

The Planning Inspectorate  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

8<sup>th</sup> February 2021

Dear Mr Allen,

**Reference: M25 Junction 28 Improvements representation**

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 29,000 hectares (71,000 acres) and we have over 500,000 members and supporters.

**Veteran trees**

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 improvements to the M25 Junction 28 will result in potential impact to several veteran trees identified within the Arboricultural Impact Assessment [Reference: APP-063] either through direct loss of specimens in order to facilitate construction (T021A and T074) or through damage to the root systems via encroachment of root protection areas (RPA).

**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 reasons<sup>58</sup> 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**

The Woodland Trust is concerned about the potential impacts of construction on several veteran trees. Natural England's standing advice for ancient woodland and veteran trees states: "*Direct impacts of development on ancient woodland or ancient and veteran trees include:*

- *damaging or destroying all or part of them (including their soils, ground flora, or fungi)*
- *damaging roots and understorey (all the vegetation under the taller trees)*
- *damaging or compacting soil around the tree roots*
- *polluting the ground around them*
- *changing the water table or drainage of woodland or individual trees*
- *damaging archaeological features or heritage assets".*

Further to this: "*Nearby development can also have an indirect impact on ancient woodland or veteran trees and the species they support. These can include:*

- *breaking up or destroying connections between woodlands and veteran trees*
- *reducing the amount of semi-natural habitats next to ancient woodland and other habitats*
- *increasing the amount of pollution, including dust*
- *increasing disturbance to wildlife from additional traffic and visitors*
- *increasing light pollution*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *changing the landscape character of the area"*

It is essential that no trees displaying 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.

Trees are susceptible to changes 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. 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. However, Natural England's standing advice states that "*a buffer zone around an ancient or veteran tree should be **at least 15 times** larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter."*

In addition, the Trust notes that The Grove is an area of woodland that has been continuously present since at least the 1<sup>st</sup> Edition OS maps and contains ancient woodland indicator species such as Bluebell and Dog's Mercury [Reference: APP-059]. Therefore, 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, the Woodland Trust requests that all trees displaying veteran characteristics are retained and adequately protected with a Root Protection Area in line with Natural England's Standing Advice.

Until the above recommendations are implemented, the Trust will remain opposed to the proposed project and considers the scheme in direct contravention of national planning policy due to the loss and damage to 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 sincerely,

Nicole Hillier  
Campaigner – Woods under Threat