
**APPLICANT NOTE REGARDING ARBORICULTURAL METHOD
STATEMENT**

1. The Applicant prepared a draft Arboricultural Method Statement ("AMS") for discussion with Westminster City Council and provided this directly to Ms Milne of Westminster City Council, as well as Mr Mackworth-Praed on behalf of the City Council and Mr Barrell on behalf of The Thorney Island Society, on 2 September 2020. A copy of the AMS was provided to the Inspector on 15 September 2020 for information and to update him that there were such discussions taking place.
2. Mr Mackworth-Praed issued comments of the AMS as part of a supplementary proof of evidence submitted directly to the Inquiry on 2 October 2020 (CD9.14). As Mr Katkowski QC has previously stated to the Inquiry, it had been the Applicant's intention and understanding that the AMS was to be progressed between the Applicant and the City Council outside the Inquiry process, and therefore the Applicant does not consider that it was appropriate for Mr Mackworth-Praed to have issued such comments as part of the City Council's case and evidence before the Inquiry. The Applicant also notes that it never sought reliance on the draft AMS as part of its case nor made reference to it in the proof of evidence of Dr Hope (CD8.16).
3. The Applicant also notes that Ms Milne of the City Council has stated in separate correspondence to Mr O'Shea that she does not consider that further discussion of the draft AMS is likely to be productive at this stage and that there is a pre-commencement condition requiring the submission of an arboricultural method statement (see draft condition 7, CD5.30 part 2).

11 November 2020