Northumberland Wildlife Trust

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Application by National Highways for an Order granting Development Consent to authorise the widening of an approximately 20.6km stretch of the existing A1 from Morpeth to Ellingham, with approximately 14.5km of online widening and approximately 6.1km of new offline highway

Thank you for consulting with Northumberland Wildlife Trust (NWT). Apologies for my short response and lack of knowledge of previous documents, as I have just received this consultation due to staff changes. Whilst NWT do not object to the proposals, and understand that a vast amount of work has already gone into or is proposed for the application, we have some concerns with the details of mitigation offered and whether a detailed LEMP will be provided. In addition to our previous correspondence, we have the following comments on the documents provided in the link:

Biodiversity Air Quality Assessment
NWT would advise that although Local Wildlife Sites (LWS) use the term 'Local' as advised by national guidelines, the site selection criteria are developed for a County level and quite often the features of interest can be of national importance. The Assessment states the following: 8.1.51 *Coquet River Felton Park LWS - The survey recorded a greater number of ancient woodland indicator species within the LWS when compared to the SSSI, implying that the environmental conditions of the LWS are in a similar, if not better, condition when compared to the SSSI.* However, the assessment still concludes in section 8.1.65. *In accordance with Table 3.13 of LA 108, as a Major adverse impact on a resource of Local importance, the Scheme would result in a Slight adverse (not significant) effect to the Coquet River Felton Park LWS as a result of operational air quality*. The current Ancient Woodland Inventory is incomplete and being updated, with this in mind and the level of ancient woodland indicator species found NWT would argue that this LWS should be assessed in line with the SSSI.

Poplar is particularly effective at removing atmospheric ammonia (Tang et al., 2022; CEH, n.d.). Native aspen may be considered as part of the planting scheme, possibly as a replacement, in appropriate locations, for the non-native species listed in the proposed mixes.

Veteran Trees
7.1.18. *Significant effects are predicted to an additional eight veteran trees within the updated 2024 assessment (T457, T681, T684, T690, 68872, 68541, 133031 and 132902). The Applicant commits to planting a further 240 trees (a ratio of 1:30 for the additional eight veteran trees) A1 in Northumberland: Morpeth to Ellingham Updated Biodiversity Air Quality Assessment Updated Biodiversity Air Quality Assessment Page 28 of 93 March 2024 within the Order Limits or adjacent land within their ownership. This may include, but would not be restricted to, the soft estate along the de-trunked section of the A1 (Part A). The locations of the trees would be informed by a suitably experienced ecologist, with the secondary aim of also providing connectivity for wildlife. The proposed additional planting is considered adequate to compensate for the significant effects to the additional eight veteran trees*. Although some of the veteran trees are non-native or not locally native, NWT would request that replacement trees are locally native species, and that these, plus their location are agreed with NCC's Ecology Team.

Proposed compensation includes (within certain sites) - *7.1.15. The habitat improvements would comprise invasive/non-native species removal, management to encourage the development of an*

understorey, selective thinning followed by understorey planting with ancient woodland typical species and subsequent management for the establishment period (5 years post-planting). The habitat improvements are to be secured by a legal agreement to be signed by both the Applicant and Northumberland County Council (NCC). NWT are somewhat satisfied with this condition, as long as species used are locally native, not just UK native; appropriate to the woodland type; planted in a low density, non-modular, naturalised layout and are agreed by NCC's Ecology Team.

NWT welcomes the proposed salvage techniques that will be undertaken, where possible, to take substrate and flora from the ancient woodland donor site to the receptor area of the Woodland Creation, mentioned within the CEMP.

For the Ancient Woodlands, an irreplaceable habitat, in general the conclusion is that the Scheme would result in a permanent/irreversible impact that may negatively impact the key characteristics of the resource and therefore the impact is classified as **Major adverse**. We would encourage the compensation scheme to reach further and include privately owned ancient woodlands, where landowners can be confirmed and agree to a management plan for enhancement. Inclusion of monitoring of this compensation, in a LEMP, is vital to assess the success and appropriateness, to allow for alterations to management and inform future schemes.

NWT would request that all veteran trees and older trees with cavities, marked for removal, are surveyed for bats. This is mentioned in the CEMP, but assuming felling happens outside the bird breeding season and depending on timing, there may be a requirement for full investigation of individual suitable tree cavities for hibernating bats, rather than just dusk/dawn surveys, before soft felling can occur. No more trees should be felled than those listed within the detailed plan.

NWT would always request that all species used in the landscaping (for all habitats) be appropriate locally native species, not just UK native, and that hedgerows are species rich with 8 or more species. The ancient woodland species mix proposed on the landscaping plan (available through the link) includes horse chestnut, which is **not** native and beech which is not locally native and introduced to Northumberland. We would request that these two species be removed, if not already and a more appropriate species be used. In the indicative woodland block planting mix, beech and large-leaved lime are listed. Again, these species are not locally native and we would request that these species be removed from the list. While beech is a UK native, it will out compete and shade out locally native species, while the heavy and persistent leaf litter will smother groundflora and greatly reduce natural regeneration and biodiversity. Considering the amount of work that has gone into the proposals, this is a minor alteration and by including more appropriate species there should be positive impacts rather than negative impacts.

Updated Outline Construction Environmental Management Plan
The plan currently outlines many best practice methods with regards to reducing or preventing impacts on biodiversity. NWT would request that detailed lighting, drainage/water quality and biosecurity plans for the construction phase are agreed, with the County Ecology Team, as well as relevant statutory bodies, to prevent impacts on nature conservation. We would request an ECoW should be present for any vegetation clearance, where a protected species may be impacted upon, including removal of large areas of dense vegetation, such as bramble, in case of the presence of outlier setts, for example. Any outstanding details need to be agreed before commencement of works. Any unexpected emergency

works that may need to take place during the construction phase, which may impact on ecological receptors, should have an ECoW present.

Any temporary diversions of PRoWs should be discussed with NCC Ecology Team, before progressing, to assess potential impacts on sensitive ecological receptors.

NWT welcomes the re-use of resources/materials where possible.

We also welcome the inclusion of otter/badger exclusion fencing, with lifetime maintenance, and suitable underpasses/culverts with mammal ledges. As well as Species Protection Plans for badgers and red squirrel, NWT support the inclusion of white-clawed crayfish measures.

The inclusion of grassed detention basins, swales and reed beds is also a more sustainable and welcomed approach.

Hedgerow removal
NWT would request that any hedgerow removal does not commence until after the bird breeding season and that care is taken with regard to species that may use the habitat for shelter, such as hedgehogs. All hedges should be replaced with species-rich, locally native hedges. Hedgerow planting should be greater than the length of hedgerow lost due to the development. Space for the hedges to mature fully, with a width of 3-5m, and management for wildlife should be the main priority.

Having not seen the previous documents I have to assume that the pre-construction Protected Species Survey protocols, Landscape Mitigation Plan and the production of a LEMP have been or will be agreed with Northumberland County Council and appropriate statutory bodies. Although, many details are proposed within the CEMP, NWT believe it will be clearer if these details are laid out within a separate LEMP that will continue after the construction phase. The LEMP should include complete species lists for all habitat creation, management/maintenance (including habitats, features such as boxes, badger fencing and mammal ledges) and monitoring of all biodiversity enhancement and mitigation.

Thank you again for consulting with Northumberland Wildlife Trust.

Kind regards,

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