

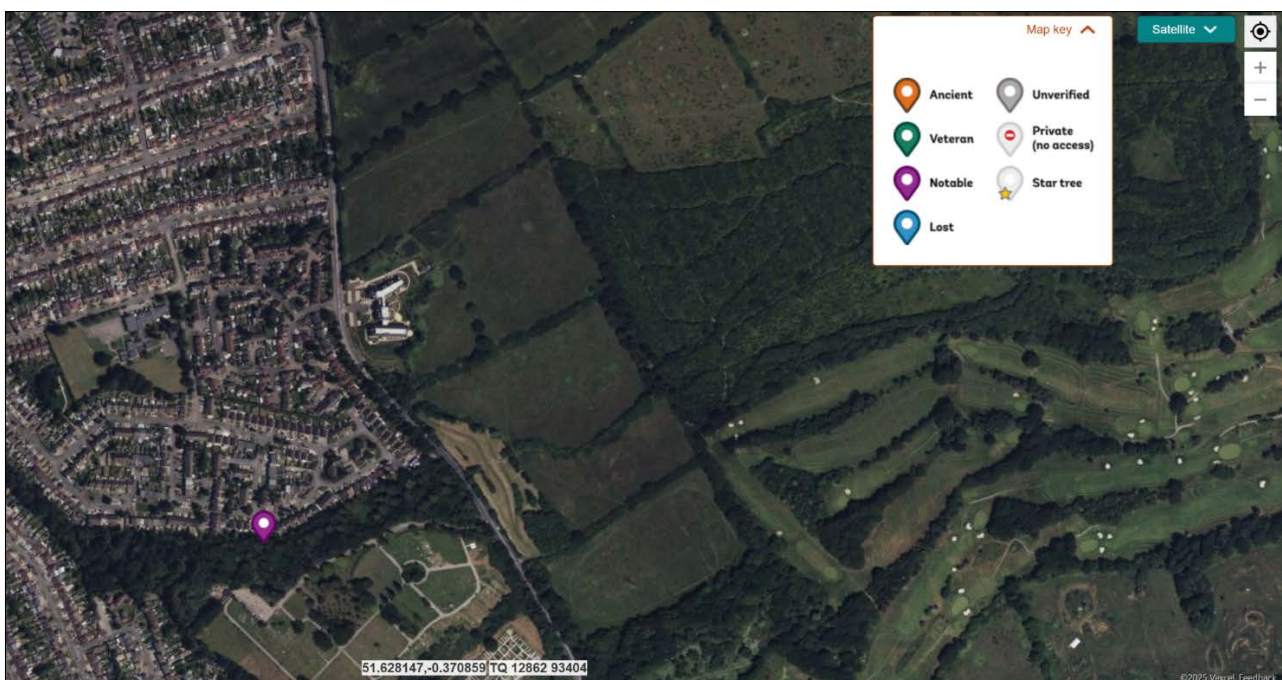
ACD ENVIRONMENTAL RESPONSE TO WOODLAND TRUST COMMENTS

The published information referenced in the Woodland Trust comments are; BS5837:2012, NPPF and Natural England (standing advice only). None are Statutory instruments, furthermore Veteran/Ancient trees are not afforded statutory protection.

The Woodland Trust (WT) comments conclude there will be deterioration of trees caused by construction impact from the design proposals. This objective assessment assumes the Natural England standing advice that Veteran trees should have an RPA calculated x15 trunk diameter (Dbh) or greater. 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.

The survey for the site was carried out to the recommendations as recorded within BS5837:2012. Radii of tree Root Protection Areas are calculated 12x the trunk diameter at 1.5m above ground level (Dbh). RPA areas greater than 707m² in area are capped at 15m radius. The trees were not recorded or given comments for Veteran classification. Veteran age entries and 'A3' subcategory were recorded, the trees being of significant conservation value. They are large trees in prominent positions having limited or no Veteran 'indicators'. It is acknowledged that they have the potential to be assessed as Veterans in the future, however this could be said of any mature tree.

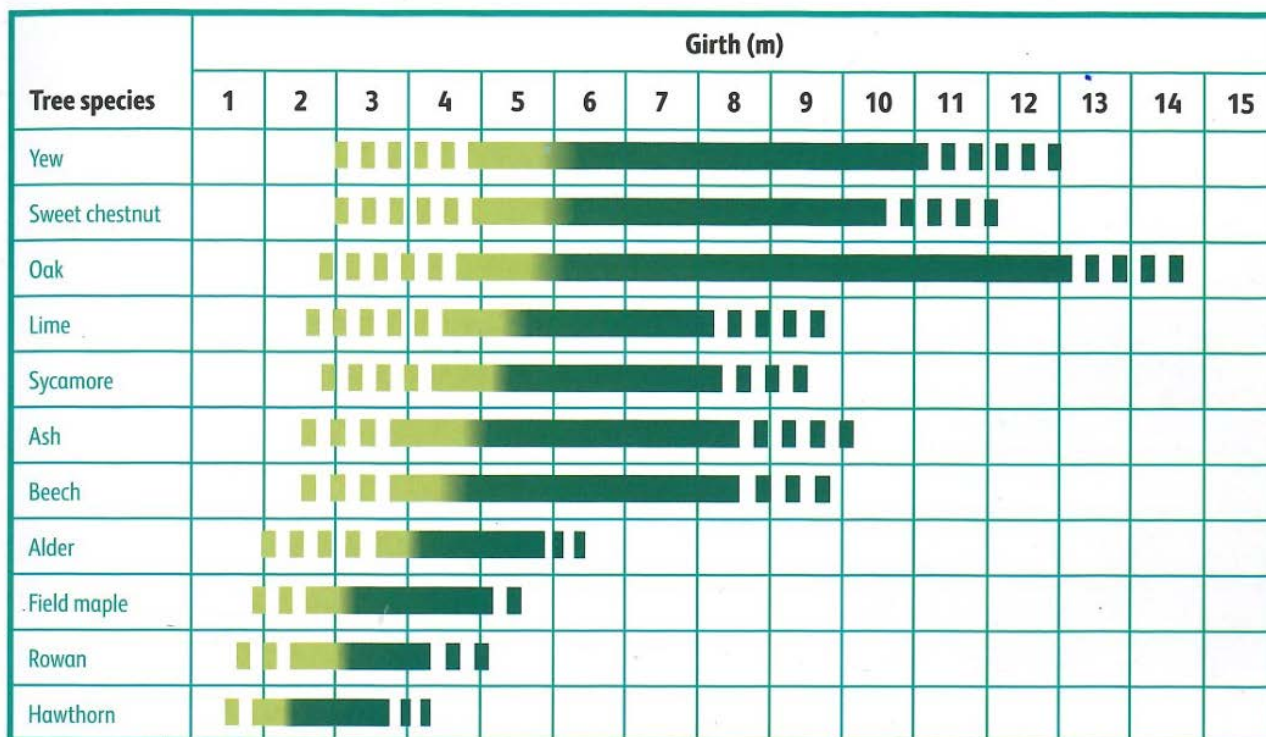
In reviewing the WT Ancient Tree Inventory there are no recorded Veteran/Ancient trees on the site. A screenshot is provided as captured 10/09/25.



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Furthermore, using the standing advice in the WT publication Ancient and Other Veteran Trees: Further Guidance on Management, Section 1.2 Definition of Ancient and Veteran Trees. Figure 1.3 Chart of Girth in relation to age and developmental classification of trees captures classification based on girth. The table is provided below for reference.



KEY: ■ Locally notable ■ Veteran/notable ■ Ancient ■ Late ancient

Fig 1.3: Chart of girth in relation to age and developmental classification of trees*

When calculating the RPAs of BS5837 trees girth is not calculated. The following table details the calculated girth for each listed tree in the WT list of 'trees of concern'.

Tree no.	Dbh (mm) @1.5m	Equivalent Girth (m)
21	1135	3.56
23	1025	3.22
26	1030	3.23
27	1025	3.22
41	1015	3.18
53	1100	3.45
64	1205	3.78
66	1100	3.45
68	1105	3.47

When cross referencing the calculated girth against the WT table all of the trees are bracketed in 'Locally notable'.

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Given the WT are not a Statutory Consultee and the received comments are considered unsolicited advice the following is concluded. The proposed layout has been assessed against the constraints afforded to the trees. It is reasoned that in demonstrating the subject trees are not defined or considered Veterans, with sufficient protection/mitigation identified within the supporting arboricultural package of works, the design proposals are compliant with the recommendations of BS5837:2012. The applicant has considered all trees throughout the design process as outlined in Figure 1 of BS5837:2012 'The design and construction process and tree care'. The submitted proposals retain all trees of high quality and value, providing adequate protection .

ACD Environmental are retained as the project Arboriculturists. All works associated with the proposed layout will be the subject of continued onsite arboricultural input.

Andrew Bigg RFS (Cert. Arb.)

Head of Arboriculture

ACD Environmental

11th September 2025

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