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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
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13th October 2021

Dear Matthew Shrigley,

Reference: A47 - A11 Thickthorn Junction written 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 scheme will result in the loss of two veteran oak trees recorded as T13 and T14 within the Arboricultural Impact Assessment Report [APP-085], alongside likely detrimental impact to a number of other veteran trees adjacent to the scheme boundary. Therefore, the Trust would like to lodge **an objection** to this development.

National planning policy and guidance

The National Planning Policy Framework, paragraph 180 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 reasons⁶³ and a suitable compensation strategy exists;*"

Paragraph 5.32 of the National Policy Statement for National Networks states: "*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."

Natural England's Standing Advice for protecting veteran trees is as follows: *"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."*

Impact of proposals

The following scheme will result in the direct loss of two veteran oak trees (T13 and T14), as well as the removal of several other mature trees of considerable size and/or displaying veteran features. In addition, the scheme will likely result in significant impact to the following trees:

- T1 is within close proximity to the proposed road infrastructure and will likely be subject to root damage during construction. The RPA of T1 has also been capped at 15 metres, so does not fully account for the root spread of the veteran tree.
- T2 is also within close proximity to the proposed road infrastructure, which could result in root damage during construction.
- T5 and T6 will be subject to root encroachment during construction of the proposed road, which could result in root damage. The RPA of T5 has also been capped at 15 metres, so does not fully account for the root spread of the veteran tree.

It is **essential** that no trees displaying ancient/veteran characteristics are lost as part of the development. 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.

We also note that Cantley Wood (grid reference: TG18290488) is referred to as potentially unmapped ancient woodland within the Botanical Survey Report [APP-087]. Natural England's opinion on the antiquity of this site should be sought, to ensure ancient woodland is appropriately considered as part of the Examination Process.

Conclusion

In summary, the Woodland Trust requests that all veteran trees are retained and afforded a Root Protection Area (RPA) in line with Natural England's Standing Advice, and further investigation into the potential ancient woodland status of Cantley Wood is explored.

The Trust will remain opposed to the proposed project unless the scheme is revised to address our concerns. We consider the scheme is currently 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