

CDC Arboriculture consultation response.			
CDC Reference	25/01768/HYBRID		
Date Received.		Response date.	21/10/2025
Officer.	Iain Osenton Arboricultural Team Leader.		
Arboricultural information reviewed.	Watermans Arboricultural Impact Assessment June 2025.		

Comment type and Summary.

Objection.

The proposal is considered contrary to NPPF chapter 180c due to the unjustified loss of irreplaceable habitats. The proposal fails to attempt to incorporate trees of high value into the proposal, proposing the removal of 204 out of 323 trees (63%) contrary to CDC policy ESD10.

Observations.

- The AIA categorises trees implicated (table 2) however; the tree removal plan does not demonstrate tree categories of retained vs removed. Table 2 also fails to mention veteran tree status, which must be found in appendix C. The impact assessment does not reference veteran tree status at any point. It is the purpose of an impact assessment to display arboricultural impact in a clear and transparent manner. By omitting veteran tree details from the report, and omitting both veteran and BS5837:2012 categories from the tree removal plan, arboricultural impact cannot be fully considered.
- The proposal highlights the removal of a veteran category A2/3 tree. This is contrary to paragraph 180c of the NPPF, the report does not attempt to justify the removal, explore options to retain the tree, compensate or mitigate in line with NPPF guidance. The loss of irreplaceable habitats such as veteran trees contradicts both paragraph 180c of the NPPF and CDC local policy ESD10.
- The proposal appears to make little attempt to retain high quality arboricultural features considering them as constraints to development. The proposal requires the removal of 53% of category A features, 52% of category B features, 75% of category C features, and 75% of trees protected by a preservation order. It should be noted features includes individual trees, groups and woodlands. The true number of trees proposed for removal therefore will be greater, as groups and woodlands formed of multiple trees are considered as a single feature within the AIA. Due to the challenges of interpreting the AIA as detailed in bullet point 1, it is not possible to highlight each instance of a high-quality tree proposed for removal. However, notable examples include the proposed removal of T662 category A2, T720 category A1 and T67, category B1, all large arboriculturally and visually significant trees. Such trees could be incorporated into the proposal however, this has not been attempted nor discussed within the AIA. CDC policy ESD10 encourages protection of trees with aim to increase tree cover within the district. The proposal is therefore considered contrary to policy ESD10.
- The proposal does not consider arboricultural impact to retained or partially retained features. W866, category A woodland requires partial removal to facilitate residential development. Trees within a woodland will form a cohesive relationship between one another, which can be detrimentally impacted by partial removals leaving retained trees vulnerable to wind load failures. This has not been explored within the AIA. Contrary to BS5837:2012 the AIA does not explore the relationship between retained features and the proposal in order to consider the feasibility of long term retention, items including shading are not considered.

Conformity with NPPF and CDC adopted local plan.

The proposal contradicts NPPF chapter 180c due to the unjustified removal of irreplaceable habitats. The proposal contradicts CDC Policy ESD10, due to a high quantity of tree removals (204 out of 323 trees) including a high percentage of category A, B and protected features.

Further information required.

- The AIA needs to clearly display arboricultural impact upon the tree impact plan/tree removal plan.
- The AIA needs to transparently display veteran/ancient tree/woodland features on tree impact/tree removal plans.
- The AIA needs to discuss irreplaceable habitats in line with NPPF requirements.
- The proposal as a whole needs to explore retention of high-quality arboricultural features incorporating such features into the development.
- The AIA needs to further explore the impact of the proposal in relation to retained features to ensure feasibility.

Conditions.

N/A.

End of document.