Notes on Landmark Trees Arboricultural Impact Assessment Report (AIA) for Waterhouse, Millfield Lane, London, N6 6HT.

Summary page 5, 1.1.4

The Consultant states that tests carried out on Millfield Lane show that it is highly compacted and therefore suitable for heavy vehicles. No ground protection would be required. This is contrary to other assessments; the overall construction of the road is highly variable with patches of compacted aggregate and strips or patches of concrete infill. With multiple heavy vehicle movements this construction will very likely start to break up and compaction damage to underlying tree roots will be inevitable. There are a number of significant trees growing in very close proximity to the road on City of London land including three boundary veteran oaks which will be seriously impacted by the proposed vehicle movements.

The issue of pedestrian safety has not been referred to in the report.

Observations page 11, 3.1.1

The oak tree (T5) which should be referred to as a veteran tree, is probably a survivor of a remnant of woodland that still existed in the 1870's. In previous documents commenting on the earlier planning application this was pointed out and an Ordnance Survey map from the period was included showing the possible tree marked on the map. From the size of the main stem (1300mm) the tree is somewhere between 200 to 250 years old but could possibly be older. Aging trees is a notoriously difficult exercise due to misunderstanding about differences in environmental conditions. An oak tree growing in woodland will grow at roughly half the rate of a tree growing in parkland or woodland pasture. If the tree in question spent its early developmental stage in a woodland environment it is likely to be 250 years or older. The oak tree should be recognised as veteran status but this is not mentioned and this is failing to recognise its heritage and conservation value. See map below.



Figure 1:

Circa 1860's Ordnance Survey map of Millfield Lane showing existing trees superimposed over current aerial photograph (2009) with Waterhouse and oak tree marked with arrows.

<u>3.2.11</u>

T17 the large hornbeam growing to the rear of the existing property is possibly also an old woodland tree. The diameter of the tree's main stem (640mm) suggests a tree of 120-140 years, and hornbeam would probably have made up the woodland species composition that still survived into the late nineteenth century. It is clearly not as old as the veteran oak but merits some recognition as historically important and this warrants further investigation.

Development Constraints

<u>4.1.5</u>

Given that the oak T5 has been recognised in the report as the most significant tree on the site it does not receive the focus and attention that it deserves in the rest of the report. In the section about RPA's there should be some reference to veteran trees and their rooting environments. Trees of this age often have highly localised root systems feeding specific parts of the tree. They seldom comply with the conventional concept of a circular rooting environment. They also are often surprisingly small in area and what viable roots still exist are all the more critical for the tree's long term survival. It would seem more appropriate that the veteran oak has a prescriptive management plan given it's significance.

One of the important differences between the old BS:5837 (2005) and the revised 2012 version was the definition of what the Root Protection Area (RPA) represents. The RPA should be seen as the **minimum** rooting area required for the tree to survive. See below extracts from BS:5837

3.7 root protection area (RPA)

layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority.

5.2.4 Particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development (see **4.5.11**). Where such trees are retained, adequate space should be allowed for their long-term physical retention and future maintenance.

BS:5837 (2012) Trees in relation to design, demolition and construction – Recommendations.

There is also no direct reference to the potential conservation and wildlife benefits that the oak and possibly some of the other trees provide. T5 has a number of cavities and possible microhabitats containing dead wood and associated species. There is no mention of bats, an essential consideration with all older trees with voids and other possible roosting sites; given the close proximity to the Highgate Pond chain and the recorded presence of bats.

Mitigation of Impacts

6.1.10

This quote (Thomas 2000) of trees tolerating 50% root removal is a contentious reference, especially in the context of the point made above concerning RPA's and T5. The point is made again in section 7 7.3 of the report.

References Section

No mention of Helen Read (2000) 'Veteran Trees: A guide to good management'

or

David Lonsdale (2013) 'Ancient and other Veteran Trees: further guidance on management'.

30th April 2015

Mr J Meares Highgate Wood, Conservation and Trees Manager City of London