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The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
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1st April 2021

Dear Mr Gleeson,

Reference: A1 in Northumberland - Morpeth to Ellingham

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.

The proposed scheme will result in the direct loss of Dukes Bank Wood, designated as ancient semi-natural woodland (ASNW) on Natural England's Ancient Woodland Inventory and forms part of the River Coquet and Coquet Valley Woodlands SSSI. A second area of potential ancient woodland, known as Coquet River Felton Park LWS (grid reference: NZ17469989), has been identified within the application documents as also being directly affected by the proposal.

Furthermore, a number of ancient and veteran trees - as identified in the Arboricultural Report – will be felled to facilitate the scheme.

Ancient Woodland

Natural England[1] 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*"

Ancient and Veteran Trees

Natural England's standing advice on ancient 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 eith some or all of the following characteristics… Its: great age, size, condition, biodiversity value*

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

as a result of significant wood decay and the habitat created from the ageing process, cultural and heritage value."

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."*

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 reasons[58] 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

Whilst the Trust acknowledges that Dukes Bank Wood and Coquet River Felton Park LWS border the existing A1 motorway, the proposed new road bridges will result in further direct loss to these irreplaceable habitats. Natural England has identified the direct impacts of development on ancient woodland or veteran trees including:

- *"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 around the tree roots*
- *polluting the ground around them*
- *changing the water table or drainage of woodland or individual trees*
- *damaging archaeological features or heritage assets"*

Additional impacts to the woodlands will include soil compaction from the use of heavy machinery to facilitate the bridge construction. As such, the Trust requests that all works are kept outside of the ancient woodland where possible, to limit the impacts to delicate ground flora.

Furthermore, the Trust is concerned that for the remaining woodland, there will be additional impacts of increased noise and light pollution from traffic, as well as dust pollution during construction of the proposal. The woodland will also be subjected to increased nitrogen oxide

emissions from vehicles, which can change the character of woodland vegetation (in terms of species composition) through altering nutrient conditions[2].

Impacts to ancient/veteran trees

The following trees have been identified for removal within the Arboricultural Report accompanying this application:

- T91 – Veteran Ash
- T494 – Veteran Oak
- T682 – Veteran Ash
- T685 – Veteran Sycamore
- T688 – Veteran Oak
- T690 – Ancient Oak
- G21 – Over-mature Hawthorn group with veteran qualities

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 a number of notable trees will be felled to facilitate the proposed scheme. Any notable trees should also be retained wherever possible.

Other matters

As outlined in our relevant representation to this scheme, we acknowledge that the applicant is proposing compensation planting at a ratio of 12:1. However, we believe that the level of compensation needs to be commensurate with the irreplaceable nature of the habitat lost and therefore ask that the applicant adopts a ratio of 30 hectares of new planting for every one hectare of ancient woodland lost.

We are also concerned about the translocation of ancient woodland soils for new areas of planting as we understand that invasive species such as Himalayan Balsam are present in the area and any translocation process could aid the spread of such species.

Conclusion

In summary, whilst ancient woods and trees will suffer direct loss to facilitate the scheme, the Trust will remain **strongly opposed** to the proposed project and considers that the scheme goes against national planning policy designed to protect against the loss of irreplaceable habitats.

We hope our comments are of use to you, but 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,

[redacted]
Campaigner – Woods under Threat

[2] Sheate, W. R. & Taylor, R. M. (1990) The effect of motorway development on adjacent woodland. Journal of Environmental Management, 31, pp. 261-267