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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

REBUTTAL IN RELATION TO ARBORICULTURE

of

Chris Alder MSc HNDArb FARborA, MICFor, RCarborA

of Barrell Tree Consultancy

On behalf of Cambridgeshire County Council

9th September 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

- 1.1.1 This rebuttal has been prepared in response to the Proofs of Evidence of Coton Orchard Ltd and Crest Properties Ltd **[CD26-02 OBJ-52]** in relation to arboricultural matters.
- 1.1.2 My name is Chris Alder. I am an Associate Director at Barrell Tree Consultancy. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence **[CD26-01-APP-W4-01]**.
- 1.1.3 This rebuttal has been prepared with the expectation that it will assist the Inspectors with consideration of the issues raised.
- 1.1.4 The fact that a point has not been responded to should not be taken as indicating that it is accepted.

2. SCOPE OF REBUTTAL

- 2.1.1 The scope of my rebuttal is specifically in response to matters raised in the Proof of Evidence of Coton Orchard Ltd and Crest Properties Ltd **[CD26-02 OBJ-52]** entitled Coton Orchard Limited Proof of Evidence. The proof questions that the scheme ignores national policy and environmental protection in relation to veteran trees, and that the trees proposed for translocation will not survive.

3. REBUTTAL

3.1 Rebuttal - Ignoring national policy and environmental protection.

- 3.1.1 Within the Proof of Evidence in section 4 starting on page 7 it is stated;

“In January 2025, South Cambridgeshire District Council issued a Tree Protection (sic) Order covering the veteran trees. The TEMPO score was 16, well above the threshold. The orchard’s formal status as a County Wildlife Site confirms its irreplaceability.

National policy is also clear. The NPPF states that development resulting in the loss of irreplaceable habitats should be refused unless there are “wholly exceptional reasons.” Veteran trees fall into that category. There is no “exceptional” justification here—no housing target, no safety imperative, no overwhelming public need.”
- 3.1.2 In response to the matters raised concerning the tree preservation order (TPO), I have covered this matter in my proof **[CD26-01-APP-W4-1]** at para 3.5 on page 9. The TPO was not supported by the Council officers because the protection afforded the trees by making the TPO would be entirely extinguished by the exceptions identified by the officers under Regulation 14 of the Town and Country Planning (Tree Preservation)(England) Regulations 2012.
- 3.1.3 The TEMPO score was conducted treating the 12 trees as a group, however the TPO was made protecting the trees as individuals. As described in my proof, 3 of the 12 trees are within the route of the busway and directly affected such that they are proposed to be transplanted. The other 9 trees are not under threat. I agree with the Council officers that the making of the TPO was not expedient in this instance.
- 3.1.4 County Wildlife Sites don’t have statutory designation status, and whilst important in contributing to wildlife conservation they do not impose restrictions on the landowners who may manage their land as they see fit.
- 3.1.5 In response to matters raised concerning National Policy, the proposal is not to lose any of the veteran trees, but to retain the three trees (T6, T7 and T8) that are directly within the proposed busway route by translocating them to a suitable receptor site. I have set out in my proof the methodology for translocation and referenced the experience and expertise of specialist contractors capable of undertaking such translocation.

3.2 Rebuttal - Trees will not survive translocation.

3.2.1 In the Supplementary notes starting in the paragraph at the bottom of page 12 of the Coton Orchard proof, it is claimed that the trees would not survive translocation and includes two peer reviewed research references.

- (a) Cowan, G., et al. (2011). Physiological decline in mature transplanted trees, Arb Journal, 33(4), 235–248, and
- (b) Strouts, R., & Winter, T. (1994). Veteran Trees: A Guide to Good Management, Ancient Tree Forum.

3.2.2 I am unable to find the article that Coton Orchard refer to in (a) above in any issue of the Arboricultural Journal. The volume and issue number referred to does not contain that article, (see the contents of that issue in image 1 below), and conducting an online search for the author Cowan G. et al, did not reveal any such article. I am unable to comment on the quote '*transplanting mature trees results in extensive root loss and high mortality*' without the source material.

ARBORICULTURAL JOURNAL	
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Editor: Ian D. Rotherham	
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Image 1: Contents of Arboricultural Journal, Volume 33(4) April 2011.

3.2.3 The link at the bottom of page 13 takes the reader to a text which supersedes the 1994 reference in (b) above. The book in the link is by Read H., (2000) *Veteran Trees: A guide to good management*. Nowhere in that publication does it state that '*Veteran trees should not be moved....because of the high risk that they will not survive the shock of being transplanted*', and I would therefore query its validity.

3.2.4 In the 1st paragraph on page 13 the proof states:

'No respected arboricultural body supports translocation of fruit trees as compensation. The science is unequivocal: veteran trees must be protected in situ.'

3.2.5 In response, I am not aware of published evidence to support these assertions. Transplanting trees is a specialist operation that should in my opinion only be carried out by experienced and knowledgeable operators. Transplanting important trees is a valid method of retaining a valuable resource. The process is covered in my proof at section 6 on page 16 which summarises the provided experts (Ruskins) methodology included at Appendix 3 of my proof. The Ruskins methodology takes account of the need to provide early preparation, careful handling during lifting, and long term focussed aftercare.

4. STATEMENT OF TRUTH

4.1.1 The rebuttal which I have prepared and provide is true and is given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true and professional opinions.