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Three Rivers District Council
Planning and Development
Three Rivers House
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29th October 2025

Dear Matthew Roberts,

Reference: 25/1020/OUT

Proposal: Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters). | Land East Of Oxhey Lane Oxhey Lane Carpenders Park Hertfordshire

Thank you for re-consulting the Woodland Trust on the above application.

We have reviewed the applicant's response to our original objection letter from 20th August 2025 and confirm we **maintain our objection** to these proposals. Discussion of various points raised in the response are below.

Clarification on veteran status

The applicant states the trees listed in our original response have been given 'veteran age entries' but this does not mean they have been classified as veteran specimens. It is not clear what is meant by this distinction. If a tree is identified as being in the 'veteran life stage', then it is a veteran tree.

Veteran features are not necessarily a product of tree age or size; they also develop as a result of a tree's life or environment. This is particularly emphasised within the Planning Policy Guidance (PPG) for the 'Natural environment' which is intended to clarify and interpret the NPPF, and states: "*Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. **Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species.***". A key function of the term 'veteran' is to capture trees that have exceptional habitat value as well as those with cultural and heritage value. The term is not a true ecological grouping but serves to help us identify trees which are important for biodiversity in their own right, and as part of a wider assemblage; veteran trees are important for the accumulation of features that are unable to be replicated within our lifetime.

We note the applicant refers to 'Fig 1.3: Chart of Girth in relation to age and developmental classification of tree' from '*Ancient and other veteran trees: further guidance on management*', 2013 as evidence the trees in question do not qualify as veterans. We consider that discrediting a tree's veteran status on the basis of girth is incorrect and goes against government advice and guidance; a tree's designation as veteran should not be contingent on whether it meets a particular girth measurement. Furthermore, the basis for this is ecologically unsound; the size of a tree can be affected by growing conditions, soil quality, nutrient availability, light and competition, life history and management, to name a few factors.

It is also worth noting that this table was created using records on the Ancient Tree Inventory from 2013 and therefore relies on outdated data. We also consider that this table is a poor visual representation of data, partly in that it does not show the distribution of data or a measure of error.

In order to gain clarity on the status of the trees, we ask that the Council's Tree officer is involved in the matter and considers the trees through the lens of the Trust's 'Recognising and Categorising Ancient and Other Veteran Trees' guidance: [Recognising and categorising ancient and other veteran trees](#). This is our most up-to-date guidance and is closely aligned with the definition of veteran trees provided in government policy, legislation, and guidance, specifically the most recent definitions which have been provided in Planning Practice Guidance – Natural Environment, NE and FC standing advice, and Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024.

Finally, we would like to highlight that the applicant acknowledges that these trees are large, mature specimens with significant conservation value, and the potential to become veterans in the future. Even if the trees are assessed and deemed to not yet be veterans, we ask that the Council takes a precautionary approach and still ensures these trees are afforded suitable buffer zones and mitigation measures, so they have the appropriate space to grow and develop. This is in line with paragraph 5.2.4 of BS 5837 guidelines which states: ***"particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development"*** and that ***"adequate space should be allowed for their long-term physical retention and future maintenance"***.

Absence of trees from the Ancient Tree Inventory (ATI)

We note that none of the trees of concern are currently registered on the Ancient Tree Inventory (ATI). The applicant appears to be using this absence as evidence that the trees are not veteran. The Ancient Tree Inventory (ATI) is a citizen science project led by the Woodland Trust and our partners, the Tree Register and The Ancient Tree Forum. It is the UK's most comprehensive database of ancient, veteran and other notable trees, although it is far from complete. It is estimated there could be up to ten times the number of ancient and veteran trees currently registered on the Inventory ([Nolan et al, 2022](#)). The fact that these trees are currently absent from the ATI does not prove anything in relation to their veteran status, it simply reflects the logistical realities of a citizen science project.

Not possible to evidence potential impacts

The applicant states, '*It is an assumption to conclude there will be a significant impact to the trees as there are no means of demonstrating if there would or would not be deterioration of trees*'. In this respect, we would comment that there is well documented evidence in relation to the potential for impacts on veteran trees arising from different types of development, and that potential indirect and direct effects are detailed in Natural England and Forestry

Commission's standing advice. It is the responsibility of an applicant or an applicant's consultants to assess the specific impacts arising from a particular development at a particular location and demonstrate how adverse impacts on irreplaceable habitats such as veteran trees can be avoided or mitigated. The Trust's role is to assess the information available and provide comments based on this assessment. In this case, we do not believe the applicant has provided sufficient evidence to demonstrate that potential impacts to veteran trees can be appropriately mitigated.

Conclusion

Veteran trees are irreplaceable habitats and should be protected from development that will result in loss or deterioration in line with national planning policy. The Trust **maintains its objection** to this application on the basis of deterioration of multiple veteran trees. In its current form, this development does not comply with national planning policy. The applicant must demonstrate that all veteran trees on site will be appropriately protected from detrimental impact and harm in line with paragraph 193(c) of the NPPF.

Please don't hesitate to contact us at planningcasework@woodlandtrust.org.uk if it would be helpful to discuss any of the points raised.

Kind regards,
Frankie Moughton-Small
Woods Under Threat team