

**North West & West Midlands Area Office**

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**Area Director**  
Keith Jones

Date 18<sup>th</sup> December 2021

**By Email Only**

Dear Sir/Madam

**Response to the M54 to M6 Link Road Consultation**

The Forestry Commission (FC) is the government department responsible for protecting, expanding, and promoting the sustainable management of woodlands in England. It is a Non-Ministerial Government Department and part of the Defra Group. Please find the Forestry Commission's response to the consultation below.

**Impacts of the scheme**

Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "*there are wholly exceptional reasons and a suitable compensation strategy exists*" (National Planning Policy Framework paragraph 175).

We also particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide and Case Decisions](#).

As a Non Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather we are including information on the potential impact that the proposed development would have on the ancient woodland.

The [UK Forestry Standard \(UKFS\)](#) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements. The UKFS has a **general presumption against deforestation**. Page 23 of the Standard states that: "Areas of woodland are material considerations in the planning process..."

In addition, lowland mixed deciduous woodland is on the Priority Habitat Inventory (England). This recognises that under the UK Biodiversity Action Plan they were recognised as being the most threatened and requiring conservation action. The UK Biodiversity Action Plan has now been superseded by the [UK Post-2010 Biodiversity Framework](#) but this priority status remains. It is carried forward under the [Section 41 lists of the Natural Environment & Rural Communities Act \(2006\)](#) and both lowland mixed deciduous woodland and wet woodland are termed 'habitats of principal importance in England'.

We would expect to see a thorough assessment of any loss of all trees and woodlands within the project boundary and the development of mitigation measures to minimise any risk of net deforestation as a result of the scheme.

We would expect inclusion of an assessment of any woodlands under an existing woodland grant scheme and or a felling licence agreement to ensure these agreements will not be negatively impacted.

### **Mitigation Planting**

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones could include further tree and woodland planting or a mosaic of semi-natural habitats. The fragmentation of woodlands impacts habitat quality and the resilience of woodlands to climate change.

Species selection is an important consideration. Native tree species will support a wide range of wildlife. However considering a range non-native tree species is also important. By providing greater diversity these can help mitigate the impacts of climate change as well as improving aesthetics and resilience to tree disease.

To be effective, the longevity of mitigation measures and commitment to maintenance and aftercare is essential and should be appropriately resourced. Bat boxes and other constructed habitat features may need to be repaired, replaced or re-sited after a period of time. Woodland and tree planting require maintenance and aftercare to ensure successful establishment.

We would expect to see effective and practicable proposals for managing the boundary of the woodland and any likely increased access, proportionate to the degree of likely future access, planned or unplanned.

We would expect to see hedgerows and individual trees within a development site considered in terms of their overall connectivity between woodlands affected by the development.

On sites with no public access and where no risk is presented to the highway, 'veteranisation' of selected existing mature trees may prove worthy of consideration potentially providing benefit to a variety of species including woodland bats, invertebrates associated with dead and decaying wood and fungi.

## Climate Change

[The Woodland Carbon Code](#) is the voluntary standard for UK woodland creation projects where claims are made about the carbon dioxide they sequester. The scheme provides independent validation and verification providing assurance and clarity about the carbon savings of sustainably managed woodlands. To offset the emissions of the link road construction phase, would require about fifty hectares of woodland to be created. This is achievable for the link road project and the Forestry Commission would be like to help advise and support such an initiative.

If you have any queries regarding our response, please do not hesitate to contact me.

Yours sincerely



James Anderson-Bickley MICF, MRICS

Local Partnership Advisor for the North West & West Midlands Area Team,



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