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Sent: 17 March 2026 10:57:23 UTC+00:00
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Subject: DM/26/0073 - Response to tree officer comments

Hi Joseph,

Hope all is well. Thank you for forwarding the tree officers comments. I asked both our drainage and tree consultants to review the tree officer's email and together we have put together the below response which I hope is helpful.

Before we make any changes to the layout that may be required, we would like, in the first instance to provide you with more background to the drainage discharge point and secondly give more information on the methodology of installing the pipe within/under the ancient woodland. If we can we'd like to agree this in principal point before considering any changes to the layout that may be required, given the fundamental nature of this matter. We have also responded to concerns raised regarding air quality.

With regards to air quality the development would not result in a significant increase in traffic. The application is supported by an air quality assessment, which follows national and local policy and guidance with respect to methodology. It concludes that due to the low number of vehicle trips generated by the development, road traffic exhaust impacts were predicted to be not significant. The report is attached. As such air pollution does not pose a constraint to the development and there is not requirement to provide a larger buffer zone to the ancient woodland.

Attached is the TPP which shows the ancient woodland boundary and the 15m buffer to it. The ancient woodland is shown by the yellow hatched and the 15m buffer is pink hatched. I also attach the drainage strategy drawing. If Irene needs any further mapping please let us know but the line of the ancient woodland and the 15m buffer is clear from these. Every effort has been made to minimise intrusion into the ancient woodland and the buffer, with the only incursion, for the reasons set out below, being that of the surface water drain.

The rationale for the drainage strategy, with discharge to water course is set out below, together with the location of the discharge point. We did consider alternative options but for the reasons outlined below all other options were discounted:

The development site does not benefit from infiltration potential, and the topography of the site falls towards the watercourse, meaning that the natural hydraulic regime of the site is for surface water to drain eastwards and to the adjacent watercourse within the ancient woodland. To comply with the NPPF and the National Standards for SuDS and its drainage destination

hierarchy, and to maintain the existing hydraulic regime (from which the ancient woodland benefits), the most sustainable method of surface water discharge must be chosen and this is to direct surface water to the watercourse. Consequently, out falling in this direction represents not only the most technically feasible and environmentally responsible solution, but also the option mandated by current national policy, regulatory requirements, and best-practice SuDS design principles.

The drainage strategy and pipework layout has taken care not to route infrastructure through RPZ's. Elsewhere on the site there are no drainage infringements into RPZs the only incursion is the surface water outfall to the watercourse. The location of the surface water pipe through the ancient woodland to the watercourse was carefully considered, the route chosen being selected to target an existing gap and minimise impact in terms of mature trees/RPAs whilst working within the constraints of the drainage strategy with regards levels and topography etc.

The methodology proposed for outfall pipe utilises a non invasive installation technique (thrust-boring or horizontal direction drilling) in order to minimise impact within the ancient woodland. This puts the pipe in at depth so outside of the primary routing environment, utilising a fully planned and precise path that would avoid tree roots, allowing successful installation without affecting the ground cover, damaging tree roots or disturbing habitats. It is a proven technique to mitigate harm to sensitive environments such as ancient woodland. No man holes would be within the AW buffer.

The pipe through the buffer is 150mm dia. In terms of depth, the pipe is proposed to be inserted at circa 3.7m in depth at chamber S9 (outside the buffer zone) and will follow the angle of the slope within the woodland to exit at the watercourse, at 0.7m depth. At that installation depth the outfall pipe will not result in harm to the trees, will be significantly lower than the vital topsoils that make ancient woodland valuable, and will not interfere with the hydrology of those soils.

The method of the sub ground thrust boring is as follows. This would be undertaken by a specialist contractor such as:-

[Expert Directional Drilling Contractors - EPS Trenchless Installations](#)

1. Entry Pit / Launch Area

- Located outside woodland and buffer.
- A directional drilling rig launches the drill string into the ground at a shallow angle ($\approx 10-20^\circ$).
- Drilling fluid (bentonite slurry) is pumped through the drill rods to stabilize the borehole and carry cuttings back.

2. Pilot Bore Path

- A steerable drill head creates the initial pilot hole.
- The drill path curves downward beneath the woodland.

- Tracking equipment ensures the bore stays on alignment and grade.

3. Minimum Cover Under Woodland

- The bore passes well below the tree root zone to protect root systems, soil structure, and habitat.

4. Reaming (Hole Enlargement)

- After the pilot hole is drilled, reaming tools enlarge the bore to the required diameter.
- In this instance a 1500mm pipe is proposed.

5. Pipe Pullback

- The surface water drainage pipe (often HDPE or steel casing) is assembled at the exit side.
- The pipe is attached to the reamer and pulled back through the borehole.

6. Exit Pit / Reception Area

- Located on the opposite side of the woodland.
- The pipe emerges here and connects to the downstream drainage system.

Regarding the other points raised, I believe there is scope to give plots 31 and 39 a little more space to the RPAs with a slightly reworked layout, this may require the loss of some proposed landscaping and garaging but in principle could be achieved to address arb concerns.

We can also make the necessary changes to the landscape plans regarding proposed species to be planted.

If you could get back to me as soon as you are able on the drainage approach following further discussion with the tree officer that would be kind. We can then move on to considering the layout changes the urban designer has requested.

I wanted to flag that rerouting the road as the Council has indicated to the south of plots 24-30 would place it with the RPAs of trees/group 5, 8, 9 and 35, and as such I have some concerns with this approach. Inserting a pedestrian footpath as indicated to connect the road to the east of plot 39 and the road between plots 30 and 31 would also result in incursions into the RPAs of trees 9, (11) and 12. There is also a 4m level change between the road to the east of plots 39 and the road between plots 30 and 31 which together with the tree routing environment is going to make the insertion of any footpath (even on a no dig basis) challenging. We can however take this away to review and discuss this further with you, but I wanted to flag the likely possibility of arb impacts from the indicative drawing circulated.



Kind regards,

Rosie Baker
Planning Manager
(working hours Monday - Wednesday)

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