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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
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15th February 2022

Dear Robert Jackson,

Reference: A47 Wansford to Sutton 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 over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the application to the Planning Inspectorate.

The proposed scheme will result in the loss of a veteran oak tree recorded as T20 within the Arboricultural Impact Assessment report [APP-096]. Therefore, the Trust would like to lodge **an objection** to this development.

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 also irreplaceable habitats.*

A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value."

National planning policy

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.*"

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;”*

Impact of proposals

The following scheme will result in the direct loss of a veteran oak tree (T20) to facilitate the new carriageway. Natural England’s standing advice for ancient woodland and veteran trees states: *“Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:*

- *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*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*
- *damaging archaeological features or heritage assets”*

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.

Natural England’s standing advice for protecting veteran trees is as follows: *“For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.”* The Trust requests that the applicants retain T20 and provide a suitable buffer zone as befitting a veteran specimen.

Conclusion

In summary, the Woodland Trust requests that veteran tree T20 is retained and afforded a Root Protection Area (RPA) in line with Natural England’s standing advice.

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