The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Telephone
01476 581111
Facsimile
01476 590808
Website
woodlandtrust.org.uk

Dogger Bank South Offshore Wind Farms Case Team
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

29th January 2025

Interested Party reference 20050168

Dear Project Team

Reference: EN010125
Proposal: Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for an Order Granting Development Consent for the Dogger Bank South Offshore Wind Farms

Objection – loss and deterioration of ancient woodland

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.

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 the development consent application to the Planning Inspectorate.

Woodland Trust Position
The Trust **objects** to this planning application on the basis of loss and deterioration of ancient woodland (grid ref: TA 0217 3680), designated as an Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory (AWI).

Our main concerns relate to the proposals for horizontal directional drilling beneath the ancient woodland.

Impact on Ancient Woodland
We welcome the proposal for an un-encroached 15 metre buffer to the ancient woodlands within the site. In particular we note confirmation in the Arboricultural Method Statement that the SUDs and drainage connection pipework will be positioned outside of the 15 metre

buffer zone to the ancient woodland, and outside of the root protection area of tree T039, situated at the edge of the woodland.

However, we have serious concerns in relation to the proposals for horizontal directional drilling beneath the ancient woodland. We are strongly of the view that the proposed minimum drill depth of one metre is insufficient to ensure that the installation would not have a detrimental impact on tree roots and the rooting environment beneath the ancient woodland, and that such a depth would not necessarily avoid the rhizosphere.

We note that all drilling related infrastructure and equipment would be sited outside the 15 metre buffer zone to the ancient woodland. However, we are concerned about the following impacts on the ancient woodland:-

- Damage to ancient woodland soils and the rhizosphere as a result of drilling beneath the woodland.
- Encroachment on the root systems and rooting environments of trees within the ancient woodland as a result of drilling beneath the woodland.
- Encroachment on the root systems and rooting environments of trees growing along the woodland edge as a result of drilling beneath the buffer zone.
- Disturbance to sensitive fauna from noise and vibration occurring during construction and drilling works.
- Potential for adverse hydrological impacts arising from soil/ground disturbance and changes to soil porosity.
- Impacts associated with future maintenance work.

The proposal is to drill at a minimum depth of one metre “beneath retained trees”. Irrespective of the fact that tree roots can be found at much greater depths than one metre, the irreplaceable nature of ancient woodland is bound to its soils. One of the most important features of ancient woodlands is the quality and biodiversity of the soils which have evolved over hundreds of years. They have been undisturbed physically or chemically for long periods of time and support complex relationships between species above and below ground. Drilling within the ancient woodland will potentially have a detrimental impact on these soil communities. The disturbance, vibration and compaction associated with drilling beneath ancient woodland has potential to affect the condition of the soils and the rhizosphere situated not only in the path of the drilling route, but also above the level of drilling.

Mitigation

It needs to be ensured that the works will not result in any detrimental impact on the ancient woodland in line with paragraph 193 of the National Planning Policy Framework (NPPF) and Natural England and Forestry Commission's standing advice.

The applicant should provide evidence to demonstrate the following:-

- All potential alternative options to drilling beneath ancient woodland have been fully explored and shown not to be feasible.
- Drilling would be undertaken at a sufficient depth to ensure that there will be no adverse impacts on roots, soils or rhizosphere along or above the proposed route.
- Entry and exit points and all associated infrastructure and works would be situated at a sufficient distance from the outer edge of the 15 metre buffer zone to ensure that an appropriate drilling depth is achieved before crossing into the buffer zone.

- The works would not result in any hydrological changes within or beneath the ancient woodland.
- It would be possible to undertake all future maintenance, and work to address any faults with the cabling equipment, remotely without the need to disturb the ground within the ancient woodland or encroach the 15 metre buffer zone.

We would advise that drilling should be undertaken **at a minimum depth of 5 metres** unless clear evidence is provided to demonstrate that a shallower depth would not result in adverse impacts on roots, soils or rhizosphere along or above the proposed route.

Impacts on Veteran Trees

We are pleased to note that the nine veteran trees identified on site will be afforded un-encroached veteran tree buffer zones in line with Natural England and Forestry Commission's standing advice. Additionally, we welcome the commitment to register the nine veteran trees on the Ancient Tree Inventory (ATI) and note the applicant's comments in relation to the three ATI trees (one veteran oak and two notable elm) previously identified in our Relevant Representation.

Based on our understanding of the application there are no proposals for horizontal directional drilling beneath veteran trees. If this is not the case, or if the plans are modified in this respect, we would appreciate the opportunity to comment further in view of the extensive rooting systems associated with veteran trees.

Unmapped Ancient Woodland

Ancient woodland is an irreplaceable resource of great importance for its wildlife, soils, recreational and 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.

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'[1]. 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."*

In our Relevant Representation we recommended that any non-ancient woodlands potentially impacted by the proposals should be reviewed to ensure any areas of potentially unmapped ancient woodland are accounted for and protected. We were not able to find information in relation to this within the application documentation. Surveys detailing the woodland flora and fauna alongside an assessment of historical mapping should be undertaken, to ensure impacts to all irreplaceable habitats are considered and mitigated as part of the design process.

Planning Policy

The National Planning Policy Framework (NPPF), paragraph 193, states: "*When determining planning applications, local planning authorities should apply the following principles:-*

[1] 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

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[70] and a suitable compensation strategy exists;"

Footnote 70 defines exceptional reasons as follows: "*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."*

Conclusion

Ancient woodland is an irreplaceable habitat; once lost it is gone forever. As such, it should be protected from any form of development that will result in its loss or deterioration.

The Trust **objects** to this application on account of loss and deterioration of irreplaceable habitat associated with the proposals for horizontal directional drilling.

Please don't hesitate to contact us at planningcasework@woodlandtrust.org.uk if it would be helpful to discuss any of the points raised.

Kind regards

Cathy Johannesen
Programme Officer - Woods Under Threat