '*The authority may wish to provide information to help* [the applicant] *resubmit an appropriate notice*'.

#### 4.2 Standard of the Proposed Tree Work in Terms of Best Practice (BS3998)

- 4.2.1 The tree officer considers that the proposed works do not follow best practice guidance provided in BS3998, raising concerns that the resulting pruning wounds would present a risk of physiological dysfunction and decay.
- 4.2.2 However the tree officer only directly refers to (and quotes) Clause 7.10 of BS3998 when considering the proposal, this clause providing advice on re-instating pollard management for lapsed pollards based on the following fundamental principle, if *'the pollard cycle has been allowed to lapse over many years, the crown should instead be reduced to the minimum necessary to fulfil current objectives'.*
- 4.2.3 If the *'current objective'* is in fact to re-instate a pollard management regime for a lapsed pollard, as was the intention of the S.211 Notice, the *'minimum necessary'* reduction of the canopy would be to a point at which the objective of pollarding is achieved, without removing all branches back to the original pollard point.

- 4.2.4 This is covered under Clause 7.10, which goes on to describe how a lapsed pollard could be repollarded 'by cutting just above a suitable lateral branch, or failing that, by retaining a live stub from which new shoots could grow'; and that only the removal of all 'attached foliage would probably lead to physiological dysfunction and decay'.
- 4.2.5 The Standard also goes on to provide the following additional advice, which is particularly relevant to the re-instatement of pollard management and has not been referred to in the case officer report:

#### Clause 5.4 Phased Work

• 'If it is determined that undertaking tree work in a single operation would lead to significant adverse impact...the work should be phased where practicable, eg.....phasing the management of an individual tree over a number of years'.

Annex C.2 - Retrenchment Pruning of Veteran Trees & Lapsed Pollards

- 'Retrenchment pruning is a phased form of crown reduction'
- 'Retrenchment pruning should be chosen as the main option for managing lapsed pollards that would otherwise tend to break up and that, because of inadequate lower crown, might not have enough leaf area to survive if reduced to the ultimately intended height and spread in a single operation'.

#### 4.3 **Reasons for the Proposed Tree Work**

- 4.3.1 Considering the spacing of the trees in group G1; the use of the species in traditional planting schemes; their setting; and their past management, it is clear that the trees would have originally been planted to be maintained as a feature group of Lime pollards lining the property boundary; this being a very common management regime for Lime trees in our villages, towns and cities.
- 4.3.2 Using the method for the calculation of tree age provided in the Forestry Research Information Note No.12, the average age of the trees forming G1, using an average stem diameter of 600mm, is 61 years. This would tie in with the Google Earth photographs that appear to show a line of small trees along the property boundary in the 1960 aerial image.
- 4.3.3 Lime trees have the potential to live for 300+ years, with the subject trees having been pollarded in the past, they are no doubt smaller now than if they had been left unpollarded; considering this I estimate that these trees have the potential to grow at least another 10m in height and a further 5m in spread.
- 4.3.4 These trees are currently only semi-mature, or early-mature at best, with the potential to significantly increase in both height and spread. As such, the suitability of eleven fully grown Lime trees within this residential setting, five of which are immediately adjacent to and within seven metres of the dwelling, requires careful consideration.

- 4.3.5 The tree owners contacted three tree surgery companies for advice on the responsible management of the trees, to ensure they were suitably maintained so as not to present a risk to the adjacent highway and their property. All three companies advised that the trees had been pollarded in the past and suggested the re-instatement of a pollard regime as an acceptable option for their management.
- 4.3.6 Mr & Mrs Hopson decided to proceed with Down to Earth Trees, as they are an Arboricultural Association Approved Contractor, this being one of only two recognised schemes certifying the competence of arborists in the UK. The Arboricultural Association state on their website that the approved contractor programme is 'A Mark of Quality Assuring customers of good quality tree care undertaken safely and efficiently'.
- 4.3.7 Furthermore, the member of staff that visited Mr & Mrs Hopson and produced the tree work specification was previously a lecturer in arboriculture at Merrist Wood College and the Vice Chair of the Arboricultural Association's Education and Training Committee.
- 4.3.8 Down to Earth Trees were appointed to carry out the proposed work and supported the proposal by acting as agent for the tree owners in their submission of a S.211 Notice to MBC.
- 4.3.9 As a result, Mr & Mrs Hopson considered that the intended tree work was entirely appropriate and responsible tree management that would be carried out by a leading industry approved contractor in accordance with best practice, as stated on their website '*Down To Earth Trees operates to the latest industry guidelines and the best arboricultural practices at all times*'.

#### 4.4 **Expediency of Protection by TPO**

- 4.4.1 'It is unlikely to be necessary to make an Order in respect of trees which are under good arboricultural or silvicultural management'. Planning Practice Guidance, Para 010.
- 4.4.2 Considering the relevant parts of the British Standard for tree work at 4.2 above and the reasoning behind the proposal for carrying out the work at 4.3, it is clear that the sole intention of the tree owner's was to responsibly manage the subject trees and they were under the impression that they had followed all correct procedures and taken professional advice in order to ensure the trees were under good arboricultural management.
- 4.4.3 A Local Authority tree officer may of course have a different opinion on the application of best practice guidance for tree work. However, in such instances, when it is clear that the tree owner is intending to carry out responsible management, the submission of a S.211 Notice provides sufficient time for both parties to potentially agree an alternative or revised specification. In which case.... 'Even if the tree's amenity value may merit an Order the authority can still decide that it would not be expedient to make one', as advised at Para 119 of current Planning Practice Guidance.

- 4.4.4 In this case, a further three and half months passed by between the expiry of the S.211 Notice to the serving of the TPO, this providing even more time for any such discussions between the Local Authority and a 'responsible' tree owner, to explain why the works may not be appropriate and to agree an alternative specification.
- 4.4.5 When considering proposed tree work within a Conservation Area the Local Authority is required to 'pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area'. Planning Practice Guidance, Para 119.
- 4.4.6 Assuming the proposed works could be achieved in accordance with best practice, perhaps after agreeing with the Local Authority a phased approach to the work or higher pollarding points (as advised in BS3998), the proposal would both preserve and enhance the character of the Conservation Area; with pollarded trees lining the boundaries of Georgian and Victorian properties being a characteristic feature in Conservation Areas throughout the country.
- 4.4.7 Becketts Croft is a Grade II listed Georgian property and the re-instatement of a line of pollarded Lime trees along the property frontage would be culturally appropriate to the period setting, as well as providing sustainable and responsible long-term management for trees in such a setting.
- 4.4.8 Although the straightforward serving of a TPO in response to tree work proposals deemed to be unacceptable within a Conservation Area is perfectly acceptable within the terms of the legislation; the associated guidance is more nuanced in instructing a Local Authority to recognise the 'expediency' of serving a TPO i.e. the actual need for a TPO under the particular circumstances of the case.

#### 5. CONCLUSION

- 5.1 The S.211 Notice for the proposed re-pollarding of the subject trees was specified and submitted to the Local Authority by an approved contractor who states that their work is carried out in accordance with nationally recognised best practice.
- 5.2 Mr & Mrs Hopson had sought best practice management advice from the contractor and had fully intended to manage their trees as a responsible tree owner.
- 5.3 The Council's objection to the proposed works is based on the point that the resulting wounds may lead to dysfunction and decay.
- 5.4 The current British Standard for tree work provides advice on how to reinstate pollard management for trees that have previously been pollarded and subsequently become 'lapsed pollards'.
- 5.5 Having considered the past pruning history; the species; the age of the trees; the size of pollard stems; the future growth potential; and the current setting, I consider that a programme of phased reduction to ultimately bring the trees back under a cyclical pollarding regime would be achievable without detriment to the long-term health of the trees. I believe that this would be something that would be agreeable to both the advising tree surgeon and the Local Authority Tree Officer.
- 5.6 As such, I believe an opportunity has been missed for the Local Authority to enter into discussions with the tree owners and their agent (Down to Earth Trees), to agree a revised pruning specification that would have achieved the intended objective of suitably maintaining the trees within the setting without detriment to tree health or wider visual amenity.
- 5.7 One final opportunity is now presented for these discussions to be had before the final decision is made on whether to confirm the TPO. This would follow the guidance set out in the decision found in *Stirk v Bridgnorth District Council* (1997) 73 P&CR 439, which states that since the Local Authority is responsible both for making and confirming TPOs, *'the obligation to deal thoroughly, conscientiously and fairly with any objection [is] enhanced'*.
- 5.8 Para 3.37 of Tree Preservation Orders: A Guide to the Law and Good Practice, expands further on this point advising that, 'Discussion between the LPA and any person who makes an objection is encouraged. Discussion can lead to a greater mutual understanding of each side's point of view. This in turn can help clarify the main issues which will have to be considered by the LPA before they decide whether to confirm the TPO'.
- 5.9 A revised pruning specification is provided at Section 6.0 below, this following the guidance of *BS3998:2010 Tree Work: Recommendations* and achieving the tree owners objective for the management of the subject trees, whilst maintaining and enhancing the visual amenity they provide.
- 5.10 This report is to be submitted in objection to the TPO with the intention that the revised tree work specification can be agreed with the Local Authority and the TPO then revoked (or allowed to expire), leaving the trees to continue to be protected under their Conservation Area status.

#### 6. RECOMMENDED REVISED TREE WORK SPECIFICATION

#### 6.1 **Group G1**

- 6.1.1 It is agreed that the reinstatement of pollard management by reducing these trees to the height of the *'old pollard points at 7m'* in one single operation, as proposed by Down to Earth Trees, presents a risk of physiological stress that may be detrimental to the long term health of the trees.
- 6.1.2 As recommended at Annex C.2 of BS3998, it is therefore recommended that a phased form of crown reduction be initiated to ultimately achieve the desired objective of managing the trees under a periodic pollarding regime.
- 6.1.3 This can be achieved through a programme of initial reduction works to form secondary pollard points, as is frequently seen on trees throughout towns and cities across the country and sometimes referred to as 'French pollarding'. Where possible, this allows for a branch structure to be retained for the pollard regrowth to develop from, as opposed to removing all growth back to the main stem (as originally proposed).
- 6.1.4 These trees range in height from approximately 15-19m. I consider that an initial reduction to secondary pollard points at 12m would be physiologically acceptable for trees of this species and age. The resulting work would leave the trees with a stem and branch structure that would provide a striking feature within the setting, from which the resulting regrowth would quickly develop.
- 6.1.5 Following a period of regrowth development, the trees could then be reappraised by the owners and the Local Authority to consider whether a second stage of height reduction would be appropriate to form new pollard points at a lower level, or whether re-pollarding to the same points would be preferable.
- 6.1.6 The suggested works would allow the trees to be maintained as prominent feature specimens along the property frontage as they were originally intended to be; whilst addressing the concern over their potential to significantly increase in size and outgrow this residential setting.

#### 6.2 *Tree T1*

- 6.2.1 This tree would appear to be much older than the members of the group G1 and has apparently undergone pollard management more recently than the group.
- 6.2.2 The majority of the existing regrowth that has developed from the two pollarded main stems is estimated to be between 100-150mm diameter.
- 6.2.3 The tree is located adjacent to the boundary of a small neighbouring garden and it is my opinion that the continuation of the periodic pollarding that has historically been carried out is required to reduce the risk of pollard regrowth failure and to avoid the tree outgrowing the setting.

- 6.2.4 Considering the size of the majority of the existing pollard regrowth, I consider that repollarding the tree back to the original pollard points would currently be acceptable in terms of physiological stress and the potential for decay.
- 6.2.5 As such, I recommend that this tree be re-pollarded back to the original pollard points, with all stem and basal growth removed.

#### 6.3 *Required Permission*

- 6.3.1 Assuming the Local Authority agree in principle to the above tree management proposals, it would be expected that the TPO would not be confirmed and would either be revoked or allowed to expire.
- 6.3.2 The specification at Table 1 below can then be submitted in the form of a new Section 211 Notice as required under the Conservation Area, this being a six week notification period.
- 6.3.3 Should the Local Authority decide to confirm the TPO, the specification will need to be submitted as an application for works to protected trees, this being an eight week application process.

Tree No.	Species	Recommended Works	Reasons for Works
T1	Lime (TPO)	<ul> <li>Repollard to previous pollard points leaving 200-300mm stubs.</li> <li>Remove all stem epicormic growth from ground level to pollard points.</li> <li>Remove all basal growth.</li> </ul>	<ul> <li>To initiate a phased programme of pollard management in accordance with BS3998.</li> </ul>
G1	Lime x 11 (TPO)	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> <li>Note: Where any suitable side branches are present at or below 12m, these are to be shortened to form secondary pollard points in order to promote the establishment of a pollard framework.</li> </ul>	<ul> <li>To initiate a phased programme of pollard management in accordance with BS3998.</li> </ul>
T'a'	Lime	- Fell and grind stump.	<ul> <li>A suppressed self-sown young tree with limited potential.</li> <li>Excluded from the TPO but protected under the CA status</li> </ul>

Table 1: Recommended Management Works

# **Appendix A**

## Tree Survey Data & Plan

## Tree Survey Data Becketts Croft, Malling Road, Teston.

-						
TREE NO	SPECIES	HEIGHT (m)	DIAMETER AT 1.5m or arf (mm)	AGE CLASS	NOTES	PRELIMINARY MGT RECOMMENDATIONS
T1	Lime	15	1000e	Mature	<ul> <li>Extensive basal/stem growth hindering assessment.</li> <li>Bifurcated at 2m.</li> <li>Pollarded at 7m.</li> <li>Multiple pollard regrowth primarily 100-150mm diameter with one of approx 300mm from each of the two pollard points.</li> </ul>	<ul> <li>Repollard to previous pollard points leaving 200-300mm stubs at pollard point.</li> <li>Remove all stem epicormic from ground level to pollard points.</li> <li>Remove all basal growth.</li> </ul>
T2	Lime	17	710	Semi Mature	<ul> <li>Bifurcated at 2.5m</li> <li>pollarded sub-stem at 5m to S.</li> <li>Historic pollard at 6.5m.</li> <li>Potentially damaging wall.</li> </ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
Т3	Lime	17	580	Semi Mature	<ul> <li>Swept stem to E.</li> <li>Bifurcated at 2.5m</li> <li>Historic pollard at 6.5m.</li> </ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T4	Lime	17	520	Semi Mature	• Historic pollard at 6.5m.	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T5	Lime	17	510	Semi Mature	• Historic pollard at 6.5m.	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
Т6	Lime	18	610	Semi Mature	<ul><li>Bifurcated at 3.5m.</li><li>Historic pollard at 6.5m.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
Τ7	Lime	18	430	Semi Mature	<ul><li>Historic pollard at 6.5m.</li><li>Side branch at 3m.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>

Becketts Croft, Malling Road, Teston. OBJECTION - to Maidstone BC TPO Ref: 5008/2021/TPO

TREE NO	SPECIES	НЕІСНТ (m)	DIAMETER AT 1.5m or arf (mm)	AGE CLASS	NOTES	PRELIMINARY MGT RECOMMENDATIONS
F		H	DIAMET			
Т8	Lime	17	310	Semi Mature	Historic pollard at 5m?	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
Т9	Lime	15	420	Semi Mature	<ul><li>Historic pollard at 6m.</li><li>Suppressed by T10.</li><li>Poor form.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T10	Lime	19	720	Semi Mature	<ul><li>Stem divides into 3 at 3m with included bark.</li><li>Historic pollard at 6.5m.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T11	Lime	18	500	Semi Mature	<ul><li>Bifurcated at 3.5m.</li><li>Historic pollard at 6.5m.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T12	Lime	16	500e	Semi Mature	<ul><li>Bifurcated at 4m.</li><li>Historic pollard at 6.5m.</li></ul>	<ul> <li>Reduce to form secondary pollard points at a height of 12m from ground level.</li> </ul>
T'a'	Lime	12	270	Young	<ul> <li>Young self-sown tree, suppressed by T2, poor form and growing through canopy of T2.</li> </ul>	- Fell and grind stump.

\*Note: Trees T2-T12 - Where any suitable side branches are present at or below 12m, these are to be shortened to form secondary pollard points in order to promote the establishment of a pollard framework.

APPENDIX 2

#### Becketts Croft, Malling Road, Teston. ME18 5AR



