

25<sup>th</sup> April 2024

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**Area Director**

Jane Hull

**Forestry Commission responses to Examination questions regarding Rampion 2 Offshore Wind Farm**

Dear Examining Authority,

Thank you for seeking the Forestry Commission's advice about the impacts that this project may have on Ancient Woodland. **As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.**

We have reviewed the questions sent for our consideration by Deadline 3 (25<sup>th</sup> April) and have made the following comments that we request is considered as part of the Examination process.

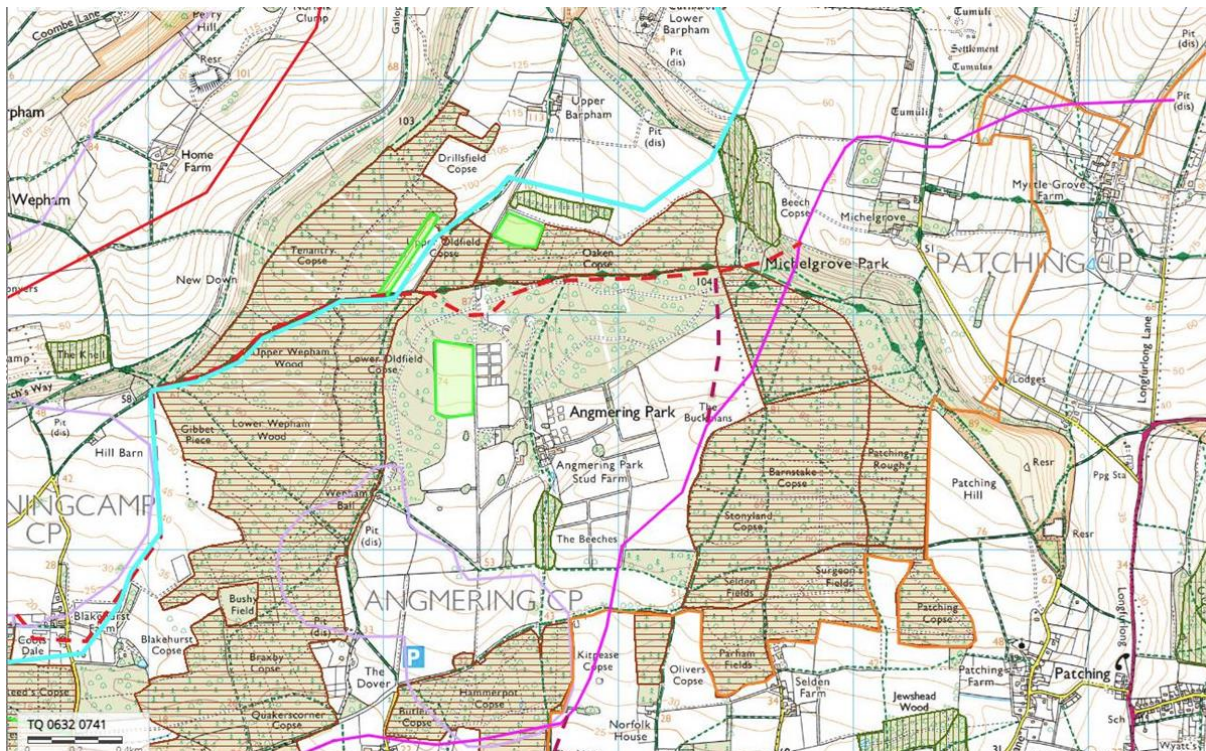
**COD 1.1 – Horizontal Directional Drilling (HDD)**

We continue to accept the principle of Horizontal Direct Drilling underneath ancient woodland compared to more harmful methods ***where suitable evidence demonstrates that this is feasible and will not result in loss or deterioration of ancient woodland, and where all viable alternatives have been fully exhausted*** including moving the route away from ancient woodland.

However, despite the applicant's commitment C-5 (APP-254), we remain concerned regarding the viability of this approach being able to fully avoid loss or deterioration of ancient woodland in line with the mitigation hierarchy. While we have accepted the principle of the approach and the applicant asserts the risks are low, it is our view that there is currently insufficient evidence to provide the level of confidence required at the Examination stage to ensure that a trenchless method, which full avoids deterioration or loss of ancient woodland, will be viable.

We advise that the assessment within the ES should be based on detailed ground investigations and geomorphological surveys as part of a feasibility study is required to provide an acceptable level of confidence that deterioration and loss can be fully avoided. There is a risk that if consent is permitted before the above measures have been carried out, it could result in a scenario where open trench solutions are the only technical solution that remains technically viable over alternatives.

In addition, the route appears to have changed from what we had consulted on during the Consultation stage to a route that which now requires HDD over a greater extent of ancient woodland including Oaken Copse and Michelgrove Park in addition to Wapham Wood (ie from the turquoise route to the dashed red route in the below map). We are of the understanding from previous engagement with this project that it would not be viable to drill the distance involved to avoid damage to ancient woodland via this route, and that there would be a need for clearance of ancient woodland. We ask that further consideration and assurance are given regarding to the feasibility of this particular aspect of the route, and ask the applicant to demonstrate how previous concerns regarding this part of the route have been overcome.



### **TE 1.30 - Impacts to designated sites and Ancient Woodland**

As advised in previous responses (most recently on the 6<sup>th</sup> of November 2023), we appreciate the efforts that have been made to avoid impacts to trees and woodland. However, we do have concerns regarding the residual impacts and provide the below advice that we request be committed to as part of ensuring suitable mitigation measures will be in place as part of the detailed landscape and ecological management plan.

#### ***Connectivity***

We have previously raised concerns regarding the impacts of habitat fragmentation and loss of connectivity from the project. The ES states that impacts relating to habitat fragmentation are 'negligible'. However, the extent of hedgerow/linear habitat loss or disruption does not appear to have been fully quantified in the supporting documentation. It is therefore unclear how a negligible effect has been established with enough confidence especially given the multiple areas of woodland that are being reduced in extent or severed, and the cumulative impact this could have on the wider network of habitats.

We advise that in order to comply with the mitigation hierarchy, connectivity should be retained as far as possible and that any residual loss of connectivity is compensated with significant and targeted habitat creation and enhancement to improve connectivity between new and existing woodland habitat. This could include a variety of measures to provide coordinated and joined up wildlife corridors and stepping stone habitats: additional native hedgerow creation, bolstering/widening of existing hedgerows, targeted tree planting and enhancement of existing hedgerow enhancement such as through hedge-laying. For all measures, appropriate management and maintenance is also required to ensure successful establishment. We request that the above measures are included within the detailed LEMP and biodiversity net gain design as this emerges and ask that commitments are made to this effect before consent is granted.

#### ***Buffer zones***

We welcome the principle of using a bigger buffer than the minimum quoted in the Standing Advice (25m instead of 15m). However, it is not clear how this figure has been ascertained and whether this is suitable for avoiding all indirect and direct impacts on ancient woodland, in line with the Standing Advice for ancient woodland, ancient trees and veteran trees. For example, changes to hydrology as a result of construction works proposed, and the impacts this can have on woodland habitat. We also request that the buffer areas are enhanced ecologically as part of avoiding impacts by bolstering woodland edges with habitat creation/enhancement and as part of targeting beneficial net gains in biodiversity in the project's approach to BNG.

### ***Compensation measures***

We ask that active management to enhance woodland condition be included as part of the project's mitigation and compensation measures where this is in scope of the project. In particular, management of ancient woodland should be prioritized given the inherently high value of its soils and potential for biodiversity that is harder and takes much longer in new woodland creation.

While we welcome the commitment to woodland creation to compensate for woodland loss (which is predominantly priority broad-leaved woodland habitat), we advise that the scale of creation does not seem proportionate to the loss (0.47 Ha lost to 2.7 Ha gained) when considering the years of establishment that the new woodland will take to provide the same level of value to biodiversity. However, without the detailed biodiversity net gain calculations based on suitable ecological surveys, it is difficult to provide a fully informed view. We request that the latest biodiversity net gain Metric and good practice (including the Metric user guide) is followed as part of the project's commitment to biodiversity net gain to ensure that this is achievable. We request that we are directly consulted as part of the final detailed LEMP so that we can provide more detailed advice that follows good practice.

### **3. TE 1.31 Approach to hedge notching**

We have no further comments regarding hedge notching at this time except that we support in principle that this be accompanied by suitable monitoring and restocking to ensure measures are achieved in practice, in addition to the measures requested above to improve connectivity,

We hope that you find our response helpful and we remain committed to supporting the Examining Authority and applicant further to help avoid impacts as far as possible and maximise the value of biodiversity gains.

Yours sincerely,

Richard Cobb  
Local Partnership Advisor

South East and London Area Team  
Forestry Commission