

FERN Submissions for 2 June 2021

Supporting Submission No 20026497

4. Trees & Woodland in the vicinity of the proposed Two Village Bypass

INTRODUCTION

This representation by Sarah Green is made on behalf of FERN (Farnham Environment Residents & Neighbours association). I am a Kew Dip. (Hons) horticulturist with 25 years of experience. I have written this report to document the trees and woodland that exist next to EDF's proposed bypass route and to highlight major issues of concern.

A major issue of concern is the fact that the environment in and around the Farnham Hall Estate is the beating heart of local biodiversity. These habitats, already under pressure from climate change, should be protected. So why have natural assets adjacent to EDF's bypass route not been assessed for the DCO? That failure means that the ExA are not being given the necessary information on which to come to a balanced planning judgement.

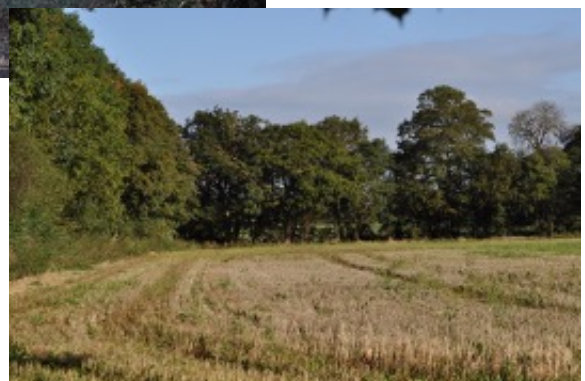
There is woeful under-reporting and mis-reporting by EDF on ancient trees and EDF has completely misunderstood the significance and importance of the double hedgerow running the length of the access lane between the Farnham Hall area and Foxburrow Wood, an important landscape consideration in itself but also an important wildlife corridor, and especially so for bats.

We still have no adequate hydrological study being openly disclosed as to the potential impact of such a deep cutting on the hydrology of the whole area but relating in particular to the Ancient Woodland at Foxburrow Wood, and also bearing in mind the AW at Pond Wood. Nuttery Belt was ignored with another 'access not granted' explanation, when it is known to have AW indicators.

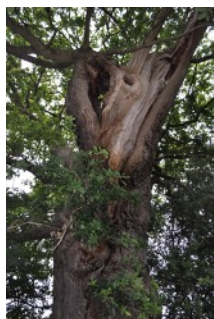
Abbreviations: "CWS" County Wildlife Site, "AW" Ancient Woodland, "SCC" Suffolk County Council, "ESC" East Suffolk Council, St. Andrew & Farnham Parish Council "LPC", "WC" Wildlife Corridor, "ATI" Ancient Tree Inventory

1 LISTED TREES

Pics: EDF are proposing to remove 120m of ancient double hedgerow containing some of the listed trees they will destroy, none of which are properly acknowledged. This double hedge connects directly to Foxburrow Wood as shown and is an important bat wildlife corridor.



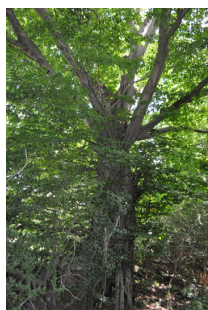
Corrections to DCO on Listed Trees information
sourced from the Ancient Tree Inventory Woodland



The DCO states tree 98 is an oak DBH 150cm with high value when it is actually a Listed Ancient oak with a Girth of 500cm of high value that EDF would be felling.



The DCO states tree 97 is an oak DBH 120cm with high value when it is actually a Listed Veteran oak of high value with a Girth of 450cm that EDF would be felling.



The DCO states tree 118 is Elm, mature DBH: 115cm of low potential when it is actually is a Listed Ancient Hornbeam with Girth of 400cm with high potential. It is in the ancient hedgerow between Pond & Foxburrow Wood so very close to EDF's workings and may be under threat.



The DCO states tree 119 is a pedunculate oak DBH 200cm with moderate potential when it is a Listed Veteran Oak with a Girth of 500cm of high potential that EDF would be felling.



The DCO states tree 120 is a mature Ash DBH 115cm with low potential when it is actually a Notable Oak with a girth of 400cm of high potential that EDF would be felling.

Other important trees in the double hedgerow that are incorrectly identified:

- The DCO states tree 121 is a mature Ash DBH: 30cm with moderate potential when it is a Listed Notable Oak with a Girth of 370cm that goes unrecorded
- The DCO states 122 is a mature Ash DBH: 85cm with moderate potential when it is a Listed Veteran Ash of high potential with a Girth of 350cm that goes unrecorded
- Completely overlooked is a Listed Veteran sycamore pollard with a Girth of 400cm

2 GROVE OF ANCIENT/VETERAN OAK POLLARDS THAT WERE NOT MENTIONED BY EDF, 140M DISTANCE FROM EDF'S PROPOSED SITE. HOME TO BATS, BARN/TAWNY/LITTLE OWLS, KESTRELS, SPARROW HAWKS, BUZZARDS, WOODPECKER AND MANY SPECIES OF INSECTS, MAMMALS AND FUNGI.



3 HARMFUL EFFECTS ON “AW” BY NOT REPORTING CLEARLY ON HYDROLOGY EFFECTS OF ITS BYPASS ON THE ADJACENT AW/CWS Foxburrow Wood & Pond Wood

Picture below: the sunny, western edge of Foxburrow Wood is an important part of habitat connectivity as it faces habitats at Farnham Hall Environs, yet there is a new footpath running under 10m distance from its length, plus overbridge and ramp workings calculated by EDF as within 15m. The picture shows one of its oaks on this western side with acute oak decline, another large oak branch on this side collapsed last summer with a resounding crash. Given the tight fit and how much is being squeezed into this area EDF have not properly assessed the consequences to this AW on wildlife connectivity, preservation of AW and planning requirements. On hydrology alone the standing advice for AW is:

- you must avoid drainage schemes unless they protect root areas
- any change to the water table does not adversely affect ancient woodland

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



'Our native oaks are under pressure like never before, declining at an unprecedented rate due to drought, flooding, pollution, pests and diseases. Called acute oak decline it is caused by a combination of factors which cause oaks trees to become stressed by environmental stresses then insects, fungi and bacteria move in on the vulnerable tree and push it into decline.' Excerpt: <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/tree-pests-and-diseases/key-tree-pests-and-diseases/acute-oak-decline/>



Left: Along the northern edge of Foxburrow Wood the farmer has recently dug a 3m deep trench alongside its length, removing a considerable amount of the AW. If EDF's proposal were to go ahead it would mean the Ancient Woodland would have another, but deeper cutting on its Western flank. Undermining this AW on both its northern and western flanks.

Despite SCC's and ESC's reservations of the hydrology implications of EDF's cutting running alongside Foxburrow Wood, they were disinterested when I reported the farmer's new trench. An email from ESC dated Jan 2021 said: *'I cannot comment on the farmers maintenance work, he is entitled to ensure his land is appropriately drained if he owns it'*.

In their investigations EDF did dig 2 boreholes adjacent to the western edge of Foxburrow Wood and took periodic readings. We presumed they were looking at the effect of hydrology on the AW Foxburrow Wood, because of concerns ESC and SCC have shared in their representations. When we recently asked EDF for their hydrology reports (documents being redacted on the PINS website), they however confirmed the boreholes were nothing to do with woodland and about the effect of hydrology on their road.

SCC and ESC have not demanded, it seems, any proper hydrological studies for EDF's alignment. No surveys we know of have taken into account the additional trenching work that has now been done on the northern side of Foxburrow Wood and the additional pressure this will cause on the wood.

4 POND WOOD AW/CWS

The bypass runs in close proximity to Pond Wood, 40m away in part and in a cutting. We could only find one inaccurate description in the DCO of Pond Wood: 'vol 5 chapter 7, appendix 7a: annex 7a.3 primary data 7. Pond Wood is a broadleaved semi-natural woodland with a canopy of field maple, oak and beech and an understory of field maple, hazel and elder.' The owner was never contacted by EDF to undertake a survey of the wood or its ponds.

A correct survey of Pond wood can be found in its CWS citation which confirms that it is both AW & a "CWS" with a canopy dominated by ash and field maple with occasional oak and beech. Ash was once one of the most widespread tree species in Europe and is now threatened by ash dieback. It is a IUCN Red Listed Tree. The Woodland Trust's website says: 'Ash dieback will kill around 80% of ash trees across the UK, at a cost of billions, from the practical expense of clearing up the dead and dying trees to the loss of environmental air purification, the effects will be staggering. Yet some trees are showing a tolerance. One of the protections is to retain as many potentially tolerant ash trees as possible, letting diseased trees decline naturally which contributes to resilience of other ash trees. Ash dieback will change the landscape forever and threaten many species which rely on ash.'

The ash trees in Pond Wood are naturally occurring and currently have especially low rates of Ash dieback. They are part of a Royal Botanic Gardens Kew Research & Conservation project, who are assessing the Ash trees in Pond Wood and will be taking samples from suitable trees. *'Species rich habitats in the UK have been destroyed, degraded and fragmented at an alarming rate. Many also now face pressure from climate change and invasive pests and diseases. In response, the government and conservation agencies are working together to expand and link surviving habitats and create a resilient ecological network. Achieving this vision depends on the availability of a diverse range of high quality, UK native-origin seed for research and conservation activities. RBG Kew is working to increase the diversity of UK native plant species that are collected, seed banked and made available for wider use. This priceless collection will serve as a back-up in case these species are lost in the landscape. It will also provide seed material for current research needs such as testing for disease resistance and increasing our understanding of the biology and ecology of UK plant species.'* Millennium Seed Bank Partnership, Royal Botanic Gardens, Kew.

The cursory assessment of Pond Wood is another sad example of the gross lack of care EDF have shown for rare habitats.

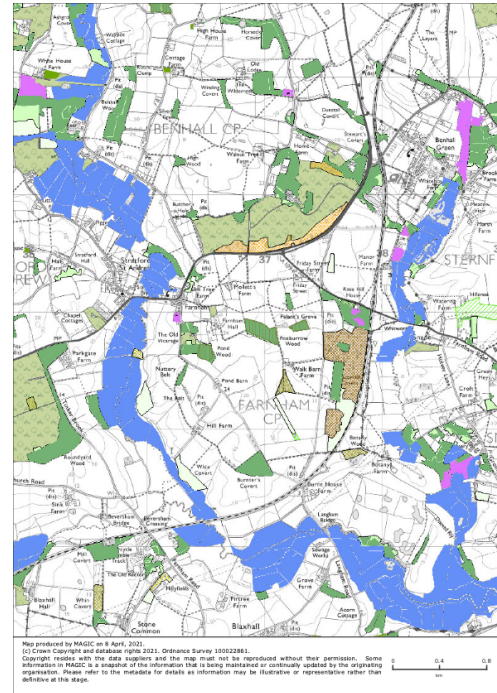
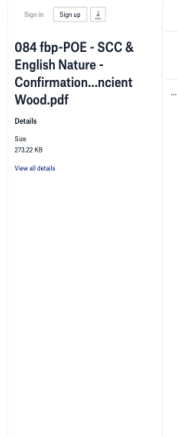
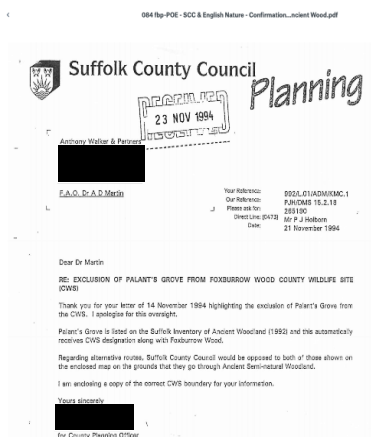


Left Picture: One of the ponds in Pond Wood showing through the trees how close it is to EDF's alignment. Below Picture: Distant view of the eastern side of Pond Wood with Ancient double hedgerow on the right hand side.



Over the months SCC/ESC have come up with a number of reasons why the EDF route is the 'least worse' option; most have disappeared along the way and there has been a conspicuous failure to consider other aspects, such as ecology and heritage . The most recent are: the alternative route would go through ancient woodland, then it became because it would go through CWS and then that the woodland was simply contiguous.

- The alternative route would not result in any loss of ancient woodland. It is no longer designated as such on Defra's magic maps. It is a thin strip of denuded scrub (see pictures below).
- This area was automatically given CWS status when it was incorrectly designated as AW (see letter from SCC below"). We are not aware of any study to confirm that it should still be CWS
- Historically there was a roadway running north/south which is now only a wide footpath (picture bottom right). Scrub trees growth has been allowed to occur since 1803.



5 CONCLUSION

The SE part of Farnham that comprises the settlement around Farnham Manor plus The Old Vicarage & Mollett's Farm makes up the central portion of the ecological migratory route that connects the woodlands of Glemham Hall, Whin Covert, Nuttery Belt, Old Vicarage woodland, Pond Wood, Foxburrow Wood and Palant's Grove.

We are a vital section of the interlinking wildlife refuges, especially as we are surrounded by intensive arable farming. It is imperative that this connectivity is preserved in the best way it can be. EDF have failed to do so and have shown an indifference to our trees, woodland and ecology in their reports.

In this document we share the research that has been undertaken by people who have lived here for years and information from woodsmen & horticulturists who understand this land.

The Manor House dates back to at least 1602. Ancient woodland most probably pre-dates that. It is reasonable to suppose that the environs date back to at least the 17th century. We have a number of old ecological sites which support the widest biodiversity in the areas. We are also the second largest section of woodland in this unit. It would also leave a 1.3km gap of just farmland - no woodland cover - between Whin Covert and Foxburrow Wood.

The Wildlife Corridor

1. Glemham Hall Woodland & Parkland BAP: 96 hectares
2. Whin Covert Conifer woodland: 2 hectares, a section would be removed
3. Nuttery Belt Deciduous woodland (possibly AW) 0.4 hectares SEVERED, and a section would be removed
4. Farnham Manor/Hall etc.: over 6 hectares to be SEVERED and loss of Ancient Trees/large section of Ancient hedgerow to be removed.
5. Pond Wood Ancient Woodland AW and CWS with ponds
6. Wood pasture & Parkland BAP - one section includes a grove of Listed Ancient/Veteran oak pollards
7. Further ponds at Farnham Manor, 1 & Hall Cottages & Farnham Barn
8. 120m double Ancient hedgerow with Listed Ancient/Veteran trees that connects to AW Foxburrow Wood
9. Many parkland trees throughout all the gardens
10. The Belt 0.2 hectares PORTION TO BE REMOVED undesignated
11. Foxburrow Wood 3.2 hectares Ancient Woodland/CWS
12. Palant's Grove 0.8 hectares Ancient Woodland/CWS

This Wildlife Corridor is part of the historic ungulate migratory routes between all the woods; roe, red and muntjac, hare, badger, hedgehogs. The deer use our ponds in Pond Wood, as do hares and badgers. Our Ancient trees and woodlands are home to bats, barn, tawny, little owls, kestrels, sparrow hawks, and buzzards that forage between our Ancient trees and hedges, and fly between Pond Wood and the western edge of Foxburrow Wood.

Our Ancient Hedgerow on the access lane directly connects to Foxburrow Wood. EDF cannot present a proper picture to the Examining Authority without looking at how animals and birds actually use all the land, including movement corridors. It means looking at the inter-connectivity between Little Glemham woods, Nuttery Wood, woodland at The Old Vicarage, Pond Wood and Foxburrow Wood, as well as how our gardens contribute. The western woodland edge of Foxburrow Wood is another important part of this connectivity; many of our nesting birds and bats, which include buzzards, tawny, little and barn owls, kestrels and sparrow hawks are seen flying between that wood and woodlands on the western side of EDF's alignment. There are also two listed bat maternity roosts very close to EDF's proposed route in FHE.

We are greatly concerned about the impact on Pond Wood and also on Foxburrow Wood from noise, traffic pollution and severance, as opposed to a largely flat bypass to the east (the Parish Council route). The hydrology is now severely comprised along the northern side of Foxburrow Wood, where a new trench and land drain was installed by the farmer this winter to increase yields. The western edge of Foxburrow Wood has evidence of oak stress. This part of Suffolk is experiencing severe drought episodes. As far as we know, there is no hydrological study on the potential impact of such a deep interference with groundwater conditions from EDF's proposed deep cutting nor what that might mean for Foxburrow Wood, Pond Wood and the network of ponds in our properties. That deep cutting would also be a severe barrier to all the wildlife that live in our trees and woodlands.

We are contesting EDF's route on ecological grounds because they have not done a full and accurate assessment, including further concerns over Nuttrey Belt. The people of Farnham represented by the Parish Council, believe it is the wrong route and have proposed one that they believe is much better for the preservation of ecology.

The alternate route will not pose the same risk to ancient woodland or trees and indeed does not pass through woodland of that status, Foxburrow Wood and Pond Wood are also prime natural assets, as are our ancient trees and hedgerow.

EDF has demonstrated no good rationale for not accepting the eastern route. It would pass through the thin connecting strip between the two woods that is of low quality, and much self-sown, given that there was a road and no woodland originally in that 110 metres width. A wildlife under-passage would be possible because of better land levels, with a bypass that is banked, meaning connectivity of the wildlife corridor would be better preserved.