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2nd May 2023

Reference: The Examining Authority's second written questions and requests for information (WQ2)

Dear Menaka Sahai,

The Woodland Trust would like to take the opportunity to respond to the question posed by the Planning Inspectorate in relation to the **Sheringham and Dudgeon Extension Project** consent order application. The Trust's responses are as follows:

Q2.13.2.2:

- a) **Does the Applicant's response [REP1-036, Q1.13.3.1] provide sufficient clarity on their proposed approach to mitigation of possible impacts to Ancient Woodlands?**
- b) **Is the Applicant's proposed approach to mitigation of possible impacts on Ancient Woodlands satisfactory at this stage?**
- c) **If not, set out which adverse effects would require further mitigation.**

The Trust notes the applicant states that no ancient woodland is located within the order limits, however the Environmental Statement - Chapter 20 - Onshore Ecology and Ornithology (Revision B) [REP2-024] is contradictory: "*Ancient woodland is present within the DCO order limits and information relating to this is presented in Section 20.5.2. The onshore cable corridor has avoided ancient woodland in the majority of cases; however two sections of ancient woodland are crossed and these are specifically Colton Wood and Smeeth Wood.*" (reference: Table 20-5: NPS Assessment Requirements). This should be clarified further.

The Trust would primarily advocate for the redirection of any cabling through ancient woodland areas, however if such works are likely to occur should development consent be granted, then we would appreciate further clarification on the technique and any potential impacts posed. It is not clear what works will be proposed in terms of direct access to the cable, whether tree felling works for cable access within ancient woodland areas are proposed, or whether any maintenance works can be undertaken remotely from the surface as a result of this technique.

The applicant's response outlines that the minimum drill depth under ancient woodlands will be two metres. Given that the irreplaceable nature of ancient woodland is bound to their soils, we hold concerns that even at this depth, detrimental impact is likely to occur. We would seek further evidence that this would not be the case. We'd also be concerned about the potential for hydrological changes as a result of the works.

Our wider concerns for the scheme, and our route-wide buffer zone recommendations for ancient woods and trees, is outlined in further detail within our written representation [REP1-164] which may be of interest.

Q2.17.3.1:

- a) **Are you satisfied that the Applicant's proposals for the removal, replanting and management of existing trees and hedgerows have been set out to a sufficient level of detail at this stage [REP1-036, Q1.17.1.11]?**
- b) **In particular, is the Applicant's approach to managing the likelihood of damage occurring to existing trees and hedgerows during the construction period sufficiently clear [REP1-036, Q1.17.1.11]?**

Our consultation response relates solely to the impact to ancient woodland and ancient/veteran trees; however, the Woodland Trust more broadly does advocate for the retention of all healthy, mature trees in line with the mitigation hierarchy. A full Arboricultural Impact Assessment should be provided, outlining where the proposed cabling works will affect tree roots of retained trees, alongside an Arboricultural Method Statement. Where ancient or veteran trees are affected, Natural England/Forestry Commission's Standing Advice¹ should be heeded, especially regarding buffer zone recommendations.

With respect to tree planting, tree stock should be UK and Ireland sourced and grown (UKISG), and any planting should be monitored for a minimum of 50 years to ensure survival and habitat viability. Natural regeneration opportunities should be considered, and the applicants should support the implementation of local strategies for nature recovery to improve connectivity with the wider landscape. The Woodland Trust has published a woodland creation guide² which provides further information and advice.

Q2.17.3.4: Set out whether the Applicant's approach [APP-303] and as further clarified in its response to WQ1 [REP1-036, Q1.17.1.12] is a reasonable one at this stage of the Examination.

Please see previous responses above.

We hope that the following is sufficient to answer the Examining Authority's questions, however, please do not hesitate to get in touch if further information is required.

Yours sincerely,

Nicole Moses
Campaigner – Woods Under Threat
Woods Under Threat Team

¹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

² [h \[REDACTED\]](#)