



Landmark Trees

Our ref: BMF/Ltr/01

Simon Haslem
Basement Force

5th March 2026

Dear Simon,

Re: Camden proposed basement policy D6

I write with regard to the above proposed planning policy that would essentially prevent the construction of basements within gardens. In my opinion, the ban on basements under gardens proposed in the Draft Policy D6 is not justified based on the impact on trees, greenification or the ability to plant trees in the future and for these to grow to full maturity and to live a full and healthy life.

This is because:

- a. The current Policy A5 protects all existing mature trees either by planning condition, Tree Protection Orders (TPOs) or by being within conservation areas. Trees are not allowed to be removed to allow for basement development. Trees and their Root Protection Areas (RPAs) are protected during construction by exclusion areas bounded by temporary fencing.
- b. Policy A5 also requires adequate soil depth on top of any new basement development in a garden area. The soil depth required is one metre on top of the lid of the basement. This one-metre of soil above a basement allows for the planting, growth to full size and full lifespan of all trees grown in the UK. I have covered this previously in a letter I wrote, dated 18 March 2014, and submitted as part of the Regulation 19 Consultation by the Association of Specialist Underpinning Contractors (ASUC). I confirm here that the contents of this letter remain valid.

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I also note that the Camden Basements Topic Paper TP09 dated October 2025 contains flawed points on trees, namely:

- a. Paragraph 6.10 *"...The development of basements often results in tree loss and reduces the scope for the future planting of large-canopy native trees, which are so intrinsic to the Redington Froggnal Conservation Area" (section 4.27.2)."*
- b. Paragraph 6.14 *"...While the Council acknowledges that the size of gardens and basement developments varies, retaining the existing approach in Policy A5 would result in further cumulative losses of mature gardens resulting from the construction process."*

I am unaware of any evidence supporting the above statements and am of the mind that the existing Policy A5 already provides for these matters: unforeseen tree loss can only occur when there is not an appropriate planning condition requiring trees to be protected through construction through the production of Arboricultural Method Statements and Tree Protection Plans. I would also add that areas available for mature gardens are not reduced. The one metre of soil above a basement allows for the full planting of any type of mature garden vegetation and any size or species of tree in the UK.

Further to the above, whilst preparing this letter I have noticed a number of factual mistakes in the contents of the Redington Froggnal Neighbourhood Plan, Adopted Version 2021. Policy UD1 Underground Development in this plan states that:

Point i.a. the viability of gardens spaces.. *"requires maintaining 3 metres of depth for roots of large trees and 2 metres of depth for roots of medium trees. Large and medium trees are defined as:*

- *large trees (ultimate height of 15m+): a minimum of 30 m3*
- *medium trees (ultimate height of 8 -15m): a minimum of 20 m3;"*

and,

Point i. c. *"the viability of trees with ecological or amenity value and potential for future tree planting. This requires maintaining 3-metres of depth for roots of large trees and 2-metres of depth for roots of medium trees;"*

I am unaware of any research / guidance that states trees require either two metres or three metres of soil depth to be viable and consider this to be a wholly unnecessary stipulation. One metre depth is more than adequate. I suspect the error has arisen from a misreading of the research. Tree roots do not occur in significant quantities at substantial depths (e.g. > 2 m) in the soil profile. There are cases where isolated roots have been found at depths much greater than this in deep and loose soils, but typically between 90 and 99 % of a tree's total root length occurs in the upper 1 m of soil. In reality soil depths of much less than one metre are needed for viable tree planting as evidenced in nature. Trees are opportunists and take their resources as they find them. Just because trees can root to extraordinary depths into diamond mines in Africa, it does not mean they 'need to.' They can be just as at home on the extremely shallow soils of the chalk downlands or upland gleys. They do not rely on deep anchorage for support nor the water table for irrigation but intricate connections with the soil and rainfall. I cover this in more detail in my March 2014 letter. The Redington Froggnal Neighbourhood Plan should not have included these stipulations in the first place, and these should now be removed having been identified as unsupported by evidence.

My final point is that by ensuring a landscaping plan is provided under planning conditions, as is the case with the current Policy A5 Basements, the Council can require an increase in tree planting, greenification and mature vegetation. The provision of 1m depth of soil ensures that this planting can achieve its ultimate size, more is simply not needed.

I trust the above provides sufficient information at this time but please do not hesitate to contact us should you require further information.

Yours sincerely



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