From: Megan Simpson <Megan.Simpson@marrons-planning.co.uk>
Sent: 16 February 2021 17:02
To: West 2 <west2@planninginspectorate.gov.uk>
Cc: Brian Mullin <Brian.Mullin@marrons-planning.co.uk>; Andrew Collie <ACollie@sitec-is.co.uk>
Subject: APP/Y3805/W/20/3263605 [SHMA-ACTIVE.FID3355566]

Dear Cassandra,

Town and Country Planning Act 1990
Appeal by Cornerstone Limited
Site Address: Grass verge on north side of Upper Shoreham Road (to south of Buckingham Park), Shoreham, BN43 6BE
Appeal Ref: APP/Y3805/W/20/3263605

I write in response to the LPA's Statement of Case, which was sent to us on 4th February 2021.

The LPA's Statement focuses upon two areas, being the impact of the proposed development upon the existing trees and the siting of the proposed monopole in proximity to an existing mast. There is a technical requirement for the proposed mast to be sited in proximity to the existing mast, which we explained in detail in our Statement of Case. We will therefore not repeat this argument here.

However, in response to the LPA's additional comments regarding their concern surrounding the impact of the proposed development upon the existing trees, we would like to reassure the Inspector and the Council that due regard has been given to their protection. The LPA's additional submitted comments make it clear that their concern relates to the potential future pressure to regularly maintain the trees, and the impact this would have upon their public amenity value.

The Arboricultural and Planning Integration Report and Supporting Letter submitted in support of the Appeal certifies that the appeal proposals would *not* require any of the existing trees to be removed or altered to facilitate the development. We would like to highlight to the Inspector that the aforementioned Supporting Letter, prepared by qualified Arborist Glen Harding of Arborcare, states the following:

"The proposed mast would be 17.5m tall and would therefore exceed the height of all nearby trees apart for the pine – T8. The pine has reached maturity and will not become any larger. The remaining trees are all less than 12m in height and none of the crowns would currently interfere with the mast structure. I note there may be some requirement for ongoing pruning, as the trees mature, however I believe this can be readily undertaken without any adverse impact on the health or amenity value of these trees as the pruning would be minor and would not involve the pruning of any primary limbs". (OUR ADDED EMPHASIS)

The Supporting Letter also states that the potential requirement to prune in the future would only be applicable No. 2 individual trees (T1 and T3). If future pruning works were required to these No. 2 individual trees, then this would be undertaken in full accordance with British Standard 3998–2010 (Tree Work - Recommendations) so as to maintain the health of these trees. In addition, as no pruning of any primary limbs would be required, the overall form and appearance of these No. 2 individual trees, and therefore the overall form and appearance of the group of trees in their entirety, would be maintained. The LPA's concern that future pruning would impact upon the *"public amenity value"* of the existing trees is therefore ill-founded.

It is worth noting that the LPA have not provided any of their own arboricultural reports or surveys to underpin their claims.

Should the Inspector be minded to grant the Appeal, the Appellant is happy to accept a condition relating to any tree works.

Kind regards,

Megan Simpson
Planner

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