

From: campaigning@woodlandtrust.org.uk
To: [North Shropshire Reinforcement](#)
Cc: campaigning@woodlandtrust.org.uk
Subject: Woodland Trust written representation for the Reinforcement to the North Shropshire Electricity Distribution Network Development Consent Order application
Date: 29 March 2019 17:08:49
Attachments: [Woodland Trust representation for the Reinforcement to the North Shropshire Electricity Distribution Network.pdf](#)

Dear Sir/Madam,

Thank you for the opportunity to comment on the above consultation. Please find attached the Woodland Trust's comments.

If you wish to discuss any of the points raised, please do not hesitate to get in touch.

Kind regards,
Nicole Hillier

Nicole Hillier
Campaigner - Ancient Woodland

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Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
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BS1 6PN

29th March 2019

Dear Sir/Madam,

Reference: Reinforcement to the North Shropshire Distribution Network Representation

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Natural England's Standing Advice on veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are irreplaceable habitats with some or all of the following characteristics... A veteran tree may not be very old, but it has decay features, such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value.*"

The proposed development will impact on 18 trees displaying veteran characteristics along the overhead powerline route either through direct loss of specimens in order to facilitate construction or through damage to the root systems via encroachment of root protection areas (RPA). It is essential that no trees displaying ancient/veteran characteristics are lost or damaged as part of the project. Any loss of veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.

National Planning Policy

The National Planning Policy Framework, paragraph 175 states: "*When determining planning applications, local planning authorities should apply the following principles: 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 reasons⁵⁸ and a suitable compensation strategy exists;*"

Paragraph 5.32 of the National Policy Statement for National Networks states: "*Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration*

of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.”

Woodland Trust concerns

Due to the significant concentration of trees displaying veteran characteristics in the area, the potential veteran trees likely to be lost are providing key habitat for the often rare species that are associated with decaying wood habitat, aging bark and old root systems, such as saproxylic invertebrates and certain species of bats and birds. The larger the concentration of old trees in an area and the longer they have been present on site, the richer the variety of species you will find among them.

Trees are susceptible to change caused by construction/development activity. As outlined in “Trees in relation to design, demolition and construction, BS 5837:2012”, the British Standard for ensuring development works in harmony with trees, construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

In addition, the Trust has previously raised concerns with regards to Long Wood, an area of woodland visible on the 1st Edition OS maps. The Trust recommends that discussions with Natural England are undertaken before determination of this application, as ancient woodland is afforded protection in planning policy due to its recognition as an irreplaceable habitat whose loss cannot be compensated for.

Conclusion

In summary, unless all trees displaying veteran characteristics are retained and adequately protected with a RPA in line with Natural England’s Standing Advice of 15 times the diameter (or 5m beyond the canopy if that’s greater), the Trust will remain **strongly opposed** to the proposed project and considers the scheme in direct contravention of national planning policy due to the loss of irreplaceable habitats.

We hope our comments are of use to you, if you would like to get in touch with the Trust further to discuss any of the points raised please do not hesitate to do so.

Yours faithfully,

Nicole Hillier
Campaigner – Ancient Woodland