



I wish to raise concerns regarding the submitted Arboricultural Report (JCA Ref: 23060/AJB) and the limited weight that should be given to its conclusions.

Firstly, this document is only a BS5837 baseline survey and not an Arboricultural Impact Assessment (AIA). The report itself confirms that a further AIA would be required once development proposals are finalised. As such, it does not assess the actual impact of the proposed layout on trees, root protection areas, canopy loss or long-term pressures arising from the development. Without a full AIA, the true arboricultural implications of the scheme have not been properly evaluated.

Secondly, all recorded trees and hedgerows are categorised as Retention Category C (low value). However, the schedule shows several trees in good physiological and structural condition with a life expectancy of 40+ years. The blanket classification of all vegetation as “low value” appears reductive and does not reflect their cumulative landscape contribution, screening function, or ecological connectivity. BS5837 categories are not a substitute for wider planning judgement regarding landscape character and green infrastructure value.

The survey also only includes trees with a stem diameter greater than 75mm. This excludes younger trees, natural regeneration and developing scrub that may form part of habitat corridors or contribute to Biodiversity Net Gain calculations. Given the site’s greenfield context, the omission of smaller vegetation understates the site’s ecological and landscape baseline.

In addition, all inspections were undertaken from ground level only, with no climbed or detailed investigations. While acceptable for preliminary purposes, this limits certainty regarding condition and habitat potential. The report does not assess bat roost potential, nesting bird habitat, or the value of hedgerows under the Hedgerow Regulations 1997. Hedgerows are identified but not assessed for their ecological importance, despite their known role as priority habitats and wildlife corridors.

The document further notes that it is valid for one year only. If the application determination extends beyond this period, an updated survey would be required to ensure accuracy.

Overall, the report presents a narrow arboricultural snapshot rather than a comprehensive assessment of the site’s contribution to landscape structure and biodiversity. It does not quantify canopy cover loss, does not assess cumulative green infrastructure impact, and does not provide the impact analysis necessary to fully inform decision-making.

For these reasons, I respectfully request that the Council give limited weight to this baseline survey and require a full Arboricultural Impact Assessment and robust ecological evaluation before determining the application.