

Yorkshire & North East

Foss House
Kings Pool
1-2 Peasholme Green
York
YO1 7PX

Tel 0300 067 4900

yorkshirenortheast@forestry.gsi.gov.uk

Area Director
Crispin Thorn

Date: 29th August 2018
Our ref: YNE/AUG/I&R/Statutory/2018
Your ref:

Michele Gregory
Case Manager
Planning Inspectorate
National Infrastructure
Temple Quay House
2 The Square
Bristol, BS1 6PN

BY EMAIL ONLY

Dear Michele Gregory,

Planning Act 2008 (as amended) and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 3

Application by Drax Power Ltd for an Order Granting Development Consent for the Drax Re-power Project

Location: Drax Power Station

Thank you for seeking our advice in your consultation for the above dated 26th June 2018.

The Forestry Commission is the Government experts on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009)^[1] for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008).

The Forestry Commission's responsibility is to discharge its consultee roles as efficiently, effectively and professionally as possible, based on the forestry principles set out in [REDACTED]

[1] [REDACTED]

██████████ (4th edition published 2017). **Page 23** Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance (SLNCIs).

The Forestry Commission has prepared joint ██████████ with Natural England on ancient woodland and veteran trees which we refer you to as it notes that ancient woodland is an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland. It highlights the Ancient Woodland Inventory as a way to find out if woodland is ancient.

We have reviewed Sections 1.7 (Landscape and Habitat Reinstatement and Enhancement) and 1.8 (Indicative Measures for the effective Management of the Proposed Enhancements) of the Outline Landscape and Biodiversity Strategy and generally support the proposals put forward, subject to the following considerations and in line the Government's ambition for Woodland Creation and increasing Woodland cover in England.

We recognise the purpose for the proposed Strategy to mitigate the effects of the Proposed Scheme on landscape and biodiversity features and enhance the value of such relevant features in accordance with relevant national and local planning policies. The Forestry Commission would recommend that these Landscape and Habitat Reinstatements are in accordance to the ██████████ (4th edition published 2017).

To meet the Government's objective to improve woodlands' resilience to climate change and contribute to climate change adaptation, along with addressing climate change as part of the new requirements outlined in Part 2c, Regulation 14 of Infrastructure Planning (Environmental Impact Assessment) Regulations (2017), it is important that the applicant includes at least "a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment".¹

As recognised in the European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment, "climate change and biodiversity are generally complex issues with long-term impacts and consequences. EIAs that aim to properly address biodiversity and climate should take this into account and assess the combined impact of any number of different effects. This requires an understanding of evolving baseline trends and an assessment of the cumulative effects of the project on the changing baseline."²

To meet these requirements, the Forestry Commission would like to reiterate the importance of all woodlands in making our rural and urban landscapes more resilient to the effects of climate change and contribution to wider climate change adaptation. Consideration for how sustainable woodland creation and management of England's Woodlands can be secured is utilised within this proposed development will secure the role that woodlands have in reducing greenhouse emissions, carbon sequestration and contributing towards moving to a low carbon economy. We also suggest that a Forestry Commission template management plan: [C ██████████](#) ██████████ would be recommended, to ensure long term viability of created habitat and existing woodland in the proposed boundary for this consultation and the land in current ownership / management / influence of the DRAX power station.

The Forestry Commission would also highlight the future resilience of the proposed planting particularly in relation to current Tree Health issues in Yorkshire and across the UK such as:

¹ ██████████
██████████

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 why.

5.3.18 The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:

- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;
- during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;
- habitats will, where practicable, be restored after construction works have finished; and
- opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.

Appendix 3: National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)

Part 2 Assessment and Technology-Specific Information

2.21.6 In circumstances where the habitat to be crossed contains ancient woodland, trees subject to a Tree Preservation Order, or hedgerows subject to the Hedgerows Regulations 1997, the applicant should consider whether it would be feasible to use horizontal direct drilling under the ancient woodland or thrust bore under the protected tree or hedgerow and the IPC should consider requiring this, where not included in the proposal.

Appendix 4: other relevant policies and documents

The Clean Growth Strategy: Leading the way to a low carbon future³ (Updated April 2018)

Page 107: What is natural capital? "Natural capital enables us to think about our natural environment and the countryside as a set of valuable assets (for example, forests, clean air, soils, species, freshwaters, oceans and minerals). Like any asset, natural capital, if maintained and invested in, provides flows of services to the economy and society. These include food, energy, carbon sequestration, pollutant removal, flood risk reduction, recreational and educational opportunities, health benefits and many others."

Paragraph 7: "During the 2020s we need to accelerate the rate of tree planting, working towards our 12 per cent tree cover aspiration by 2060. ... Recently published natural capital accounts by the Office for National Statistics show that Britain's woodlands provide services of £2.3 billion per year to the economy in terms of recreation, carbon sequestration, timber and air pollutant removal."

A Green Future: Our 25 Year Plan to Improve the Environment⁴ (Updated February 2018)

Foreword from the Prime Minister: "Our natural environment is our most precious inheritance. The United Kingdom is blessed with a wonderful variety of natural landscapes and

■ [REDACTED]
■ [REDACTED]
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habitats and our 25 Year Environment Plan sets out our comprehensive and long-term approach to protecting and enhancing them in England for the next generation. ... By using our land more sustainably and creating new habitats for wildlife, including by planting more trees, we can arrest the decline in native species and improve our biodiversity."

Foreword from the Secretary of State: "Respecting nature's intrinsic value, and the value of all life, is critical to our mission. For this reason we safeguard cherished landscapes from economic exploitation, protect the welfare of sentient animals and strive to preserve endangered woodland and plant life, not to mention the greening of our urban environments. ... We need to replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats."

Page 19: "The value of natural capital is routinely understated. If we look at England's woods and forests, for example, as a national asset, using a natural capital approach, the value of the services they deliver is an estimated £2.3bn. Of this sizeable sum, according to a recent study, only a small proportion – 10% – is in timber values. The rest derives from other benefits provided to society, such as human recreation and carbon sequestration – the process by which trees lock-up and store carbon from the atmosphere."

Page 47: "We will increase tree planting by creating new forests, and incentivising extra planting on private and the least productive agricultural land, where appropriate. This will support our ambition to plant 11m trees. ... We will not focus solely on planting, however; we will also support increased protection of existing trees and forests. ... Beyond the economic benefits, the Government recognises the significant heritage value and irreplaceable character of ancient woodland and veteran trees. We are committed to ensuring stronger protection of our ancient woodlands, making sure they are sustainably managed to provide a wide range of social, environmental, societal and economic benefits."

Industrial Strategy White Paper "Building a Britain fit for the future"⁵ (Published November 2017)

Page 43: "We also want everyone to feel the benefits of clean growth, so we will work to create a future where our cities benefit from cleaner air, our businesses from enhanced resource security and our countryside from regenerated natural capital."

Page 135: "We will work not just to preserve, but to enhance our natural capital – the air, water, soil and ecosystems that support all forms of life – since this is an essential basis for economic growth and productivity over the long term."

Page 148: "We are committed to moving towards a more circular economy – to raising productivity by using resources more efficiently, to increasing resilience by contributing to a healthier environment, and to supporting long-term growth by regenerating our natural capital."

BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations⁶ (published April 2012)

Trees are important elements of green infrastructure, contributing to urban cooling through evapotranspiration and providing micro-climatic effects that can reduce energy demands in buildings. They therefore represent a key resource that can significantly contribute to climate change adaptation.

Page 10 "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland"