



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

14th November 2019

Dear Mr Allen,

Reference: Southampton to London Pipeline Project representation

As the UK's leading woodland conservation charity, the 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 and we have 500,000 members and supporters.

Ancient Woodland

Natural England¹ defines ancient woodland *"as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] has been wooded continuously since at least 1600AD."*

It includes: *"Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration*

Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"

Both ASNW and PAWS woodland are given equal protection in the National Planning Policy Framework (NPPF) regardless of the woodland's condition.

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 development is likely to impact on numerous areas of ancient woodland designated on Natural England's Ancient Woodland Inventory that border the proposed pipeline route. The route will also result in impact to four veteran trees recorded on the Ancient Tree Inventory (197352, 197341, 193108, and 193090) either through direct loss of

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¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

specimens in order to facilitate construction 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 reasons⁵⁸ 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 areas of ancient woodland and veteran trees. Please see the attached table outlining the woodlands of concern below.

Natural England’s standing advice for ancient woodland states: *“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 also essential that no trees displaying ancient/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 change caused by construction 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 following construction. 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.

Conclusion

In summary, the Woodland Trust requests that all areas of ancient woodland should be afforded an appropriate buffer of 20m in line with Natural England's standing advice which states: "*you should have a buffer zone of **at least 15 metres** to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, **you're likely to need a larger buffer zone**. For example, the effect of air pollution from development that results in a significant increase in traffic.*"

Furthermore, the Trust also requests that all trees displaying veteran characteristics are retained and adequately protected with a RPA in line with Natural England's Standing Advice of 15 times the diameter (or 5 metres beyond the canopy if that's greater).

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

Appendix 1: Ancient Woodlands impacted by the proposed route

Name of Woodland	Designation	Grid reference
Unnamed woodland	PAWS	SU5797222400
Joan's Acre Wood	ASNW and PAWS	SU6132225707
Hughes Copse	PAWS	SU6960035230
Noar Copse	ASNW	SU7068536086
Holm Wood	ASNW	SU7136636473
Lawn Copse	ASNW	SU8051648552
Skains Copse/Coombe Wood	ASNW	SU8076249816
Skains Copse/Coombe Wood	ASNW	SU8093149788
Greendane Copse	PAWS	SU8211651449
Unnamed woodland	ASNW	TQ0194565374
Halebourne Copse	ASNW	SU9499162567