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Area Director
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By email only

Date: 10th December 2025

Dear Sir/Madam,

Ref: EN010162 – Great North Road Solar and Biodiversity Park

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on the trees and woodland identified in this proposed application. As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather, we are providing information on the potential impact that the proposed development could have on woodland. The Forestry Commission is pleased to provide you with the following information that may be helpful when you consider the application:

- Details of Government policy relating to ancient woodland, and ancient, and veteran trees
- Information on the importance and designation ancient woodland, and ancient, and veteran trees
- Details of Government policy relating to non-ancient woodland and trees

Ancient Woodlands (ASNW/PAWS) and Ancient, and Veteran Trees (AVT)

Ancient woodlands, and ancient, and veteran trees, are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed, including immensely complex ecological processes and relationships, above and below the ground. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS) and ancient, and veteran trees (AVT).

Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states:

"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 and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."

We would 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 "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The joint Natural England and Forestry Commission Standing Advice on Ancient Woodland advises that the size and type of buffer zone should vary depending on:

- 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

Whilst the Standing Advice advises that buffer zones should be at least 15m from the boundary of the woodland, it states that where assessment shows impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. Considering the scale and type of the proposed development, the character of the area, and that the area is not densely wooded, but consists of an ecological network of ancient woodland habitats and other priority deciduous woodland habitats, a 15m buffer zone is likely to be insufficient to ensure no loss or deterioration of ancient woodland habitats. The Standing Advice and the recommended buffer zones are currently under review and are likely to be updated recommending that the minimum buffer zone requirement be increased.

When assessing impacts to ancient woodlands, there is a need to consider both the direct and indirect impacts of the development. Direct impacts can include, but are not limited to, damaging or compacting soil, damaging functional habitat connections and changing the woodland ecosystem by removing the woodland edge or thinning trees.

Indirect impacts can include reducing the amount of semi-natural habitats next to or ecologically connected to, ancient woodlands, reducing the ability of fauna, such as bats and invertebrates to feed in the areas surrounding the ancient woodlands, increasing the amount of dust, light, air or soil pollution, changing the landscape character of the area or severing habitat connections, which is a known cause of habitat degradation and biodiversity decline.

Due to the irreplaceable nature of ancient woodlands and ancient, and veteran trees, most temporary effects will result in permanent harm.

Biodiversity

The mitigation hierarchy as referenced in the National Policy Statement for Renewable Energy Infrastructure (EN-3), has as its first principle, the avoidance of harm to biodiversity. Whilst we recognise that the applicant has committed to providing a biodiversity net gain (BNG) uplift of 11% voluntarily, ahead of the introduction of BNG requirements for NSIPs, the presence of irreplaceable ancient woodland habitats, means that avoiding biodiversity loss within these habitats must be the priority.

The ancient woodland Standing Advice specifically highlights development scale and type as considerations when assessing an appropriate buffer zone, to avoid loss or deterioration to ancient woodland. The minimum buffer zone of 15m may be sufficient for small scale development in proximity to ancient woodlands, but for large scale developments, set within complex and sensitive networks of irreplaceable, semi-natural and priority habitats, the advice points to larger buffer zones likely being needed.

Summary

What is most important to the Forestry Commission in this case is that there will be no loss or detrimental impact as a result of this proposed development on ancient woodland, and ancient, and veteran trees. We hope these comments are helpful to you. We look forward to hearing from you with regards to any future planning applications for this site. If you

have any further queries or would like a follow up meeting to discuss this application, please do not hesitate to contact the Forestry Commission on the email address provided above.

Yours faithfully,

██████████, Local Partnership Advisor
Yorkshire and North East Team