Dear Nick,

**Arboricultural Consultation Comments – Oxford Flood Alleviation Scheme.**

Following my site visit in July 2018 to the Oxford Flood Alleviation Scheme and a review of the submitted planning documents, I have produced this letter-based report below detailing my initial response and recommendations considered necessary to ensure legal and planning policy compliance in respect to the trees on-site.

The proposal is to manage the flood risk to Oxford over the next 100 years, it will include lowering parts of the floodplain to create two stages of channels, providing space for flood water flows within a wider channel cross section. It also includes working on some of the existing rivers and streams that run through it, to make more space for water and reduce flood risk to the city. In some areas new flood walls and embankments will be built, and existing temporary defense locations will be utilised as a permanent solution.

**Tree Removals**

The arboricultural reports and plans submitted with the planning application appear to have some inconsistency with regards to tree removals. However, the addendum to the latest report, the Tree Protection Statement, indicates that: “over all the proposed development will require the removal of 304 individual trees and 57 groups of trees. The partial removal of a further 44 tree groups will also be required.”

The current Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) show all of the category U trees as removed. These 163 trees and 6 groups form 22% of the trees on-site. Many of these removals are not required to facilitate the development proposal. This approach is excessive given the nature of the site and the proposal, and these trees should be allowed to naturally decline, managing risk proportionately where necessary. This approach is not in line with the latest guidance or best practice. The Council should not, in providing a decision, accept this level of removal.
In contrast, the Tree Protection Statement (TPS) does appear to reflect the removals detailed above and shows many of these trees as retained. The plan associated with the TPS has no scale, key or breakdown of areas. It is assumed that green indicates retained trees and red removed tree. These removals, as detailed within the TPS, appear to be far more in keeping with the Site and drastically reduce the impact of the proposal. In the same way the previous Tree Removals plans did, the plan should be broken into sections to ensure that it is usable. The associated planning reports (AIA, AMS and TPP) must be amended to reflect the correct number of tree removals.

A number of trees which stand outside the red-line site boundary are shown as being removed on the TPP. This should be clarified and trees outside the applicant's ownership must be retained and sufficiently protected if required.

**Tree Protection**

The AIA states that more detail on the above soil surfacing will be provided within the AMS, however, no further detail is given. The AMS states that the requirements will be decided on-site. This is an approach is not acceptable and will likely result in substandard or no protection being used. This detail needs to be confirmed prior to commencing any work on-site. The installation methodology is insufficient and does not provide the full detail required for a site contractor (including the type of stone required). The required locations and the specification needed should be stated within the AMS and displayed on the TPP. BS5837:2012 states in section 5.5.2 and 5.5.3 that a TPP should show areas requiring ground protection and should include a descriptive text. Section 5.5.5 states that these details should then be reflected within the AMS. The TPP should be updated to show the specific areas that require tree root protection and the required specification.

The AMS states that many aspects of the project relating to trees, including the specification of the above soil surfacing, will be dealt with by the Landscape Clerk of Works (LCoW). Although it states that they will have suitable arboricultural qualifications, it would be more suitable to appoint an Arboricultural Clerk of Works (ACoW) to address all tree related issues on-site. Although a LCoW may be intended to mean an ACoW this should be corrected. Some sections of the report go on to contradict this by stating the “Project Arboriculturist” i.e. section 2.13 of the AMS. Additionally, it is stated that contact details for the LCoW can be found within section 2.17 however no details are provided. It should be made clear who is the point of contact if an incident occurs and how the details of this will be recorded.

The proposed scheme is not very clearly shown within the plans and clear identification of first and second channels would be greatly beneficial, in order to fully understand the impacts. In particular, site access roads should be clearly shown within the plans to ensure that no machinery is entering into the RPA of retained trees.

Tree Protection Fencing throughout the TPP appears to be insufficient. The AMS and TPP should outline how machinery is going to be restricting from accessing the Root Protection Areas (RPA) of retained trees. It is likely, given the scale of the site, that a reduced specification of fencing can be used, such as post and rail fencing or orange mesh fencing, detail of this should be stated within the TPP and AMS.

**Mitigation & other observations**

The Planning Statement and Environmental Statement do not provide significant detail on the replanting and mitigation that will take place once the project has been completed. It is stated that native's trees resilient to climate change will be planted. It may be suitable to include non-native trees or trees from non-native provenances to provide resilience to climate change and improve biosecurity.

If the plans and reports are revised in line with the TPS as discussed in Tree Removals above, then mitigation planting will be required outside of the new blocks currently shown, in order to maintain the
amenity and screening to public areas. This mitigation planting needs to be confirmed, however, without continuity between reports and plans it is not currently possible to assess what will be required.

In section 2.2 of the AIA, the report provides information on protected species. Our Senior Ecologist has reviewed this and highlighted that, although principally much of this is correct, it is now out of date and not exact enough, the cited legislation, particularly the ‘Conservation of Habitats and Species Regulations 2010 (as amended)’ is now out of date (updated to ‘Conservation of Habitats and Species Regulations 2017’ in November 2017) and is not exact enough in respect of offences.

Summary

In order to make an informed decision on the planning application, further detail is needed as outlined above. Principally, the AMS, Tree Removals Plan and TPP need to be updated to the latest version of the proposal, and the required removals and protection measures updated to be proportionate and consistent throughout.

Additionally, in order to aid the decision-making process, it would be greatly beneficial to provide greater context on why specific tree removals are required. Once these details have been clarified, further verification can be carried out and a decision on the planning application can be made.

If you have any further questions, please do not hesitate to contact me.

Kind regards,

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Arboricultural Consultant  
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