



Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Telephone
01476 581111

Facsimile
01476 590808

Website
woodlandtrust.org.uk

Dear Sir/Madam,

Reference: A66 Northern Trans-Pennine Project

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 our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees.

We would like to take this opportunity to express **our serious concerns** regarding potential impact to woods and trees from the A66 Northern Trans-Pennine Project. Of particular concern to us is the applicant's decision to not undertake an Arboricultural Impact Assessment as part of their Development Consent Order application. For further information on our wider position on this proposal, our written representation can be found on the National Infrastructure Planning website¹.

Woodland Trust Concerns

An Arboricultural Impact Assessment (AIA) is an important document for any planning application where woods and trees are likely to be affected by development, as it provides evidence that the applicant has appropriately considered and protected trees and – where necessary – sought to ensure that their loss or harm is compensated for.

Therefore, the lack of such a report at the examination stage for the A66 Northern Trans-Pennine Project does not allow relevant interested parties and statutory bodies to accurately scrutinise the impact of the proposals on trees and woods, or ensure that important trees (such as ancient/veteran trees and trees protected by a Tree Preservation Order) have been adequately protected.

We acknowledge that the applicant has provided a Tree Loss and Compensation Planting Plan at the request of the Examining Authority during Issue Specific Hearing 2 (1st December 2022). However, this document does not provide an indication of the likely impact to trees and their roots which border the DCO boundary and therefore, it is not possible to make an accurate assessment of the number of trees and woods that would be directly and indirectly affected by the project. The applicants have stated that a targeted AIA will be submitted as

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010062/TR010062-001204-Woodland%20Trust-%20Deadline%201%20Submission.pdf>

part of the post-consent detailed design stages. However, there is limited opportunity for interested parties to outline their concerns and submit comments at this stage of the DCO process.

More broadly, we are concerned that National Highway's new approach to applying for development consent will result in a reduction in the level of arboricultural information provided upfront across their projects, which could result in a damaging precedent when looking ahead to the third Road Investment Strategy (RIS3). In recent times, we have been involved in and scrutinised a number of other large road schemes that would have significant impact on trees, such as the A417 Missing Link and the Lower Thames Crossing, and as part of those projects we have had the opportunity to examine and review AIAs. Such documentation has been undeniably important in ascertaining impacts on trees from these other large projects.

Conclusion

We therefore consider that it would be unreasonable for National Highways to not provide an AIA to support the A66 Northern Trans-Pennine project. In the interests of transparency and appropriate scrutiny of the A66 Northern Trans-Pennine project, we request that an Arboricultural Impact Assessment is provided by the applicant in full, prior to any decision being taken by the Secretary of State on this project.

Yours sincerely,

Jack Taylor
Programme Lead – Woods Under Threat
Woods Under Threat Team