

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 trees and woodland, and the benefits that could be gained by incorporating trees and woodland into the development.

Ancient woodlands, ancient trees and veteran trees, 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), Plantations on Ancient Woodland Sites/Ancient Replanted Woodland (PAWS/ARW), ancient trees and veteran trees (AVT).

It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, ancient trees and veteran trees, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 186c). It is not possible to fully compensate for the loss of an irreplaceable habitat.

The Forestry Commission notes that a 15m buffer is proposed for the ancient woodlands identified as being at risk of impacts from the proposed development. The Forestry Commission and Natural England Standing Advice for making planning decisions relating to ancient woodland, details some of the potential direct and indirect impacts on ancient woodland resulting from development.

The Standing Advice highlights that deterioration of ancient woodlands can occur due to damaging functional habitat connections, reducing the amount of semi-natural habitats next to ancient woodlands, increasing disturbance to wildlife and changing the landscape character of an area.

While a 15m buffer may be sufficient to avoid impacts, the size and type of buffer zone required to ensure no deterioration of ancient woodland habitat should be based upon an assessment of the specific potential impacts on each ancient woodland. 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, and the character of the surrounding area. Larger buffer zones are more likely to be needed if the surrounding area is less densely wooded.

Where possible buffer zones should contribute to wider ecological networks and form part of the green infrastructure of the area. Buffer zones should consist of semi-natural habitats such as woodland, or a mix of scrub, grassland, heathland and wetland, and should include creating habitat with local and appropriate native species within the buffer zone.

There are many small areas of priority habitat woodland in the landscape, in addition to several ancient woodlands, within 250m of the proposed order limits. Fragmentation is one of the greatest threats to woodlands. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity. This should be a consideration when assessing the impacts from the proposed development on those ancient woodlands and priority habitat woodlands, as well as when considering appropriate mitigation and biodiversity enhancement measures.

Government policy strongly supports increasing tree and woodland cover in England, including commitments to:

- Reach 16.5% tree and woodland cover in England by 2050 (Tree Action Plan for England)
- Increase woodland creation rates to support net zero and biodiversity objectives
- Deliver landscape-scale nature recovery through the Environmental Improvement Plan 2023
- Contribute to the England Trees Action Plan ambition to expand woodland creation and tree canopy cover

Under Section 40 of the Natural Environment and Rural Communities Act 2006, as amended by the Environment Act 2021, public authorities exercising functions in relation to England (including under the planning system) must consider what action they can properly take to further the conservation and enhancement of biodiversity and take appropriate action consistent with the proper exercise of their functions.

Consideration should be given to the Environment Act 2021 biodiversity targets, including the statutory targets to:

- Halt the decline in species abundance by 2030
- Increase species abundance so that by 2042 it is greater than in 2022, and at least 10% greater than 2030
- Improve the Red List Index for England species extinction risk by 2042, compared to 2022 levels
- Restore or create in excess of 500,000 hectares of wildlife-rich habitats outside of protected sites by 2042. A new interim target was also set within the EIP23 to restore or create 140,000 hectares of a range of wildlife-rich habitats outside protected sites by 2028

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact the Forestry Commission on the email address provided.