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Principal Surveyor
Royal Horticultural Society
RHS Garden Wisley
WOKING
Surrey GU23 6QB

17th April 2020

Your ref: **M25 Junction 10/A3 Wisley Interchange**

Our Ref: **Let1-170420-JB**

Dear Mr Alexander

Re: Desktop review of the Highways England tree protection proposals at the M25 Junction 10/A3 Wisley Interchange

Further to our recent correspondence, I write regarding the Highways England (HE) tree protection proposals at the M25 Junction 10/A3 Wisley Interchange. You asked to provide you with a brief preliminary assessment in the form of a desktop study of the proposals set out in the HE documents and to advise on an appropriate way to proceed to minimise any risks to the Wisley trees, and in particular the redwood trees 183 and 184 shown on the provided plans. The two documents I have seen are:

- M25 Junction 10 - A3 Ockham Alignment Options Assessment 27/01/20, Document Ref: HE551522-ATK-HML-A3_J1-RP-CH-000001
- M25 junction 10/A3 Wisley interchange TR010030 9.66 RHS Tree Protection Plan (Response to ExQ 2.8.1)

I stress that I have not visited the site or seen the trees, and so my observations and comments relate solely to the information provided in the above two documents. Consequently, I may need to revise my assessments and advice in the light of any further information and clarifications that I am provided with. I have read those documents and comment as follows.

The two documents that I have seen are technical HE assessments and do not provide enough background explanatory information for me to fully understand some of the descriptions, and the robustness of my advice may be influenced by that limitation. There is no explanation of how the tree data was collected, how the tree assessments were carried out, or any of the background referencing that the analysis was based on. Furthermore, there is no reference to *BS 5837 (2012) Trees in relation to design, demolition and construction – Recommendations*, which is the principal UK technical reference for all matters relating to tree protection and management near construction activities. I have particular concerns about the following omissions:

1. No reference to BS 5837 or any analysis that complies with its recommendations.
2. The lack of a schedule listing all the tree details, including correct botanical species, all tree dimensions (specifically trunk diameter), and the condition of each tree.
3. No reference to who collected the tree data, or their credentials, so qualifications, training, and experience, or any sort of confirmation that they have the expertise to carry out these assessments.



4. No explanation of the phrase '*structural root zone*', a term that is not mentioned or recognised in BS 5837.
5. No calculation of the root protection area (RPA) based on the recommendations set out in BS 5837. Of particular concern is the Section A shown on drawing number HE551522-ATK-GEN-A3_L1_ML-DR-ZM-000001-RevC01, where annotation on the not-to-scale section indicates a structural root zone of 1m depth, and a tree diameter of 1.79m for T184 (see further commentary below).
6. No tree protection measures have been detailed in an arboricultural method statement to show how trees will be protected from harm during development, as required by BS 5837.
7. Appropriate protection measures need to be applied to all the trees identified that could be at risk, and not just the redwoods.

In terms of general commentary, this proposal as described and documented would not comply with the normal planning submission requirements of any UK local planning authority. Although all the above points may have been addressed in the background, there is no evidence within these documents that there has been any sort of professional arboricultural analysis carried out and none of it is even remotely compliant with the standard tree management guidance set out in BS 5837. For example, the idea that there can be a structural root zone of 1m depth as shown on one of the cross-sections has no basis in any research or credible UK technical advice that I am aware of and is a practical nonsense. Tree roots, and especially redwood roots, can extend to many metres in depth, a characteristic that is entirely dependent on species and soil type, so it cannot be reliably regurgitated as a recipe to be applied to all trees. Another example is the indicted T184 diameter of 1.79m in the cross-section. The standard BS 5837 recommendation of RPA radius for a tree of this size would be capped at the maximum of 15m (see Table , which extends way beyond the existing carriageway edge, another nonsense as presented that has not been assessed or explained in the provided documentation.

My conclusion from what I have seen is that this analysis is not credible or fit for purpose as it stands and if the work is carried out on this basis, then there is a real risk of serious and long term harm to your trees. I advise that these concerns are put to HE and it is requested that it carries out a proper BS 5837 survey and analysis of the tree issues and produces that in the standard format that any UK planning authority would require as a normal planning submission. The documentation should comply with the BS 5837 recommendations and specifically show how works within RPAS will be carried out and how the trees will be protected during this activity. This would normally be in the form of an arboricultural impact report and an arboricultural method statement, supported by a tree protection plan detailing all the protective measures. If the proposals are accepted, the works should be supervised by an appropriately qualified arboricultural consultant up until completion.

I have kept this brief and to the point as requested, but I would be happy to provide further clarification on any of these aspects, if that would be helpful. I would also be happy to review any further information and clarifications that HE may wish to provide in response to these comments. I look forward to your further advice.

Yours sincerely

Jeremy Barrell BSc FArborA DipArb CBiol FICFor FRICS