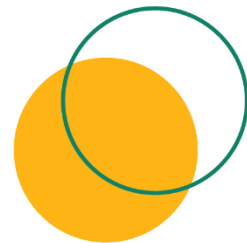




Arboricultural Impact Assessment (AIA) and Method Statement



Paul Vinyard
Dorothy House Hospice Care, Winsley, Bradford on Avon, Wiltshire, BA15 2LE

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1 Introduction

1.1 Overview

Paul Vinyard ('the client') is seeking consent for a proposed development at Dorothy House Hospice Care, Winsley, Bradford on Avon, Wiltshire, BA15 2LE (hereafter referred to as the 'proposed development site'), which is within Wiltshire Council (WC).

The proposal is for a double-storey extension to the Nicholson House building located northwest of Dorothy House (Appendix A).

ACP Consultants Ltd. was instructed by the client to produce an Arboricultural Impact Assessment (AIA) to accompany the planning application to the WC for consent to undertake the proposed work. Surveys were conducted on the 4th of September 2025 and 5th of December by Brydie Stacey and David Stanley (TechArborA).

The purpose of the AIA in accordance with BS5837, is to provide guidance on how trees and other vegetation can be integrated into construction and development design schemes. The overall aim is to ensure the protection of trees which are appropriate for retention.

As the proposal relates to development works at site, the advice herein is produced in accordance with the British Standard 5837: 2012 '*Trees in Relation to Design, Demolition and Construction - Recommendations*' (hereafter; BS5837).

Local Authorities are tasked with determining new development and local planning applications against a wide range of social, economic, and environmental criteria. The purpose of this report is to assess whether the development proposal is compliant with the relevant local policies in terms of ecological impact as a result of the proposed commercial development.

This assessment has been carried out in accordance with good practice guidelines, including the National Planning Policy Framework (2024) and applicable local supplementary guidance. Relevant national and local planning policies and legislation can be found in Appendix E.

The remainder of this report is presented in the following order:

- Section 2: Methodology
- Section 3: Results and Evaluation
- Section 4: Discussion and Recommendations
- Section 5: Conclusions

2 Methodology

2.1 Site Assessment

The site currently comprises a care home, associated areas of hardstanding ground, vegetated gardens and several mature trees.

The site requires consideration from an Arboricultural perspective due to the presence of multiple trees on site; these trees are deemed to be within impacting distance of the potential construction area.

2.2 BS5837 Tree Survey

On the 4th of September 2025, the field survey was completed at the site in order to obtain detailed baseline information regarding the trees present on the site. A second site visit was also conducted on the 5th of December by David Stanley (TechArborA) in order to verify the initial dataset and gather additional information where required.

The tree survey and assessment resulted in the BS5837 quality/retention categories ranging from 'A'- 'U' due to the varying contribution to the wider landscape and overall merit. It is also worth noting that the BS5837 circular RPAs are considered to halt at the extents of existing property, driveways and substantial walls.

Trees were generally in reasonable condition. No significant defects were detected, although minor defects such as slight leans that require long-term monitoring and varying degrees of ivy coverage (which had the potential to conceal defects) were noted in T10, T11, T12, T13, T14, T15, T22, T23, T24 and T26-T32 as outlined in Appendix C. For such trees (and other trees), a routine monitoring plan is considered sufficient to ensure the safe retention of the trees.

Further data can be found in Appendix C, alongside the tree locations shown in the Tree Constraints Plan (Appendix B).

2.3 Limitations

This report is valid for one year from the date of inspection. Trees are living organisms, and no responsibility can be accepted by the surveyor for the failure of a tree or part of a tree due to adverse weather conditions, force majeure, or other unpredictable occurrences. It is the responsibility of the tree owner to inspect and maintain their trees on a regular basis.

This document does not contain a comprehensive list of botanical species on site. Only plant species characteristics of each habitat and incidental observations of notable plant species were recorded. In addition, many plant species are only evident at certain times of year and so some plant species may have gone undetected.

Any third party and external data sources used may vary due to the quality and scale, the supporting information used to define locations/boundaries and sensitivity of the data itself. ACP Consultants Ltd. cannot take responsibility for the accuracy of external data sources and as such discrepancies and inaccuracies may occur.

Seasonal limitations also exist in regard to species identification. Where a species cannot be identified in the winter due to leaf shedding or other variables, the species has been marked as deciduous.

No council search/contact has been requested and hence confirmation as to whether any of the trees are protected by Tree Preservation Order was unavailable at the time of writing this advice.

A small number of trees had limited accessibility or had been included in the topographical survey despite being mature shrubs, as outlined in Appendix C. However, such limitations are not considered to be significant.

It is worth noting that adverse weather conditions posed a limitation on the second site visit. As such, the survey effort (the collection of additional data) was focused on trees in close proximity to the

proposed extension or that may reasonably be expected to conflict with development plans. Moreover, the majority of trees existing on-site stood outside of the redline application boundary and were not deemed likely to be impacted by the extension (both in terms of their Root Protection Areas and current crown spread/future growth). Despite the limiting conditions, all data was collected for trees within impacting distance. Section 5.3.4 from the BS5837 methodology also states that:

'A realistic assessment of the probable impact of any proposed development on the trees and vice versa should take into account the characteristics and condition of the trees, with due allowance and space for their future growth and maintenance requirements.'

Therefore, whilst a full dataset could not be collected for some trees, this is not considered to be a constraining factor as they are not realistically expected to be impacted, as supported by BS5837 guidance. It is also worth noting that where any data between both site visits varied (due to any seasonal variations etc.), the higher value was retained as a precautionary measure.

It is also worth noting that T1 and T2 had been felled between the first and second survey. Therefore, the data for these two trees has not been included within the Tree Constraints Plan and BS5837 Data Table in Appendix C.

3 Results and Evaluation

3.1 Survey Conditions

Table 1: Summary of conditions during survey

Abiotic Factor	Survey 1
Survey type	BS5837
Date completed	04.09.25
Temperature	15 degrees Celsius
Precipitation	0
Weather Conditions	Partially cloudy

3.2 General Considerations for Tree Retention/Removal

It is understood from plans provided by the client that all existing trees displayed in the Tree Constraints Plan (Appendix B) are to be retained and that no tree removals are proposed. There are no Tree Preservation Orders (TPOs) present on-site.

Due to existing trees being of high, moderate and unremarkable quality and merit, trees have been categorised as BS5837 Category 'A', 'B' and 'C' (Appendix C) as shown in Figure 1. No significant defects were identified in any of the trees on-site, although varying degrees of vegetation coverage had the potential to conceal defects. Routine monitoring and maintenance has been recommended.

The Tree Constraints Plan (TCP) in Appendix B shows that encroachment into the Root Protection Areas of T16-T19 is expected to occur, meaning further considerations will be required.

Category and definition	Criteria (including subcategories where appropriate)			Identification on plan
Trees unsuitable for retention (see Note)				
Category U Those in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years	- Trees that have a serious, irremediable, structural defect, such that their early loss is expected due to collapse, including those that will become unviable after removal of other category U trees (e.g. where, for whatever reason, the loss of companion shelter cannot be mitigated by pruning) - Trees that are dead or are showing signs of significant, immediate, and irreversible overall decline - Trees infected with pathogens of significance to the health and/or safety of other trees nearby, or very low quality trees suppressing adjacent trees of better quality <i>NOTE Category U trees can have existing or potential conservation value which it might be desirable to preserve; see 4.5.7.</i>			See Table 2
	1 Mainly arboricultural qualities	2 Mainly landscape qualities	3 Mainly cultural values, including conservation	
Trees to be considered for retention				
Category A Trees of high quality with an estimated remaining life expectancy of at least 40 years	Trees that are particularly good examples of their species, especially if rare or unusual; or those that are essential components of groups or formal or semi-formal arboricultural features (e.g. the dominant and/or principal trees within an avenue)	Trees, groups or woodlands of particular visual importance as arboricultural and/or landscape features	Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e.g. veteran trees or wood-pasture)	See Table 2
Category B Trees of moderate quality with an estimated remaining life expectancy of at least 20 years	Trees that might be included in category A, but are downgraded because of impaired condition (e.g. presence of significant though remediable defects, including unsympathetic past management and storm damage), such that they are unlikely to be suitable for retention for beyond 40 years; or trees lacking the special quality necessary to merit the category A designation	Trees present in numbers, usually growing as groups or woodlands, such that they attract a higher collective rating than they might as individuals; or trees occurring as collectives but situated so as to make little visual contribution to the wider locality	Trees with material conservation or other cultural value	See Table 2
Category C Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm	Unremarkable trees of very limited merit or such impaired condition that they do not qualify in higher categories	Trees present in groups or woodlands, but without this conferring on them significantly greater collective landscape value; and/or trees offering low or only temporary/transient landscape benefits	Trees with no material conservation or other cultural value	See Table 2

Figure 1 – Cascade Chart for Tree Quality Assessments (Source: BS 5837:2012)

3.2.1 Tree Works

Tree works are not recommended for existing trees as these were in reasonable condition, and no significant defects were observed (although varying degrees of vegetation coverage may have prevented significant defects from being observed). Regular monitoring and maintenance is recommended as a good practice measure. Furthermore, it is understood that no tree removals have been proposed.

3.2.2 Tree Crowns

Consideration is required for both existing and newly planted trees, whereby the proposed construction should consider trees reaching their full growth potential. It is always prudent to provide adequate clearance from a tree's current crown for future growth, i.e. to allow a tree adequate space to reach maturity without conflicts with new structures.

Proposed elevations show that the extension is two-storey, which extends into the Root Protection Areas of T16-T19, which are large mature trees with evenly spread crowns. The crown spread of trees realistically expected to be impacted by the proposed development was recorded during the second site visit and is displayed both in the BS5837 Data Table (Appendix C) and is marked in yellow in the Tree Constraints Plan (Appendix B). Such measurements show potential conflicts may occur with proposals and the crown spread of T16-T19 specifically. As demonstrated within the TCP, conflicts are not expected to be significant and can be remedied through regular management and pruning, whilst still allowing for future growth to occur.

Therefore, potential conflicts may occur in regard to future growth, although these are not expected to be significant when considering current crown structures (the affected crowns are large and evenly spread) and the proximity/extent of RPA encroachment (alongside minimal overlap with the crown and proposed extension). Therefore, it is considered that pruning in accordance with BS3998 is sufficient to mitigate any conflicts.

3.2.3 Root Protection Areas (RPAs)

As a minimum, it would be suitable to consider the outer extents of retained trees' RPAs (up to the previous foundations) as construction exclusion zones and to be protected. The RPAs can be seen in the Tree Constraints Plan (TCP) located in Appendix B.

The TCP shows that minimal encroachment into the RPAs of existing retained trees is expected. The RPAs of T16, T18 and T19 will be encroached upon in order to accommodate the proposed extension, which will also require digging/excavations. The percentage of encroachment is provided in Table 2 below. Therefore, further considerations will be required, including a sensitive working scheme to allow for development to occur within this area without impacting the long-term viability of T16-T19. This has been detailed in Section 5.

Table 2: Encroachment in Root Protection Areas

Tree Number	Total RPA Area (sqm)	RPA Encroachment (sqm)	Total Encroachment (%)
T16	706	41	5.8%
T17	706	45	6.4%
T18	183	12.2	6.7%
T19	183	19	10.4%

3.2.4 Demolition/Excavation Works

No demolition is anticipated to take place within the RPAs of existing trees. However, excavations associated with the proposed extension are anticipated to encroach within the RPAs of T16-T19. Said works should adhere to the RPA restrictions, be undertaken manually with handheld non-mechanical tools and ensure that existing ground levels are retained.

As excavations are required within the RPAs of T16–T19, the methodology for these works is confirmed as follows. All excavation within RPAs will be carried out manually using hand tools only (with no vehicular access permitted). Existing ground levels will be retained, and roots encountered will be retained and worked around; where unavoidable, any root greater than 25 mm diameter will only be pruned under the direction of the Arboricultural Supervisor.

No alternative excavation methods are proposed. The approach outlined above represents the agreed method for undertaking works within the RPAs and is intended for approval at determination. The Arboricultural Supervisor will oversee the initial excavation to ensure compliance with BS5837 and to confirm that root protection measures remain appropriate.

3.2.5 Hard Landscape Works

As with previously mentioned arboricultural restrictions to demolition/construction, the proposed works should avoid retained trees' RPAs. However, where ground works are proposed within the RPAs of retained trees, construction methods (for hard surfacing, walls etc.) should retain the existing ground levels, be undertaken sensitively and using a no dig design.

3.2.6 Planting Species and Volume

It is understood from plans submitted by the client that no new tree planting is proposed within the application boundary. As no tree removals are required, additional tree planting to mitigate for the loss of trees is not required. It is understood that tree planting is proposed within the wider site for Biodiversity Net Gain purposes. Whilst no mitigation measures/additional planting is required from an arboricultural perspective, it is recommended that proposed trees planted on the wider site are native species such as Hazel (*Corylus avellana*), Hawthorn (*Crataegus monogyna*), Silver Birch (*Betula pendula*), Rowan (*Sorbus aucuparia*), Field Maple (*Acer campestre*) and Crab Apple (*Malus sylvestris*).

3.2.7 Additional Details

The surveyed trees have been subject to a detailed inspection and the arboricultural considerations detailed within this advice. The advice herein is intended to guide a suitable design in consideration for the site's valuable amenity assets. Where retained trees are avoided and removed trees are mitigated, the considerations herein may form part of tree related planning conditions.

4 Discussion and Recommendations

4.1.1 Recommended Work

Based on the findings outlined above, no tree works are required (including the management of defects or tree removals), although minor pruning has been recommended where necessary in order to reduce potential crown conflicts (although this is not expected to be significant). As no tree removals are proposed, no additional tree planting for the purposes of mitigation is required.

The vast majority of trees within the wider site are not expected to be impacted by development, meaning the overall arboricultural impact of proposals is not considered to be significant. However, the Tree Constraints Plan (Appendix B) shows encroachment into the Root Protection Areas (RPAs) of T16-T19. As such encroachment is likely to involve excavations that have the potential to impact roots, the potential arboricultural impact on T16-19 may be significant and may impact the long-term viabilities of such trees. Therefore, further considerations are required.

4.1.2 Further Surveys

Further surveys/advice that are required following the BS5837 assessment are as follows:

- Root Protection Areas for retained trees should generally be considered as construction exclusion zones, with RPA restrictions adhered to throughout the development process.
- Due to the unavoidable RPA encroachment of T16-T19 (involving excavations), an Arboricultural Method Statement is required, which must detail how works may proceed in such a manner that minimises any potential impacts on the long-term viability of the trees. This has been undertaken by ACP Consultants Ltd. and is provided in Section 5.

5 Arboricultural Method Statement

5.1 Arboricultural Method Statement (AMS)

The purpose of this Method Statement is to demonstrate how aspects of the proposed development that have potential to result in loss/damage to any retained trees may be implemented and provide an adequate level of protection during the proposed works. A Tree Protection Plan is also provided in Appendix D.

Details of key site personnel, including site/project manager, will be submitted to the Council's Tree Officer prior to the commencement of site works.

No site personnel are to be present and no demolition, site clearance, building work or delivery of materials is to occur until the protective measures are in accordance with this method statement.

5.2 Phasing and Monitoring

The following phasing procedures are to protect the trees that are to be retained (all surveyed trees as well as T16-T19, which require further considerations), from the pre-development stage and construction stage to ensure their suitability for retention post development. The order in which the works should commence is as follows:

1. Pre-Commencement Site meeting – This should include a detailed discussion of the exact position of the protective fences, the necessity to ensure adequate supervision at key stages and who is responsible on site for the welfare of the trees.
2. Tree Surgery – Including all tree removals (none recommended at this stage) and pruning works (minor pruning where required to reduce potential crown conflicts).
3. Fencing should be erected prior to any development work commencing on site. No further work should be carried out until the tree officer has approved the deployment of the fencing.

5.3 Root Protection Area

Root Protection Areas (RPAs) have been calculated for every tree using the data shown in Appendix B (and maximum recorded RPAs or typical estimates for inaccessible trees as a precautionary measure). The RPA zone is designed to protect a functional minimum of tree root mass in order to ensure the tree remains healthy. Encroachment into the RPAs of T16-T19 is expected.

It is the responsibility of everyone involved during the development process to adhere to the tree protection measures and observe the necessary precautions within and adjacent to them. For details of the RPA's, please see Appendix C.

5.4 Tree Surgery/Felling

It is recommended that all tree work including any pruning is to be carried out prior to the start of construction. All tree works should be carried out in accordance with current industry best practice, BS3998:2010 Tree Work – Recommendations and should be undertaken by fully qualified competent contractors such as Arboricultural Association Approved Contractors.

All operations should be carefully carried out to avoid damage to the trees being worked on and adjacent trees. No trees to be retained shall be used for anchorage or winching purposes.

5.5 Tree Protection Fencing

It is recommended that tree protection fencing is used for existing retained trees to the extent of their RPAs as shown in the Tree Protection Plan (Appendix D) in order to protect the roots during any excavations or construction required.

As discussed in Section 3.2.3, RPA encroachment is expected for T16-T19. In order to accommodate for said works, tree protection fencing may be moved back when required (and should be moved only the required distance).

The tree protection fencing shall be erected prior to any of the following taking place:

- Plant and Material delivery,
- Soil stripping,
- Construction works,
- Utility installation,
- Landscaping.

When trees are near boundaries the RPA may extend into adjacent land, it is not necessary to install fencing on adjacent land unless this is being used for access.

Once installed, the barriers should be inspected by the Supervising Arboriculturist to ensure it is in the correct location and suitable for purpose. The fencing should also be inspected by the site supervisor on a regular basis, and any concerns should be raised with the supervising Arboriculturist.

The tree protection fencing should be suitable for purpose to protect the tree from vehicle and machinery damage throughout construction (no vehicle access within the Root Protection Areas is considered appropriate). An example of the type of tree protection fencing as recommended in BS5837:2012 is attached with this report (Figures 2 and 3). The fencing should have attached signs informing that access into these areas is not permitted without written authority from the supervising Arboriculturist.

5.6 Restrictions within the Tree Protection Areas

Works are proposed inside the RPAs of T16-T19. Any excavations within this area must be non-mechanical with handheld tools and greater attention to root protection. Inside these Tree Protection Areas the following shall apply;

- No mechanical excavation whatsoever.
- Excavation will include hand-digging or air-spade excavation where roots may be present only. Excavation is to occur under the supervision of the Supervising Arboriculturist.
- Any roots must be exposed carefully; all roots >25mm diameter must be retained where possible. If roots >25mm must be cut, this must only be done under arboricultural supervision and roots must be cut back to sound tissue with sharp tools (not ripped/fragmented). Roots must be covered immediately with damp hessian/polythene to prevent desiccation until backfilling.
- No lowering of the levels for any purposes.
- No storage of plant or materials.
- No storage or handling of any chemicals.
- No vehicular access within the RPAs is deemed to be appropriate, and no mechanical excavation within RPAs is to be undertaken. All materials and tools used within RPAs are to be taken in by a pedestrian hand operated plant.

5.7 Avoiding Damage to Retained Trees

Care should be taken to ensure no damage occurs to the retained trees throughout the development process.

Any pruning work should be carried out at the tree surgery stage in accordance with BS3998:2010 and done by suitably qualified specialist staff.

Special care will be required when using cranes to avoid contact with the canopies of the trees. Provision may be required for special measure if outriggers need to be used close to or within the RPA. Advice should be sought from the Supervising Arboriculturist.

5.8 Temporary Ground Protection within RPA's

Appendix D shows the proposed location of the tree protection fencing for retained trees (the extents of their RPAs). To allow access and space for construction the fence will, in certain places, need to be moved back. To ensure no damage occurs to the roots or soil, temporary ground protection measures will be used in the areas.

The type of ground protection required will depend on the size and weight of the equipment and machinery to be used. The temporary ground protection should be capable of supporting any traffic entering or using the site without being distorted or causing compaction of underlying soil. For example, as stated in BS 5837:2012;

- *'For pedestrian movements only, a single thickness of scaffold boards placed either on top of a driven scaffold frame, so as to form a suspended walkway, or on top of a compression-resistant layer (e.g. 100mm depth of woodchip), laid onto a geotextile membrane.*
- *For pedestrian-operated plant up to a gross weight of 2t, proprietary, interlinked ground protection boards placed on top of a compression-resistant layer (e.g. 150mm depth of woodchip), laid onto a geotextile membrane.*
- *For wheeled or tracked construction traffic exceeding 2t gross weight, an alternative system (e.g. proprietary systems or pre-cast reinforced concrete slabs) to an engineering specification designed in conjunction with arboricultural advice, to accommodate the likely loading to which it will be subjected.'*

The details of the type of temporary ground to be used should be included in the construction method statement.

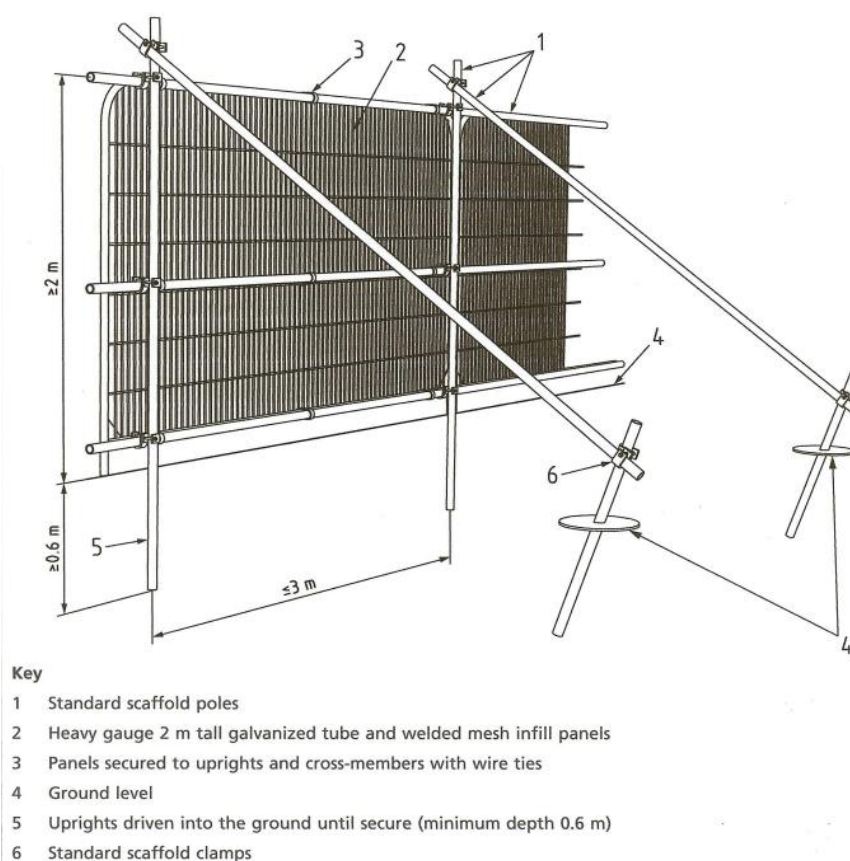


Figure 2 – Default specification for protective barriers.

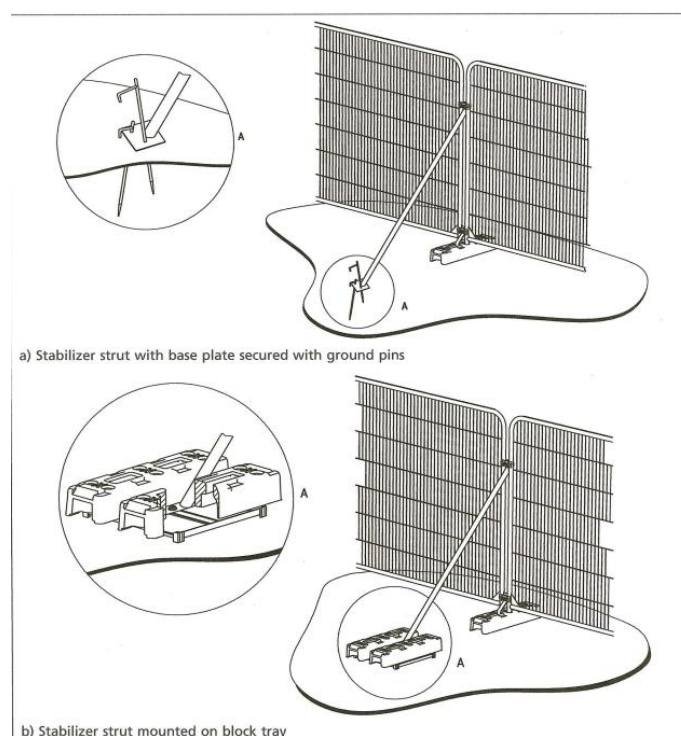


Figure 3 – Examples of Above-ground stabilising systems.

5.9 Foundations within Root Protection Areas

The proposed extension will necessitate foundation construction within the Root Protection Areas of T16-T19. Therefore, the excavation methodology outlined in Section 5.6 must be adhered to, with any resulting foundation design then being undertaken in a manner that will minimise root disturbance.

The following methodology has been prepared by the project structural engineer and outlines the specific foundation approach:

“Tree Protection During Construction: Foundation Design and Installation

Most tree damage during construction occurs below ground, making alternative foundation designs essential within Root Protection Areas (RPAs). Traditional foundations are unsuitable in these zones; instead, small-diameter screw piles are recommended as they can assist with minimising disturbance to existing roots. While some root damage is inevitable, reducing it as much as possible is critical for tree health. Screw piles have been selected as the optimal system for all construction within RPAs and will be installed in accordance with BS 5837:2012 “Trees in relation to design, demolition and construction – recommendations”, ensuring that trees and soil structure take priority.

Foundation Approach

After screw piling, a cap plate will be installed to support a ring beam set above ground level. This above ground beam will form the foundation for the new western block of Nicholson House, whilst limiting the requirement for significant below-ground disturbance within the site’s existing RPAs.

Equipment and Access

Heavy plant is not required for screw pile installation. A mini digger rig system will be used to install the piles to a predetermined torque, providing higher load capacities than a hand-held system, and reducing the number of piles and overall impact on trees. The mini digger rig system will start at the furthest pile location and will work backward out of the RPA using lightweight temporary protection matting. This matting assists with spreading the mini digger’s load and prevents ground churning during manoeuvring.

Supervision and Compliance

The Project Arboriculturist will attend site on the first day of piling to assess the installation method. If there is risk of unacceptable damage, work will stop until additional protective measures are implemented, and protection of RPAs is assured.

Typical Screw Pile Installation Process

- 1. Lay geotextile membrane and temporary protective matting to allow safe working within RPAs. Hand-dig pilot holes to check for roots; if a significant root (>25mm) is found, the pile position will be adjusted to avoid it.*
- 2. Move the mini digger carefully over the protective matting to the pile location. Install the pile, making angular adjustments before the second helix penetrates the ground. Continue to the required depth, avoiding vibration or disturbance. Repeat for each pile.*
- 3. Once piling is complete, remove all temporary matting and membranes carefully from the site, and attach pile caps ready for the installation of the above ground ring beam.”*

5.10 Appointed Clerk of Works (ACoW)

Arboricultural supervision will be undertaken by an appointed Arboricultural Clerk of Works (ACoW) for all operations taking place within the Root Protection Areas (RPAs) of retained trees. The ACoW will be an appropriately qualified and experienced arboricultural professional, holding at minimum:

- A Level 4 arboricultural qualification or higher (e.g., Level 4 Diploma, FdSc Arb, BSc Arb/Forestry),
- Professional membership of a recognised arboricultural body (e.g., Arboricultural Association or Institute of Chartered Foresters), and
- Demonstrable experience in supervising construction activities in proximity to retained trees under BS5837:2012.

The ACoW will oversee the following operations:

- Pre-commencement briefing to site contractors on tree protection requirements.
- Supervision of all excavation, ground reduction, or installation of foundations and services within RPAs.
- Inspection and approval of any exposed roots >25 mm prior to pruning.
- Verification that all tree protection measures remain in place and effective.

The ACoW will also maintain a supervision log and provide written records to the LPA at agreed stages, including:

- A pre-commencement report confirming the correct installation of tree protection measures,
- Supervision notes for each monitored activity within RPAs, including photographs and any required corrective actions, and
- A final compliance statement upon completion of works affecting RPAs.

Any non-compliance observed will be reported immediately to the client and, where relevant, the LPA, with recommended corrective measures. The ACoW will be appointed by the client prior to commencement of any site works. Details of the appointed ACoW, including credentials and contact information, will be provided to the LPA before any activity takes place within RPAs.

6 Conclusions

This report provides an assessment of the trees on and adjacent to the proposed development at Dorothy House Hospice Care, Winsley, Bradford on Avon, Wiltshire, BA15 2LE. BS5837 methodology was used in order to complete the survey and produce an Arboricultural Impact Assessment. A Tree Constraints Plan (TCP), showing the RPA zones, has also been produced (Appendix B) alongside a Tree Protection Plan (Appendix D).

Trees on-site and adjacent have been classed as BS8537 Category 'A' - 'U' due to their varying merit (Figure 3.1). Recommendations regarding tree works and monitoring/maintenance have been made in Section 4.2.1. It is understood that no tree removals are required to facilitate the proposals, meaning no mitigation planting is required.

Encroachment into the RPAs of T16-T19 is anticipated to occur, although, providing that excavations are carried out sensitively (adhering to measures set out in Section 5.6), works can proceed using a

tailored foundation design that protects any major roots discovered. The Arboricultural Method Statement (Section 5) should be adhered to throughout the development process in relation to tree protection measures and works within RPAs of T16-T19.

Crown conflicts for T16-T17 are also expected, as shown within the Tree Constraints Plan, but due to the minimal overlap and the large spread of the affected crowns, a pruning regime is considered sufficient to offset this conflict.

All work should adhere to RPA restrictions and with non-mechanical tools if nearby anticipated rooting areas of any retained trees in order to ensure existing ground levels remain unchanged. The overall advice for all retained trees is summarised below:

- Removal of all agreed trees and any agreed pruning works prior to works commencing by a suitably qualified arboricultural contractor.
- Induction of construction personnel regarding the exclusion of works (including access and storage) from the retained trees' RPAs.
- Secure temporary barrier fencing around the site to exclude the retained tree's crowns and RPAs from the working site.
- The storage of materials clear of all retained trees and conditions to ensure no contamination/run-off into soils in proximity to trees or on higher ground.
- For the removal of existing structures and/or hard surfaces from RPAs the works to be undertaken separate to construction, manually and sensitively.

Appendices

Appendix A: Site Plans

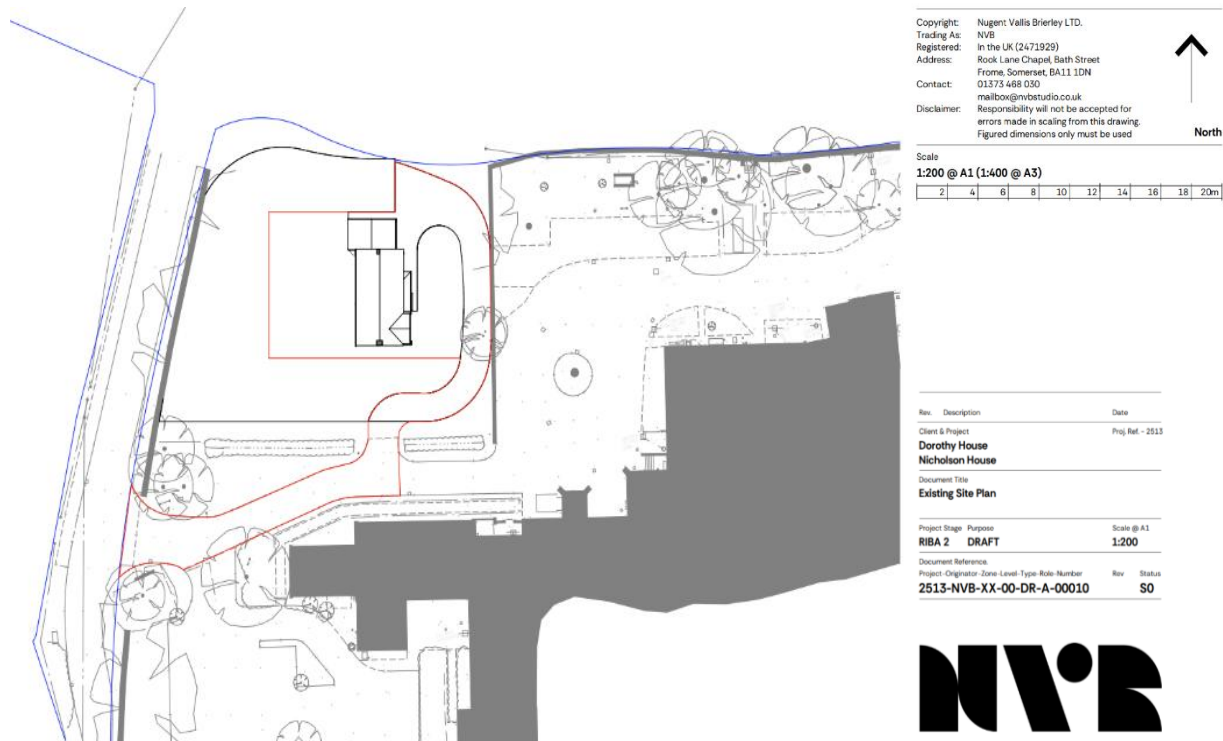
Appendix B: Tree Constraints Plan (TCP)

Appendix C: BS5837 Data Table

Appendix D: Tree Protection Plan

Appendix E: Planning Policy & Legislation

Appendix A: Site Plans



Existing Plans (Source: Client)



Proposed Plans (Source: Client)

Appendix B: Tree Constraints Plan (TCP)



Appendix C: BS5837 Data Table

Tree No.	Species	Height (m)	Single stem (S)/multi-stem (MS)?	Stem Circumference at BH (cm)	Height of Crown AGL (m)	BS5837 Class	Branch Spread	Age Class	Physio condition	Structural condition C = crown, B= basal, S= stem	Comments	Estimated useful life (yrs)	Root Protection Area (radius)
T1	Silver Birch (Betula pendula)	7m	S	85cm	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	FELLED IN 2ND SURVEY	40+ years	3.25
T2	Pear (Pyrus)	12m	S	105cm	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	FELLED IN 2ND SURVEY	40+ years	4.01
T3	Coppiced shrub	8m	N/A	N/A	0.5	N/A	N - I/A E - I/A S - 3 W - I/A	N/A	Good	C - good B - good S - good	N/A	N/A	Inaccessible
T4	Coppiced shrub	8m	N/A	N/A	0.5	N/A	N - I/A E - I/A S - 3 W - I/A	N/A	Good	C - good B - good S - good	N/A	N/A	Inaccessible
T5	Holly (Ilex aquifolium)	7m	S	45cm	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	1.72
T6	Ash (Fraxinus excelsior)	8m	S	40	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular	40+ years	1.53

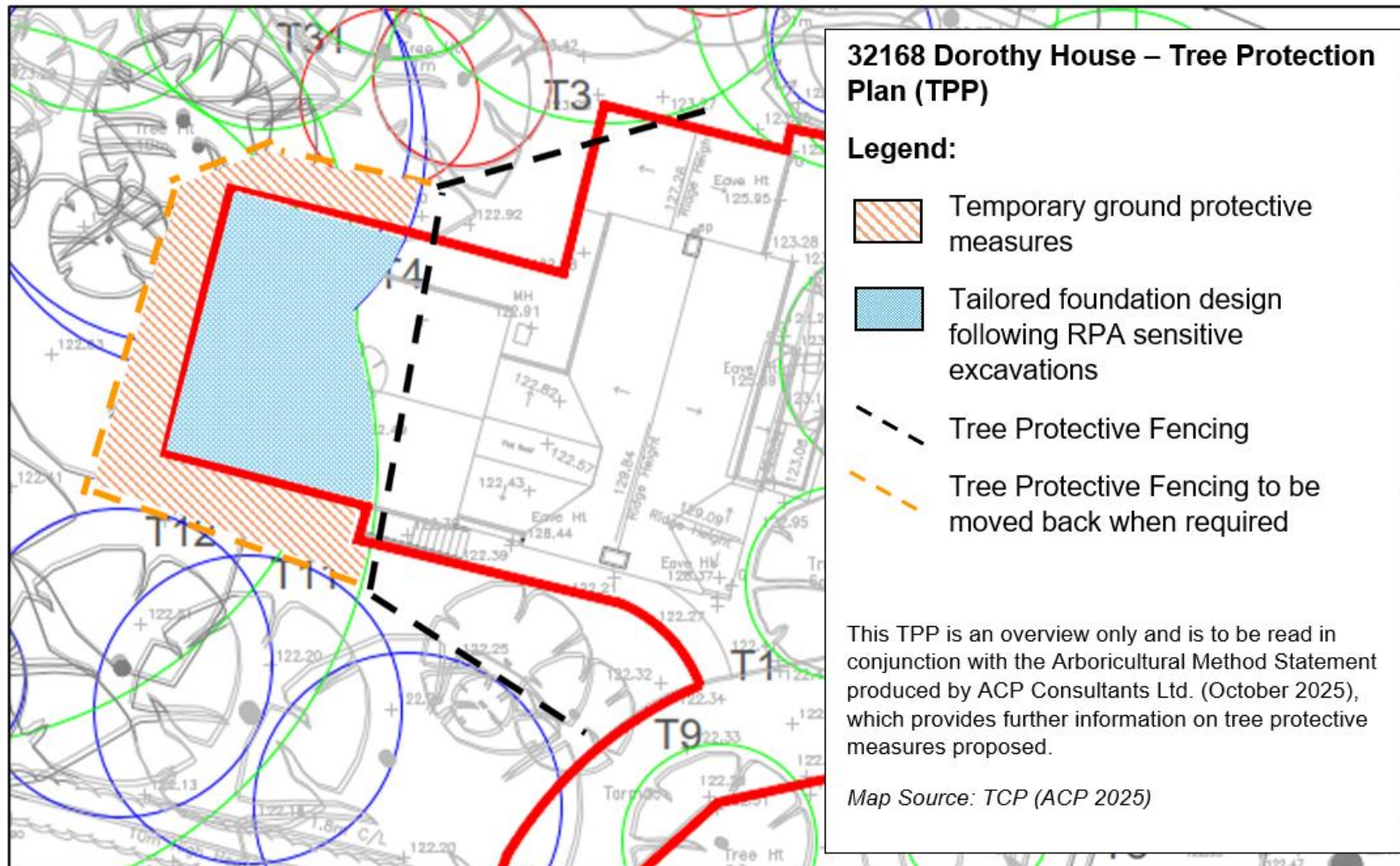
											monitoring should occur.		
T7	Sycamore (Acer pseudoplatanus)	9m	MS (2 stems)	75 75	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	3.38
T8	Cherry (Prunus avium)	7m	MS (2 stems)	70 32	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	2.45
T9	Cherry (Prunus avium)	6m	MS (2 stems)	90 50	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	3.28
T10	Cherry (Prunus avium)	11m	S	135	1.64	B	N – 0.5 E - 3 S – 3.5 W - 2	M	Good	C - good B - good S - lean	The tree has a slight lean that should be monitored. Ivy coverage also has the potential to conceal further defects.	20-40 years	5.16
T11	Yew (Taxus baccata)	12m	MS (8 stems over 75mm)	37, 40, 35, 35, 24, 14, 40, 50	4	B	N – 4.5 E – 3.5 S – 2.5 W - 2	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	20-40 years	3.78
T12	Yew (Taxus baccata)	11m	MS (9 stems)	0.8, 20, 80, 48, 48, 48, 20, 20, 20	3	B	N - 4 E – 1.5 S - 3	M	Good	C - good B - good S - good	Ivy coverage has the potential to	20-40 years	3.76

							W – 2.6				conceal defects. Paritally inaccessible		
T13	Yew (Taxus baccata)	5-10m	S	34	4	B	N – 0.5 E – 0.5 S – 0.5 W – 0.5	M	Good	C-good B-good S – lean toward south	Ivy coverage has the potential to conceal defects. The tree has a slight lean that should be monitored	20-40 years	1.32
T14	Yew (Taxus baccata)	10m	S	280	2	B	See Section 2.3	M	Good	C-good B-good S-good (ivy coverage)	Ivy coverage has the potential to conceal defects.	20-40 years	10.68
T15	Yew (Taxus baccata)	9m	S	160	1.5	B	N – 1.5 E - 1 S – I/A W - I/A	M	Good	C-good B-good S-good	Ivy coverage has the potential to conceal defects.	20-40 years	6.12
T16	Beech (Fagus sylvatica)	20m	S	300	9	A	N-2.5 E-12 S-2 W-I/A	M	Good	C-good B-good S-good	Currently in reasonable condition – regular monitoring should occur.	40+ years	15
T17	Beech (Fagus sylvatica)	18m	S	300	10	A	N-I/A E-7.5 S-I/A W-I/A	M	Good	C-good B-good S-good	Currently in reasonable condition – regular monitoring should occur.	40+ years	3
T18	Sycamore (Acer pseudoplatanus)	6m	S	50	1	B	N – 1.5 E - 4 S – 2.5	SM	Good	C - good B - good S - good	Currently in reasonable condition –	20-40 years	1.91

							W - 0				regular monitoring should occur.		
T19	Sycamore (Acer pseudoplatanus)	6m	S	50	1	B	N – I/A E - I/A S – I/A W – I/A	SM	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	20-40 years	1.91
T20	Holly (Ilex aquifolium)	10m	S	50	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	1.91
T21	Yew (Taxus baccata)	12m	S	130	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Currently in reasonable condition – regular monitoring should occur.	40+ years	4.97
T22	Yew (Taxus baccata)	12m	S	135	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	6.19
T23	Yew (Taxus baccata)	12m	S	140	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	6.19
T24	Sycamore (Acer pseudoplatanus)	9m	S	70	See Section 2.3	B	See Section 2.3	S/M	Good	C - good B - good S - good	The tree has a slight lean that should be monitored.	20-40 years	2.67
T25	Box (Buxus sempervirens)	9m	MS (2 stems)	50 80	See Section 2.3	C/U	See Section 2.3	M	Good	C - good B - good S - good	Dead tree.	<10 years	3

T26	Yew (Taxus baccata)	14m	S	190	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	7.26
T27	Yew (Taxus baccata)	7-15m	S	90	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	3.44
T28	Yew (Taxus baccata)	7-15m	S	75	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	2.86
T29	Yew (Taxus baccata)	7-15m	S	105	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	4.01
T30	Yew (Taxus baccata)	7-15m	I/A	I/A	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	Inaccessible
T31	Yew (Taxus baccata)	7-15m	S	115	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	4.39
T32	Yew (Taxus baccata)	7-15m	S	130	See Section 2.3	A	See Section 2.3	M	Good	C - good B - good S - good	Ivy coverage has the potential to conceal defects.	40+ years	4.97

Appendix D: Tree Protection Plan



Appendix E: Planning Policy & Legislation

This section summarises the relevant National and Local legislative and policy background, statutory and non-statutory guidelines relevant to the potential commercial development.

National Policy

National Planning Policy (December 2024)

The principal national planning policy guidance with respect to the potential development is the National Planning Policy Framework (NPPF). The most recent update of the NPPF was published in December 2024 by the Ministry of Housing, Communities and Local Government. This guidance sets out the Government's planning policies for England and how they are expected to be applied. Three dimensions to sustainable development have been identified in the NPPF: economic, social, and environmental.

The NPPF Section 187 states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."*

Section 188 states that:

"Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries."

Section 189 states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads⁶³. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."

Section 190 states that:

“When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁴ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

Section 192 states that:

“To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Section 193 states that:

“When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- 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 and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*

Section 194 states that:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

6.1.1 Relevant National Planning Practice Guidance (NPPG, 2016)

NPPG is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning.

The guidance note on 'Natural Environment' explains key issues in implementing policy to protect and enhance the natural environment, including local requirements. This has been referred to when preparing this report. It states that:

"Planning authorities need to consider the potential impacts of development on protected and priority species, and the scope to avoid or mitigate any impacts when considering site allocations or planning applications. Guidance on the law affecting Habitats Sites, protected species and SSSIs.

Natural England has issued standing advice on protected species. A protected species mitigation licence from Natural England may be required before any work can start."

The PPG also states that:

"Information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development (including site selection and design, pre-application consultation and the application itself). An ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate. Pre-application discussions can help to scope whether this is the case and, if so, the survey work required.

Even where an Environmental Impact Assessment is not needed, it might still be appropriate to undertake an ecological survey, for example, where protected species may be present or where biodiverse habitats may be lost.

As with other supporting information, local planning authorities should require ecological surveys only where clearly justified. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. Further guidance on information requirements is set out in making an application."

Biodiversity net gain is mentioned in the PPG and states that:

"The National Planning Policy Framework encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. It may help local authorities to meet their duty under Section 40 of the Natural Environment and Rural Communities Act 2006."

Species and Habitats Legislation

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidates all various amendments made to The Conservation (Natural Habitats & c.) Regulations 1994, in respect of England and Wales. The 1994 Regulations transposed the EC Habitats Directive 1992 (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) into national law.

Annexes I and II of the Habitats Directive list (respectively) habitats and species for which member states are required to establish and monitor SACs. The EC Birds Directive provides a similar network of sites (SPAs) for all rare or vulnerable species listed in Annex I and all regularly occurring migratory species, with particular focus on wetlands of international importance.

Together with SACs, SPAs form a network of pan-European protected areas known as 'NATURA 2000' sites.

The Habitats Regulations also make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade on the animals listed in Schedule 2, or pick, cut, uproot, destroy or trade in the plants listed in Schedule 4.

This legislation was amended in January 2021: The main changes to the 2017 Regulations are:

- “the creation of a national site network within the UK territory comprising the protected sites already designated under the Nature Directives, and any further sites designated under these Regulations
- the establishment of management objectives for the national site network (the ‘network objectives’)
- a duty for appropriate authorities to manage and where necessary adapt the national site network as a whole to achieve the network objectives
- an amended process for the designation of Special Areas of Conservation (SACs)
- arrangements for reporting on the implementation of the Regulations, given that the UK no longer provides reports to the European Commission
- arrangements replacing the European Commission’s functions with regard to the imperative reasons of overriding public interest (IROPI) test where a plan or project affects a priority habitat or species
- arrangements for amending the schedules to the Regulations and the annexes to the Nature Directives that apply to the UK.”

The Convention on Conservation of European Wildlife and Natural Habitats (Bern Convention 1979)

The Convention on Conservation of European Wildlife and Natural Habitats (Bern Convention 1979) aims to ensure conservation and protection of all wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to afford special protection to the most vulnerable or threatened species (including migratory species).

The Wildlife and Countryside Act 1981 (as amended) (WCA 1981)

The WCA is the primary UK mechanism for statutory site designation (Sites of Special Scientific Interest [SSSIs]) and the protection of individual species listed under Schedule 1,2,5 and 8 of the Act, each subject to varying levels of protection.

The Countryside and Rights of Way Act 2000

This legislation strengthens the provision of the 1981 WCA (as amended), both in respect of statutory sites such as SSSIs and protected species. It also places a statutory obligation on Local Authorities and other public bodies to further conservation of biodiversity in the exercise of their functions, thus providing a statutory basis to the Biodiversity Action Plan (BAP) process, which began in 1994. Section 74 of the Act lists the habitat types and species of principal importance in England. The UK Biodiversity action Plan has now been superseded by the ‘UK Post-2010 Biodiversity Framework’ (July 2012), however, many of the species and habitats in the UK and local BAPs have not been updated and are still considered relevant to date.

A Bill to amend the Countryside and Rights of Way Act 2000 to extend the right of public access to the countryside, including to woodlands, the Green Belt, waters and more grasslands; and for connected purposes is currently in second reading in the House of Commons (November 2022).

Local Policy – Wiltshire Council

Development proposals in Wiltshire must comply with the adopted Wiltshire Core Strategy. The following policies are of particular relevance to trees and development:

- Core Policy 50: Biodiversity and Geodiversity – requires development to protect and enhance biodiversity and geodiversity, including features such as trees, woodlands and hedgerows.
- Core Policy 51: Landscape – requires development to protect, conserve and where possible enhance landscape character, ensuring that natural features such as trees are retained and appropriately integrated into design.
- Core Policy 52: Green Infrastructure – seeks to retain and enhance existing green infrastructure, including trees, and secure long term management and connectivity.
- Core Policy 57: Ensuring High Quality Design and Place Shaping – requires development to integrate important natural features, including mature trees and hedgerows, into the overall design to reinforce local character and contribute to biodiversity.

These policies collectively require that trees of landscape, ecological or amenity value are retained and protected during development, that encroachment into root protection areas is minimised, and that appropriate mitigation, enhancement and long term management are secured where impacts are unavoidable.