



The Woodland Trust  
Kempton Way  
Grantham  
Lincolnshire  
NG31 6LL

Telephone

Facsimile

Website

[woodlandtrust.org.uk](http://woodlandtrust.org.uk)

National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

17<sup>th</sup> November 2023

Dear Alex Hutson,

**Reference: WW010003 - Cambridge Waste Water Treatment Plant Relocation**

### **Objection – potential impact to veteran trees**

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the development consent application to the Planning Inspectorate.

Natural England's standing advice on veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value.*"

The Trust **objects** to the proposed Waterbeach pipeline route on the basis of potential damage and deterioration of two veteran trees that are identified within the Arboricultural Impact Assessment (APP-104).

### **Planning Policy**

**Paragraph 4.5.13** of the **National Policy Statement for Waste Water** states: "*Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The decision maker should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location, outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.*"

The **National Planning Policy Framework**, paragraph 180, states: "*When determining planning applications, local planning authorities should apply the following principles:*

The Woodland Trust is a charity registered in England and Wales (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee. Registered in England No. 1982873.

The Woodland Trust logo is a registered trademark. FSC® Certified Paper.

*c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>63</sup> and a suitable compensation strategy exists;”*

### **Veteran Trees**

Figure 8.3 (AS-050) outlines the presence of two veteran oak trees within close proximity to the Waterbeach pipeline route, however the accompanying Arboricultural Impact Assessment (APP-104) does not outline any proposed protection measures to address the impacts to these trees. Therefore, we ask that the applicants provide a Tree Constraints/Protection Plan to accompany this proposal.

Trees are susceptible to change caused by construction/development activity. As outlined in ‘BS5837:2012 - Trees in relation to design, demolition and construction’ (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction of any new infrastructure. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. It is imperative that Natural England and Forestry Commission’s standing advice on root protection areas for veteran trees is considered in planning decisions. This advice states: *“For ancient or veteran trees (including those on the woodland boundary), the **buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.**”*

### **Conclusion**

Veteran trees are irreplaceable habitats. Any development resulting in potential deterioration of veteran trees must consider all possible measures to ensure avoidance of adverse impact.

If you would like to get in touch regarding our representation, our contact email is [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk).

Yours sincerely,

Nicole Hillier  
Policy Advocate - Infrastructure