



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

Dear Sir/Madam,

### Reference: The Sizewell C 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 around 29,000 hectares (71,000 acres) and we have over 500,000 members and supporters.

The Trust has concerns regarding two elements of the proposed scheme, namely the Two Villages Bypass and the Sizewell Link Road. The Two Villages bypass will likely result in detrimental impact to Foxburrow Wood CWS (grid reference: TM3685659912) as well as potential direct loss and detrimental impact to the following veteran trees:

- Ancient Oak 207278 (grid reference: TM3696360250)
- Veteran Oak 207279 (grid reference: TM36976026)
- Veteran Oak 197460 (grid reference: TM36735978)
- Ancient Hornbeam 207176 (grid reference: TM3680659824)

The Sizewell Link Road will also impact two veteran trees. This includes veteran oak 48978 (grid reference: TM40376750) which is within the route of the Sizewell Link Road, and we are also concerned about the proximity of veteran oak 48980 (grid reference: TM40586738) to the nearby attenuation basin.

Foxburrow Wood is designated as ancient semi-natural woodland (ASNW) on Natural England's Ancient Woodland Inventory and all six specimens are verified as veteran trees on the Ancient Tree Inventory<sup>1</sup> (listed above with their ATI numbers).

### **Ancient Woodland**

Natural England<sup>2</sup> and the Forestry Commission 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*"

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<sup>1</sup> <https://ati.woodlandtrust.org.uk/>

<sup>2</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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*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 with some or all of the following characteristics... Its: great age, size, condition, biodiversity value 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<sup>58</sup> 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.*”

### **Impacts to ancient woodland**

Foxburrow Wood is adjacent to the proposed Two Village Bypass and therefore is likely to be detrimentally affected from the close proximity of the road. Natural England has identified the impacts of development on ancient woodland within their standing advice. This guidance should be considered as Natural England’s position with regards to development impacting ancient woodland:

*“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”*

Where ancient woods are in close proximity to a new road, there can be long-term impacts of increased noise and light pollution from traffic, dust pollution during both the constructional and operational phases of the road, and fragmentation of habitats from each other, including ancient woodland from other areas of semi-natural habitat; all of which will significantly impact on the woodland and likely result in the loss of local biodiversity. The woodland will also be subject to increased nitrogen oxide emissions from vehicles, which can change the character of woodland vegetation (in terms of species composition) through altering nutrient conditions.<sup>3</sup>

### **Rail Route**

The proposed rail route is for the purpose of temporary movement of materials during the construction of the power station. The Trust holds concerns with regards to the location of the temporary contractor compound, and requests that any structures are sited at least 15m away from the edge of Buckle’s Wood (grid reference: TM43156350) and fenced off during works. Similarly, any improvements to existing infrastructure should be fenced off during works, to protect the woodland from the impacts of noise and dust pollution.

### **Ancient and Veteran Trees**

Several ancient and veteran trees are likely to be significantly impacted by the proposed Sizewell Link Road and the Two Villages Bypass. Natural England has identified 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”*

It is essential that no trees displaying veteran characteristics are lost as part of the development. Any loss of ancient/veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.

The Trust is concerned that an Arboricultural Impact Assessment does not appear to have been submitted to support this consent order application. Therefore, we request that such a report is submitted for viewing, to ensure that all ancient and veteran trees subject to this scheme have been fully accounted for.

### **Mitigation**

Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts.

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<sup>3</sup> Sheate, W. R. & Taylor, R. M. (1990) The effect of motorway development on adjacent woodland. Journal of Environmental Management, 31, pp. 261-267

Natural England's standing advice for ancient woodland, states: *"Mitigation measures will depend on the development but could include:*

- *improving the condition of the woodland*
- *putting up screening barriers to protect woodland or ancient and veteran trees from dust and pollution*
- *noise or light reduction measures*
- *protecting ancient and veteran trees by designing open space around them*
- *identifying and protecting trees that could become ancient and veteran trees in the future*
- *rerouting footpaths*
- *removing invasive species*
- ***buffer zones"***

With regards to Foxburrow Wood, we consider that the road scheme should be sited **30m** from the woodland edge to alleviate impacts such as dust, noise and light pollution, and run-off containing pollutants, as well as to avoid damage to tree roots. To this end, we recommend that the buffer zone is planted prior to construction, to create a phased habitat to the ancient woodland that absorbs the indirect impacts occurring during the construction and operational phase.

This is backed up by Natural England's standing advice which states that *"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."* By using the 15m minimum in the standing advice, the applicant does not appear to have tailored the proposed buffer specifically for the proposed operations at this site.

Where development falls in close proximity to veteran trees, it is vital that these irreplaceable features are avoided. Natural England's standing advice states that *"a buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter."*

### **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,

Nicole Hillier  
Campaigner – Woods under Threat