



The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Telephone
01476 581111

Facsimile
01476 590808

Website
woodlandtrust.org.uk

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

11th October 2023

Dear Andrew Mahon,

Reference: EN020002 - Bramford to Twinstead

Objection – Impact to woods and trees

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. 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 ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the Development Consent Order application to the Planning Inspectorate.

The Trust **objects** to the proposed route alignment on the basis of direct loss of a veteran oak tree (T378), alongside concerns regarding potential deterioration of ancient woodland habitats which are adjacent to the proposed limits of deviation for new infrastructure (including the proposed substation). Of particular concern are the following woodlands:

- Tom's/Broadoak Wood CWS (grid reference: TM0565241446)
- Butler's Wood (grid reference: TL8434837366)
- Waldegrave Wood (grid reference: TL8439637018)
- Broom Hill Wood CWS (grid reference: TL9787338961)

Ancient Woodland

Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and protecting, expanding and promoting the sustainable management of woodlands, define ancient woodland as follows within their standing advice¹:

"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 features it contains.

Veteran Trees

Natural England’s standing advice on 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.”*

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 180, 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 reasons⁶³ and a suitable compensation strategy exists;”

Further to this, paragraph 174 of the NPPF states the following: *“Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing net gains for biodiversity, including by establishing coherent*

ecological networks that are more resilient to current and future pressures". Where an application involves the loss of irreplaceable habitats, such as veteran trees, net gain for biodiversity cannot be achieved.

Impact and mitigation for Ancient Woodland

We are specifically concerned about the following potential impacts to ancient woodlands that are adjacent to the proposed new transmission infrastructure:

- 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 transmission line once constructed is required.
- The impacts of noise and dust pollution to woodland within close proximity of the transmission installation.
- Trampling of sensitive ancient woodland flora and soils if access is required within any 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 Forestry Commission have also produced guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice (please see the annex at the foot of the document).

Additional mitigation approaches are also outlined in our Planners' Manual²; these measures would help ensure that the development meets policy requirement and guidance and include:

- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
- Measures to control noise, dust and other forms of water and airborne 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.

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. This development should allow for a buffer zone of **at least 30 metres** to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage.

This is backed up by 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 significant increase in traffic."* Further information on buffer zones is outlined in the annex below.

In addition, the proposed upgrade works will require dismantling of existing infrastructure within ancient woodland habitats including Hintlesham Wood SSSI, and therefore sensitive

² <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

management of these works will be required. HERAS fencing, fitted with acoustic and dust screening measures should be erected along the wayleave edge, and the use of construction vehicles should be restricted wherever possible to outside of the ancient woodland areas.

Mitigation for veteran trees

It is essential that no veteran trees are lost as part of the development. We therefore hold serious concerns regarding the loss of T378. The loss of veteran trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Any loss of veteran trees can also be highly deleterious where there is a wider population of veteran trees within close proximity, which may harbour rare and important species.

We welcome the applicant's commitment to provide retained veteran buffer zones in line with Natural England and Forestry Commission's Standing Advice and all works should be maintained outside of this zone for veteran trees which are within proximity to the limits of deviation (T196, T256, T264 and T272). If works near to these trees are required, we would ask that no digging occurs within the RPA as calculated to BS:5837:2012 specifications, and any works within the veteran buffer zone should be undertaken by hand.

Conclusion

Ancient woods and veteran trees are irreplaceable habitats, once lost they are gone forever. Any development resulting in loss or deterioration of ancient woods and trees must consider all possible measures to ensure avoidance of adverse impact.

Yours sincerely,

Nicole Moses
Campaigner – Woods Under Threat
Woods Under Threat Team

Annex:

**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*