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To Whom It May Concern,

Reference: Rampion 2 Offshore Windfarm

The Woodland Trust is the UK's largest woodland conservation charity and a leading voice in bringing to the attention of government, landowners and the general public the state of the UK's woods and trees. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters.

The Trust also campaigns with the support of local communities, to prevent any further destruction of ancient woods and veteran trees. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of a planning application.

Woodland Trust Position

The Woodland Trust **holds concerns** regarding the proposed route alignment corridor of Rampion 2 Offshore Windfarm on the basis of potential deterioration of ancient woodlands and veteran trees. Please see the appended table at the bottom of the document (Annex 1) for the woods and trees in question.

Ancient Woodland

Ancient woodland is an irreplaceable resource of great importance for its wildlife, soils, recreation, cultural value, historical and archaeological significance, and the contribution it makes to our diverse landscapes. It is a scarce and threatened resource, covering only 2.5% of England's land area, and has a high level of protection in planning policy.

Natural England and the Forestry Commission, the Government's respective bodies for the natural environment, define ancient woodland as follows within their standing advice[1]:-

"*Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes:-*

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

- *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"*

Both ASNW and PAWS woodland are given equal protection in government's National Planning Policy Framework (NPPF) regardless of the woodland's perceived condition, its size, or the features it contains.

In May 2022, the Government published an updated policy statement on ancient woodland, entitled 'Keepers of Time: ancient and native woodland and trees policy in England'[2]. The Government's 'Keepers of Time' policy accentuates the importance of ancient woodland, stating: *"Ancient woodlands, ancient wood pastures and parkland and ancient and veteran trees are irreplaceable habitats which must be protected. Their long-standing presence, species and form serve as a rich cultural record of past management practices."*

As a result of its great age, ancient woodland is characterised by a unique, complex and irreplaceable ecosystem of plants and animals, both above ground and in the soils. It is therefore impossible to recreate the ecosystem of an ancient woodland by planting new woodland. This is widely recognised by experts and by Natural England and the Forestry Commission in their joint standing advice.

Veteran Trees

Ancient and veteran trees are irreplaceable habitats and afforded a high level of protection in planning policy. Ancient and veteran trees possess unique features which provide a rich and diverse range of habitats, playing host to countless other species. In particular, many rare invertebrate, fungi and lichen species are dependent on the decaying wood provided by such trees[3]. Veteran trees are disproportionately valuable parts of the natural environment and where they occur outside of woods they are also particularly important for landscape connectivity.[4] They are also an essential part of our landscape and cultural heritage.

Natural England and Forestry Commission's standing advice on ancient and 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 also irreplaceable habitats.*

"A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value.

"An ancient tree is exceptionally valuable. Attributes can include its: great age; size; condition; biodiversity value as a result of significant wood decay and the habitat created from the ageing process; and cultural and heritage value."

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[2] https://www.gov.uk/government/publications/keepers-of-time-ancient-and-native-woodland-and-trees-policy-in-england/keepers-of-time-ancient-and-native-woodland-and-trees-policy-in-england

[3] https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf

[4] Ancient and veteran trees. An assessment guide. (woodlandtrust.org.uk)

The Planning Practice Guidance (PPG) for Natural Environment[5] provides additional clarity on the status of ancient and veteran trees. It states: "*Ancient trees are trees in the ancient stage of their life. Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species.*"

As with ancient woodland, Government's '*Keepers of Time*' policy expresses the importance of ancient and veteran trees: "*Ancient and veteran trees are rich in biodiversity. They provide food, shelter and breeding sites to large numbers of species including birds, bats, fungi and insects, which are often restricted in their distribution. They can be found both inside and outside of woodlands.*"

Planning Policy

Paragraph 5.3.14 of the **Overarching National Policy Statement for Energy (EN-1)** 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 IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. 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 why."*

The draft revised **Overarching National Policy Statement for Energy (EN-1)** published March 2023 outlines the following:

5.4.32: "*Applicants should include measures to mitigate the direct and indirect effects of development on ancient woodland, veteran trees or other irreplaceable habitats during both construction and operational phase."*

5.4.54: "*The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."*

The **National Planning Policy Framework**, paragraph 186, 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[67] and a suitable compensation strategy exists;"

Impacts to Ancient Woodland

We are specifically concerned about the following impacts to the ancient woodlands in question:

- We understand that trenchless crossings are proposed for a number of ancient woodlands within the corridor route to a depth of six metres.

[5] https://www.gov.uk/guidance/natural-environment

- Permanent fragmentation due to the removal of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats if continued access to the cable once constructed is required.
- Noise and dust pollution impact to woodlands within close proximity of the cable installation area.
- The potential for trampling of sensitive ancient woodland flora and soils if access is required within any ancient woodland.

Mitigation for ancient woodland

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. Natural England and the Forestry Commission's standing advice contains guidance on mitigation measures to alleviate impacts on ancient woods and trees (annexed to this letter).

Potential mitigation approaches for the protection of ancient woodland are outlined in our Planners' Manual[6]. Such approaches would help ensure that the development meets policy requirement and guidance, including:

- Non-invasive root investigation for ancient trees and protection beyond the limit of the usual investigative tools.
- Measures to control noise, dust and other forms of water and airborne pollution.
- Sympathetic design and use of appropriate lighting to avoid light pollution.
- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.
- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
- Woodland restoration – such as in PAWS.
- Introduction of sympathetic management for neglected woodlands or trees.

Buffering

Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland.

As outlined in our statutory consultation responses, we acknowledge that 25 metre buffers have been afforded to ancient woodlands adjacent to the scheme boundary. However, any opportunities to increase the buffer zone further should be considered. If not appropriately accounted for, trees may become subject to removal if they are considered to impact on the cables belowground, affecting their long-term viability. During construction, HERAS fencing fitted with acoustic and dust screening measures should be put in place to ensure that the buffer zone does not suffer from encroachment of construction vehicles/stockpiles.

We wish to refer you to Natural England and Forestry Commission's standing advice which states that "*the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a*

[6] https://www.woodlandtrust.org.uk/media/51656/planners-manual-for-ancient-woodland.pdf

significant increase in traffic." Further information on buffer zones is outlined in the annex below.

Trenchless crossings

We understand that four areas of ancient woodland are to be subject to trenchless crossings in order to limit the removal of irreplaceable ancient woodland soils during construction. We primarily advocate for the redirection of any cabling that is presently proposed through ancient woodland areas. However, if the Inspector is minded towards granting consent for the development then we would appreciate further clarification on the technique used for these crossings and any potential impacts posed.

The application documents outline that the minimum drill depth under ancient woodlands will be six metres. We consider that the roots and rooting environment of ancient woodland trees is highly unlikely to extend this deep, however, we would expect to see full evidence that this would not be the case and that the ancient woodland would be unaffected by this aspect of the development, during both construction and operation. We would also expect to see some form of evidence to demonstrate that the works would not result in any hydrological changes or altering of soil conditions within the ancient woodland.

Furthermore, we note that maintenance works will require access into the woodland, which could lead to surface-level disturbance and damage. It is not clear what works will be proposed in terms of direct access to the cable, or whether any maintenance works can be undertaken remotely from the surface as a result of this technique.

Veteran trees

While we acknowledge that the applicants have afforded the veteran trees along the route with buffer zones in line with Natural England/Forestry Commission's standing advice, we would seek confirmation that the veteran buffer zones of T367 and T1199 are wholly protected from the works via a commitment from the applicants as part of the examination process.

Conclusion

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. Any development resulting in loss or deterioration of ancient woodland must consider all possible measures to ensure avoidance of adverse impact.

At present, the Woodland Trust does not hold full confidence that the proposed development would avoid harm and deterioration of ancient woodland and veteran trees. We would welcome further clarification on the points we have raised within this representation.

We hope you find these comments helpful - if you would like to discuss any of the points raised, please contact us at campaigning@woodlandtrust.org.uk.

Yours sincerely,

Jack Taylor
Programme Lead – Woods Under Threat
Woods Under Threat Team

Annex 1:

Section	Ancient woodland/tree	Designation	Grid reference	Impacts
Work no. 9	Michelgrove Park	PAWS	TQ0761008058	Trenchless crossing
	T1199	Veteran	TQ0745708015	VTB enc. from alternative trenchless crossing compound boundary
	Oaken Copse	PAWS	TQ0741908388	Trenchless crossing
	Beech Copse	ASNW	TQ0754108694	Trenchless crossing and proximity to alternative trenchless crossing compound boundary
	Calcot Wood	PAWS	TQ1735614905	Trenchless crossing
	T367	Veteran	TQ2288821730	VTB enc. from open-cut indicative corridor
Work no. 19	Priorsbush	ASNW	TQ2429321503	Adjacent to open-cut indicative corridor (approx. 25m)
	Priorsbush	ASNW	TQ2434521366	

Annex 2:

Natural England and Forestry Commission's standing advice:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions

Direct and indirect effects of development:

Development, including construction and operational activities can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby.

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:

- *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*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*
- *damaging archaeological features or heritage assets*
- *changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss*

Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- *breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects*
- *reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species*
- *reducing the resilience of the woodland or trees and making them more vulnerable to change*
- *increasing the amount of dust, light, water, air and soil pollution*
- *increasing disturbance to wildlife, such as noise from additional people and traffic*
- *increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*
- *changing the landscape character of the area*

Mitigation measures

Mitigation measures will depend on the type of development. They could include:

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

Use of buffer zones

Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the:

- *scale and type of development and its effect on ancient woodland, ancient and veteran trees*
- *character of the surrounding area*

For example, larger buffer zones are more likely to be needed if the surrounding area is:

- *less densely wooded*
- *close to residential areas*
- *steeply sloped*

Buffer zone recommendations

Where possible, a buffer zone should:

- *contribute to wider ecological networks*
- *be part of the green infrastructure of the area*

A buffer zone should consist of semi-natural habitats such as:

- *woodland*
- *a mix of scrub, grassland, heathland and wetland*

The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.

You should not approve development proposals, including gardens, within a buffer zone.

You should only approve sustainable drainage schemes if:

- *they do not affect root protection areas*
- *any change to the water table does not negatively affect ancient woodland or ancient and veteran trees*