
The Cambourne to Cambridge Order

Transport And Works Act 1992

Transport And Works (Applications And Objections Procedure) (England And Wales) Rules 2006

Environmental Statement Addendum

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Cambourne to Cambridge

Environmental Statement (Addendum)



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1 Introduction and summary

1.1 Purpose of the Environmental Statement (ES) Addendum

- 1.1.1. This ES Addendum has been prepared in order to provide additional environmental information in support of the Transport and Works Act Order (TWAO) Application for the Cambourne to Cambridge (CtoC) project (the Scheme).
- 1.1.2. It has been prepared following a tree survey of Coton Orchard undertaken on March 18th 2025 in accordance with *BS5837:2012: Trees in relation to design, demolition and construction – Recommendations* (CD21-01)¹. The survey findings are reported along with an updated assessment of the status of the original Bramley apple trees within Coton Orchard, including those impacted by the Scheme. The mitigation proposed in light of those findings and how this affects the overall conclusions on likely significant effects, as previously reported in the ES Main Report (Cambourne to Cambridge Environmental Statement)² are also recorded in this Addendum. Where relevant, other aspects of the ES have also been considered and updated.

¹ British Standards Institution (2012). *Trees in relation to design, demolition and construction – Recommendations*.

- 1.1.3. In summary, the overall conclusions of the ES Main Report² with respect to the presentation of likely significant effects remain valid; no new or materially different significant effects are reported.

1.2 Legal context

- 1.2.1. In accordance with section 13B of the TWA 1992 (as amended), before determining an application for a TWAO for development requiring an Environmental Impact Assessment (EIA), the Secretary of State must consider the EIA information and must reach a reasoned conclusion about the likely significant effects of the proposed works or project on the environment. The reasoned conclusion must be taken into account in determining the application and when doing so, the Secretary of State must be satisfied that the reasoned conclusion is up to date.
- 1.2.2. For these purposes, Rule 17 of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 allows the Secretary of State to direct an applicant to supply additional information where the Secretary of State is of the opinion that this is required in respect of an ES. These provisions are intended to ensure that decision-makers and the public have access to a complete and up-to-date understanding of the likely significant environmental effects of a proposed development to enable those effects to be considered and taken into account in decision making.

² Environmental Statement (Document reference: CtoC-10-ES0).



- 1.2.3. In this particular case, no direction has been made by the Secretary of State under Rule 17 and the Applicant is submitting this ES Addendum of its own volition.

1.3 Additional environmental information

- 1.3.1. In providing updated information on the original Bramley apple trees in Coton Orchard which would be affected by the Scheme, this ES Addendum sets out respectively the background and context for this additional assessment information, the status assigned to these trees, the detail on the measures that will be taken to mitigate impacts and avoid likely significant effects, and the consideration of alternative alignments within Coton Orchard that sought to avoid the trees.

- 1.3.2. The ES Main Report and its supporting documents and technical reports are available at:

- Environmental Statement (Document reference: CtoC-10-ES0);
- Technical Report 1 – Acoustics (Document reference: CtoC-11-TR01);
- Technical Report 2 – Air Quality (Document reference: CtoC-11-TR02);
- Technical Report 3 – Climate Resilience (Document reference: CtoC-11-TR03);

- Technical Report 4 – Community and Human Health, Land Use and Land Take (Document reference: CtoC-11-TR04);
- Technical Report 5 – Ecological Impact Assessment (Document reference: CtoC-11-TR05);
- Technical Report 6 – Greenhouse Gases (Document reference: CtoC-11-TR06);
- Technical Report 7 – Heritage Impact Assessment (incorporating historic environment desk-based assessment) (Document reference: CtoC-11-TR07);
- Technical Report 8 – Landscape and Visual (Document reference: CtoC-11-TR08);
- Technical Report 9 – Major Accidents and Disasters (Document reference: CtoC-11-TR09);
- Technical Report 10 – Materials Assets and Waste (Document reference: CtoC-11-TR10);
- Technical Report 11 – Soil, Geology and Land Contamination (Document reference: CtoC-11-TR11);
- Technical Report 12 – Traffic and Transport (Document reference: CtoC-11-TR012);
- Technical Report 13 – Water (Document reference: CtoC-11-TR13); and
- Technical Report 14 – Arboriculture (Document reference: CtoC-11-TR14).



2 Updated Tree Assessment – Coton Orchard

2.1 Overview and background

- 2.1.1. Coton Orchard was planted in 1922, spanning an area of approximately 23 hectares (ha). Few fruit trees from the original planting remain, with most of the orchard now containing younger dwarf trees. The orchard itself has declined greatly in extent and in the amount of traditional orchard habitat: only about 30% of the 1922 orchard footprint is still extant, and the area managed as an orchard is now estimated at 6.9ha. An estimated 3.7ha is considered to be traditional orchard habitat of principal importance³. Of the remaining orchard habitat, 0.63ha contains the original orchard trees.
- 2.1.2. There are 12 surviving trees (numbered T2 – T13 in *Appendix 14.1 Coton Orchard Veteran Tree Review*⁴) that are

considered to be original orchard trees. One other original but dead tree numbered T1 remains only as a stump, and one smaller tree numbered T14 appears not to be old enough to be an original planting. The status of these trees has been the subject of further appraisal.

- 2.1.3. The 12 surviving original trees have been made subject to a tree preservation order (TPO) on 29th January 2025, which was recently confirmed on 9th April 2025.
- 2.1.4. The methods used initially to determine the veteran status of the trees are contained in the *ES Technical Report 14, Appendix 14.1 Coton Orchard Veteran Tree Review*⁴. This recognises that different methodological approaches yield different conclusions. Having acknowledged the different approaches to defining and assessing veteran trees, the ES appraisal concluded that two of the original Bramley apple trees (reference numbers T9 and T12 and shown in **Figure A1-1 in Appendix 1** of this ES Addendum) would qualify as veteran trees under the definition used in the National Planning Policy Framework (NPPF)⁵. This approach followed that previously used in the Brislington Meadows⁶ planning appeal decision. These matters, including the considerations and

³ Habitats of Principal Importance listed in section 41 of the Natural Environment and Rural Communities are the most important habitats for wildlife, which are protected by the NERC Act and the NPPF.

⁴ Appendix TR14.1 Coton Orchard Veteran Tree Review (Document reference: CtoC-11-TR14).

⁵ Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*. Available online at:

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed 17th June 2025].

⁶ In the planning appeal decision reference APP/Z0116/W/22/3308537, for the development of Land at Broomhill/Brislington Meadows, Broomhill Road, Bristol, the Inspector provided a useful assessment of definitions of ancient or veteran tree and concluded that the definitions in the NPPF are the most appropriate definition to use when deciding whether to grant planning permission



criteria that were used for determining veteran status under the NPPF, are set out in full in *Appendix TR14.1*⁴.

- 2.1.5. *Appendix TR14.1*⁴ also acknowledges that, in the context of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (BNG Regulations)⁷, all 12 of the original living trees, as well as the dead tree stump, meet the definition of being veteran for the purposes of calculating BNG under the BNG Regulations due to their extensive decay features.

Veteran tree definition

A veteran tree is defined in the NPPF⁵ (updated in December 2024; amended 7th February 2025), as:

A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Alongside the framework, there is the official standing advice from Natural England and Forestry Commission in respect of making planning decisions where there are veteran trees⁸. It states:

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.

These quite general definitions have necessitated a variety of more detailed methods to distinguish veteran from non-veteran trees as reported in *Appendix TR14.1*⁴.

- 2.1.6. The original Bramleys were resurveyed on 18th March 2025. The resurveys were carried out by Chris Alder of Barrell Tree Consultancy⁹. A full record of the status of the original Bramley trees based on the findings of the March 18th survey is presented in **Appendix 1**.
- 2.1.7. In line with the advice in the *ES Technical Report Appendix TR14.2 – Draft Veteran Tree Mitigation (including Compensation) Strategy*¹⁰, there remain a number of solutions that could be used to mitigate potential impacts by respectively protecting and transplanting the trees most directly at risk from the Scheme. These comprise six of the 12 original Bramleys that are situated wholly or partly within the draft Order Limits. These measures are set out in *Appendix TR14.2*¹⁰, with additional information provided in this addendum.

⁷ Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (Biodiversity Net Gain (BNG) Regulations). Available online at: <https://www.legislation.gov.uk/uksi/2024/48/contents/made> [Accessed 3rd June 2025]

⁸ Natural England and Forestry Commission (2022). Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. Available online at: <https://www.gov.uk/guidance/ancient-woodland->

[ancient-trees-and-veteran-trees-advice-for-making-planning-decisions](#) [Accessed 3rd June 2025].

⁹ BTEC Higher National Diploma in Arboriculture, Master of Science Degree in Resource Management (Arboriculture), Chartered Forester, Fellow and Registered Consultant of the Arboricultural Association.

¹⁰ Appendix TR14.2 – Draft Veteran Tree Mitigation (including Compensation) Strategy (Document reference: CtoC-11-TR14).



- 2.1.8. As a result of this additional assessment the view that, from a planning perspective, the status of the trees should be considered as veteran has been confirmed.
- 2.1.9. From the perspective of the ES and the consideration of Likely Significant Effects, there is no material change to the ES and its conclusions as it has always been recognised that from a BNG Regulations perspective the trees had veteran characteristics. This is set out in *TR05 Ecology*¹¹ at paragraph 5.3.26 where it is stated *“For the purposes of the BNG plan following the grant of a TWAO and deemed planning permission, the arboriculture assessment determined that all 14 trees meet the definition of veteran trees defined within the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. Six of these trees are within the Scheme boundary.”*
- 2.1.10. In terms of deriving significance of effects, *TR05*¹¹ at paragraph 4.4 and specifically table TR5-4-1 set out the impact assessment classification. Paragraph 5.2.1. of *TR05*¹¹ states that *“Local Nature Reserves (LNR) are valued as being of County importance, as are non-statutory designated sites (County and City Wildlife Sites)”*. Table TR5-11-1 of *TR05*¹¹ records that the significance of effect on Coton Orchard County Wildlife Site is significant at a county scale.
- 2.1.11. The main ES² states at paragraph 8.3.7 *“Due to the extent of habitat loss within the Coton Orchard County Wildlife Site, the effect on this non-statutory designated site is considered to be*

significant at a county scale” and at paragraph 8.3.17 *“The loss of 0.42ha of traditional orchard will not be compensated for within the Order Limits as its specific management requirements and the relatively small area concerned would preclude its creation near the busway. Similarly, a net loss of 1.29km hedgerow will not be mitigated within the Order Limits as this may not accord with wider landscape principles. The loss of both of these habitats will be a significant effect of importance at a county scale”*. In addition, the results of assessment of other features associated with Coton Orchard such as invertebrates, bat species, birds and habitats reported in the ES remain unchanged as they are not contingent on the classification of veteran trees.

- 2.1.12. It can therefore be concluded that the value of the Coton Orchard and associated veteran trees and the assessment significance of effect upon them remain unchanged (see also Section 2.5 below).

2.2 Veteran tree status in Coton Orchard

- 2.2.1. Following the updated survey on 18th March 2025, it was concluded that 12 of the surveyed, original Bramley apple trees should be deemed to have veteran status. The dead stump numbered T1 is not considered to be veteran, and T14 is not considered to be old enough, large enough or in a condition consistent with veteran status.

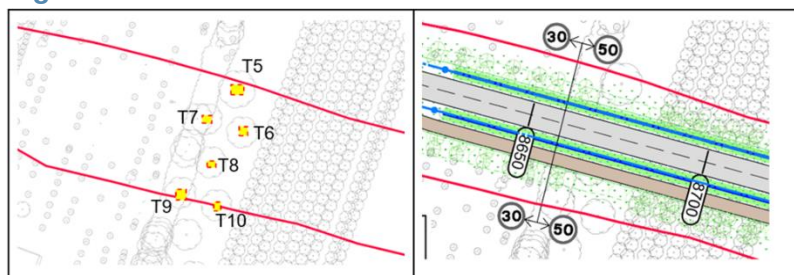
¹¹ Technical Report 5 – Ecological Impact Assessment (Document reference: CtoC-11-TR05).

- 2.2.2. As evident from **Table A1-1** in **Appendix 1**, the 12 trees T2-T13 vary in the number and detail of veteran tree attributes, such as size, hollowing, decay, crown retrenchment and presence of indicator fungi species. The trees are all in an advanced life stage with evidence of decay, hollowing and associated features such as crown retrenchment, which shows a complex colony structure and demonstration of resilience. The trees have passed maturity and are in a process of decline in crown size, have extensive hollowing and associated decay, and show a reduction of vigour, all consistent with the characteristics of being veteran trees.

2.3 Mitigation plan

- 2.3.1. Six of the trees (T5-T10) are situated within the draft Order Limits shown as red lines in **Figure 2-1**.

Figure 2-1 - Locations of tree T5 - T10



- 2.3.2. As reported in *Appendix 14.2 to TR14, Draft Veteran Tree Mitigation (including Compensation) Strategy*¹⁰, proposals to mitigate impacts on the six trees within the draft Order Limits will ensure that the trees can be retained, either through implementation of necessary protective measures (for trees T5, T9 and T10) or by transplanting to an alternative location

(for trees T6, T7 and T8) within the draft Order Limits or, with agreement of the land owners, to a nearer site within the orchard. This is discussed further below.

Veteran tree protection

- 2.3.3. Because T5, T9 and T10 are situated at the edge of the draft Order Limits, it will be possible to ensure they are retained in a healthy condition, through care in detailed design that seeks to maximise distances of built structures from the relevant trees where practicable, and implementation of specific protective and management techniques. Sections 2.2 and 2.3 of *Appendix 14.2*¹⁰ to *TR14* set out the approach for managing and protecting T5, T9 and T10 which will involve interventions respectively to protect and enhance the rooting environment; and to protect and enhance their above ground environment.
- 2.3.4. Detailed design considerations will include minimising the extent of site clearance and making minor adjustments to the alignments of the busway and the maintenance and access track such that these trees can be avoided.
- 2.3.5. Physical protective works will use a combination of physical barrier installation to create a Construction Exclusion Zone (CEZ) in accordance with Section 6 of BS5837:2012; and design of a specially engineered surfacing installation to prevent impact to roots following the guidance in Section 7.4 of BS5837:2012. The latter has been proposed (in agreement with the Cambridge City Council tree officer) for the route along Rifle Range to secure protection of the three TPO trees

immediately north of the alignment (see *ES Appendix TR14.3 - Rifle Range Track - Tree Protection Proposals*¹²).

- 2.3.6. Improvements will be required to the rooting environment through the use of decompaction measures, appropriate weed control and physical exclusion of damaging practices. Aside from preventing disturbance, above ground measures will include sensitive and phased pruning and regular monitoring of construction activity.
- 2.3.7. The Arboricultural Method Statement (AMS), requirements for which are secured through Planning Condition 10 (see document reference: *CtoC-14-00*) will provide the detailed approach to tree protection.
- 2.3.8. Examples of management consideration to include in the AMS are summarised below.

Arboricultural Method Statement (AMS): example of tree protection measures

Pre-commencement meeting on site, including the land owner where applicable, site manager, supervising arboriculturist (SArb) and the Local Planning Authority tree officer, to discuss agreed tree protection measures and all aspects of implementation and sequencing, including form and location of fencing and ground protection, as well as ongoing monitoring programme. There will be a presumption that those details are agreed, unless advised to the contrary by the regulatory authority.

Personnel briefing to ensure details of the AMS and any agreed amendments are known and understood by all site personnel. Copies of the agreed documents will be available on site, and all personnel who could have an impact on trees will be briefed on the specific tree protection requirements. Requirements to be written into the site management documentation.

Supervision visits and reporting. The SArb to provide supervision and monitoring over agreed period and frequency, as well as on-call access. Following the pre-commencement visit, subsequent visits to check compliance and performance, as well as to check tree health and condition.

Watching brief for sensitive operations, briefing the construction team and guiding and monitoring specific operations with a view to preventing any harm to retained trees.

¹² Appendix TR14.3 - Rifle Range Track - Tree Protection Proposals
(Document reference: CtoC-11-TR14)



Veteran tree transplanting

- 2.3.9. Transplanting of trees is a long-standing, tried and tested method for retaining important trees where their loss can be avoided. Specialists in tree moving will be commissioned to provide a detailed methodology for their removal to cover preparation of the trees, receptor site, lifting process, planting and support, and long-term post planting maintenance.
- 2.3.10. Apple trees T6, T7 and T8 are considered to be of sufficient size and condition to allow for successful transplanting. This would involve an optimum lead time of up to three years (or at least two dormant seasons) for root pruning prior to transplanting followed by competent monitoring and aftercare whilst re-growing their roots to their original sizes over approximately 10 years.
- 2.3.11. A site visit will confirm the methodology involving root investigation, in conjunction with the first root prune to gain an understanding of the root systems of the affected trees, which in turn will influence the rootball size and inform the root pruning recommendations.
- 2.3.12. Root pruning stimulates root growth inside the rootball, allowing a higher percentage of root mass to be transplanted. In addition it dissipates the stress of root severance over successive root pruning events and reduces the energy spent on repairing and defending pruning cuts.

- 2.3.13. Mulching of trees will boost the mycorrhizal activity and soil biology through the addition of organic matter as it composts down, moderates soil temperature, and protects the rootball from the impact of sun baking. It suppresses weeds, retains moisture and negates the need for mowers and strimmers away from the trunk.
- 2.3.14. Careful management of soil biology during root pruning will help ensure that managed root systems adapt to the conditions making them healthier and more resilient. The Balling Relative Intensity Index (BRIX) level of each tree will be monitored and boosted if required by applying complex sugars¹³.
- 2.3.15. Rootballs will be incrementally wrapped in hessian and rootballing wire. Zeolite (micro porous habitats seeded with optimum mycorrhizal fungi and soil bacteria strains) will be located under the hessian and within the backfill. Each section will be faced with Air Pot® to stimulate fibrous root growth, build up resources in the roots (triggered by the air pruning) and prevent root girdling or over watering.
- 2.3.16. The optimum drainage regime will be critical, and leaving an open area may not be desirable if it fills with water. Where such a risk is determined, the rootball may need to be wrapped in a root barrier.
- 2.3.17. Over the spring and summers between root prunes and up to transplanting, the trees will need to be competently monitored and cared for. Provision of a water supply to the donor (and final) area would greatly assist the delivery of aftercare,

¹³ The Balling Relative Intensity Index is the measure of how much sugar is in the plant sap. It can be raised by adding nitrogen rich fertilizer, watering

more often, pruning out dead branches or leaves, and removing any weeds that could be taking up water.



potentially automated to and controlled by moisture sensors to ease watering demands.

- 2.3.18. The trees are likely to produce epicormic growths (i.e. a shoot or branch growing from a previously dormant bud on the trunk or a limb of a tree), in a response to root pruning, which should be regularly removed. With regard to the reduction of canopies, this is usually undertaken to reduce the sail effect of the canopies with a reduced rootball or to correct an imbalance that also risks the tree leaning. The aim is to firstly undertake this after a full summer of photosynthesis, but also to avoid having to attend to pruning cuts on roots and within the canopy, at the same time. Any pruning is undertaken so not to simulate both unnatural branch unions from pruning cuts and regular pruning to correct these.
- 2.3.19. After root pruning the trees will be completely islanded and wrapped in Air Pot®. At this stage it is assumed the method of lifting will be an excavator with a bespoke cutting blade, driven underneath the rootball. The tree will be secured to the blade, lifted, carefully transported and planted into a pre-excavated pit. There would be lifting only from underneath and no lifting occurs on the trunk.
- 2.3.20. If this method is deemed unsuitable, due either to the tree (roots) or the soil, a floor of pipe will be driven under and secured over the rootball. Depending on where the receptor site is, the trees would be dragged on a pipe road to their new locations, crane lifted or loaded onto a low loader and transported to their new location.
- 2.3.21. The planting sites will have been tested for their similarity to the donor sites: planting pits will be percolation tested and if

deemed necessary soil pH & health will be tested. The trees will be carefully placed in the planting pits, probably planted slightly raised. They will be secured with underground and overhead duckbill guys, with the aim of removing the overhead guys after three winters and cutting the underground and removing from across the top of the rootball a couple of years later.

- 2.3.22. Aeration/irrigation pipes with four vertical capped pipes will be wrapped around the rootballs. The backfill will be mainly spoil with some of the adjoining (unexcavated) soil from the donor sites, plus peat free compost (with a three-year natural fertilising effect), Zeolite and water storing polymer. The rootball and immediate area outside will be drenched with compost tea.
- 2.3.23. The trees will be mulched, with composted whole tree mulch to one metre past their rootballs. A drip irrigation system will be installed around each tree, ideally controlled by moisture sensors to only provide water when the soils need it or using an automated system controlled by a manually adjusted timer.
- 2.3.24. The trees will need assistance establishing for around 10 years, whilst their roots regrow to their former size. Aftercare will be primarily through competent monitoring and watering, with mulch topped up annually and applications of soil biology three times a year for the first two years. As the trees establish the level of aftercare is reduced.
- 2.3.25. It is likely that the trees will produce more epicormic growth than normal. As this diverts energy from the canopy, this would need to be regularly removed.



- 2.3.26. A photographic record will be maintained over each tree from the first site visit until the end of aftercare. In addition annual extension growth will be recorded. BRIX levels will be recorded in spring and summer. Each visit, including aftercare, will generate a brief report (of works, comments on trees and images).
- 2.3.27. The proposed site for transplanting within the draft Order Limits, together with the potential alternative within the orchard, are shown in **Figure 2-2**.



Figure 2-2 - Proposed receptor sites for transplanted veteran Bramley apple trees



2.4 Consideration of alternatives

- 2.4.1. Details on the Scheme's evolution, including consideration of options that did not cross Coton Orchard are provided in Chapter 4 of the ES Main Report². As stated in paragraph 4.6.6 of the ES Main Report², a minor northward shift in alignment through Coton Orchard was considered in October 2022. This alignment used a gap that avoided the original Bramley apple trees by following a more central route through the orchard.
- 2.4.2. This northern option was presented to the directly affected parties, namely Cambridge Past Present and Future (CPPF), who own the fields west of Cambridge Road; and with Houston Crest Properties Limited, who own the orchard.
- 2.4.3. CPPF stated in correspondence (21st October 2022) that they neither liked nor supported either route and preferred a route alignment within the A1303 corridor. Notwithstanding this, their stated concerns with the northern option included its increased severance of their fields west of the orchard and consequent reduced viability as agricultural holdings; its location higher up the slope of Madingley Hill making it more visible; the increased scale of necessary earthworks further exacerbating landtake and landscape and visual impact; and the requirement for a crossing in a more open countryside location away from the village edge, with inherent risk of harm and urbanising impact on the village setting. CPPF also identified a lessened opportunity for landscape screening given the landtake impacts that this would have entailed.

- 2.4.4. While avoidance of the original Bramleys had been the objective of the northern option, based on its wider landscape (and land use) impacts, together with the achievable mitigation (as described in TR14-2¹⁰) the northern option was not considered to offer any advantage over the proposed alignment and was not progressed further.
- 2.4.5. It is also germane that the northern option would have been inferior on operational and safety grounds, as well as having more complex (and expensive) construction requirements:
- **Accessibility:** The northern option would have crossed Cambridge Road further north, placing bus stops approximately 100m further from Coton village than the proposed alignment, and reducing the number of properties within the 400m walking distance recommended in Inclusive Mobility (Department for Transport, Dec 2021).
 - **Safety:** The proposed Scheme alignment offers a more perpendicular westbound approach to the proposed accommodation and public rights of way crossings than the northern option, which would have offered worse intervisibility.
 - **Severance and land take:** The larger footprint of the northern option would have increased land take.
 - **Earthworks:** The more extensive excavation required for the northern option, with deeper and wider cuttings, would have increased financial as well as environmental costs.

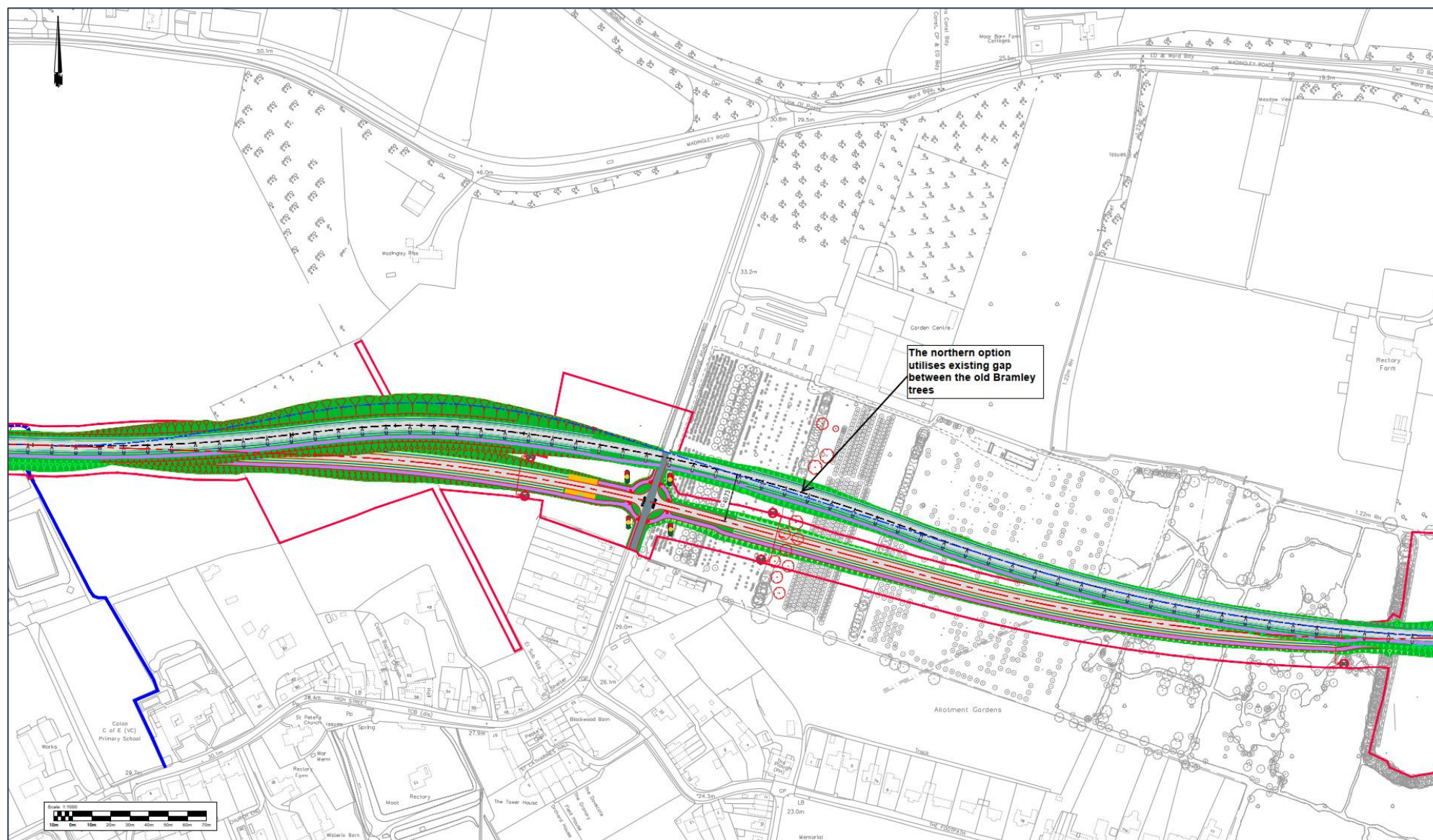


- 2.4.6. A response from Coton Orchard Limited¹⁴ (1st November 2022) stated a strong objection to *“any alignment of the C2C scheme that transects Coton Orchard”*, further stating that *“... small modifications to the alignment to save felling the very “oldest trees” is, in my opinion, a distraction from the enormous environmental impact of the proposed route taken as a whole”*.
- 2.4.7. **Figure 2-3** illustrates the proposed Scheme alignment alongside the northern option.

¹⁴ Correspondence with regard to Coton Orchard has been received either from the owners, Houston Crest Properties Limited, or the tenants, Coton Orchard Limited, but under the same signature of Anna Gazeley.



Figure 2-3 - Proposed Scheme through Coton Orchard and the northern option



2.5 Conclusions

- 2.5.1. Trees numbered T2-T13 are considered to be of veteran quality. T1 is a dead stump; T14 does not have sufficient features to be regarded a veteran and is not considered to form part of the group of original Bramleys.
- 2.5.2. Trees T5, T9 and T10 are located in the draft Order Limits but, at its edge, can be protected from impact by careful detailed Scheme design and construction and the implementation of specific protection measures to avoid adverse impacts on their health and longevity.
- 2.5.3. Trees T6, T7 and T8 are more centrally located within the draft Order Limits and would need to be relocated to facilitate delivery of the Scheme. To avoid their loss they will be transplanted to an appropriately prepared and suitable receptor site in a way that will not be detrimental to their habitat value or life span. Management of the transplantation process will be achieved through adherence to a detailed methodology and appropriate supervision, and using specialist contractors.
- 2.5.4. In addition, there is considerable scope for positive orchard restoration management as considered within the ES *Appendix 14.2 – Draft Veteran Tree Mitigation (including Compensation) Strategy*¹⁰ in the submissions, which coupled with new planting will greatly enhance and improve the tree cover, diversity and contribution to habitat value. Ongoing monitoring and evidence-based management where appropriate is essential to maintain the trees for the future, although this will require the landowner's agreement if outside the draft Order Limits.

- 2.5.5. Taking these matters into account, the overall conclusions of the ES remain unchanged with respect to the occurrence of likely significant effects. The ES Main Report² describes these in full, including the likely significant ecological effects that will arise from the Scheme's impact on Coton Orchard as a county wildlife site, as well as its impact on traditional orchard habitat. The ecological impact assessment had already considered the original Bramleys to be veteran trees based on their categorisation under the BNG Regulations, and the likely significant effects so reported are unaffected by the now more general categorisation of these trees as veteran trees. Moreover, potential impacts on the trees are mitigated (as explained in Section 2.3) through protection and transplantation.



APPENDIX 1: ARBORICULTURAL SURVEY FINDINGS

Table A1-1 – Coton Orchard tree survey results

Tree no	Species	Height (m)	Diameter (cm) @ 1.5 m	Category	Notes	Crown spread (m) N, E, S, W
T1	Bramley apple	2	60	U	Stump, elder growing within	
T2	Bramley apple	5	65	A	Hollow stem, Innonotus hispidus present, branch hollowing, deadwood and decay from pruning wounds	4.6, 6.2, 6.1, 2
T3	Bramley apple	5	65	A	Hollow stem and main branches, old Innonotus bracket present	5, 5.5, 4.9, 4.9
T4	Bramley apple	5	62.5	A	Stem hollowing, main branches decayed wounds and hollowing, old Innonotus bracket present	6.1, 5.2, 6.2, 4.3
T5	Bramley apple	5	70	A	Decay present, old Innonotus bracket on branches, stem intact, branch hollowing to nw and se	5.7, 5.2, 4.9, 4.7
T6	Bramley apple	4	55	A	Hollow stem, longitudinal crack down stem, branch decay and hollowing	4.3, 4.1, 3.2, 3.3
T7	Bramley apple	5	52.5	A	Suppressed by hedge to west, hollow stem and main branches	5.7, 5.3, 5.8, 1
T8	Bramley apple	5	57.5	A	Old Innonotus bracket on branches, branch hollowing from old wounds, hollowing stem, swelling at stem base	6.3, 5.3, 5.1, 5.2
T9	Bramley apple	5	72.5	A	Old Ganoderma sp bracket on stem, hollowing stem and main branches, decay at branch ends, suppressed by hedge and shrubs to west	5, 6, 3, 1
T10	Bramley apple	5	65	A	Branch hollowing, decay at pruned ends, woodpecker holes	4.2, 4.7, 5.1, 6.1
T11	Bramley apple	5	60	A	Southern branch dead and failed, hollow stem, decay at pruning wounds, hollowing branches	5.1, 1, 5, 4.3
T12	Bramley apple	4	80	A	Hollow stem and main limbs, pruning wounds decaying, holes and deadwood	6.2, 3.8, 3.2, 3
T13	Bramley apple	4	65	A	Hollow stem and branches, failed lateral branches, extensive decay and deadwood	4.5, 5, 6, 1
T14	Bramley apple	4	42.5	C	Significant dead branches due to suppression by adjacent by hedge, probable replacement tree, it is much smaller than others	4.2, 5.2, 5.5, 2





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