Forestry Commission

Forest Services
East & East Midlands
Santon Downham
Brandon
IP27 0TJ

Tel 0300 067 4574
eandem@forestrycommission.gov.uk

Area Director: [redacted]

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Re: FUL/2024/0022– Norwich Western Link

Thank you for consulting the Forestry Commission on this project.

As the Governments forestry experts, we endeavor to provide relevant information to help the project to reduce impact on irreplaceable habitats such as ancient semi-natural woodland as well as other woods and trees.

Ancient Woodland – An Irreplaceable Habitat

The Environmental Statement, Chapter 2: 'The Existing Site', paragraph 10.2 notes that there are two parcels of ancient woodland within 200m of the red line boundary: Primrose Grove and Mouse Wood. Mouse Wood directly abuts Old Covert and the route bisects The Water Fence. Given the prevalence of ancient woodland in the area it is very likely that these woodlands and others in the area are in fact ancient. Following recent research by the Norfolk Wildlife Trust, North Wood adjacent to Primrose Grove has also been designated as an ancient woodland and will be listed on the updated Ancient Woodland Inventory (AWI).

We have assessed the route map and have concluded that currently we can only give a holding response for the proposal's impact upon ancient woodland as the AWI for Norfolk is due to be updated in January 2025. Norfolk County Council were contacted in July and August 2024 and confirmed that this work could not be bought forward. As this is a 'Regulation 3' application we expect that Norfolk County Council will follow best practice and consider the updated AWI as a material consideration as soon as it becomes available. It is worth noting that any revision of the AWI is very likely to impact upon the scheme's Biodiversity Net Gain contribution. If the woodland is not ancient, then it may be 'long established' which is defined in the 'Keepers of Time: ancient and native woodland and trees policy in England' as:

'Long established woodland has been present since at least 1893. While not ancient, these woodlands are still very important. They have had many decades to develop rich biodiversity and they often contain important old-growth features and deliver a range of ecosystem services'.

As stated in the National Planning Policy Framework (NPPF) (December 2023): Para 186: 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 and a suitable compensation strategy exists;"

The Joint NE/FC Standing Advice on Ancient Woodland states that both the direct and indirect effects of development should be considered for both the construction and operational phases of the proposed development.

The proposed scheme is 3.8-mile dual carriageway road, this is a very significant and is not limited to the carriageway itself, the development will cause multiple impacts upon nearby ancient woodland.

For example, the effect of air pollution from a road development such as this will result from a significant increase in traffic.

- Chemical effects
    - Road salt application, together with nitrogen from vehicle exhausts, has been shown to significantly alter the species composition and abundance of ground flora in woodland alongside roads in Germany (Bernhardt et al. 2004).
    - Airborne sodium chloride is known to cause leaf injury to trees over 100m from roads, particularly in down-wind and down-slope directions (Forman & Alexander 1998).

- Disturbance
    - Large roads are directly linked to increased animal deaths.
    - Noise pollution disturbs wildlife and leads to disturbances in breeding and community make up, as referenced in Natural England's objection to the proposal due to its impact upon Barbastelle Bats (ref 20240819).

Bisecting and isolating ancient woodland reduces the resilience of the woodland and makes it more vulnerable to these cumulative effects. With a smaller area to perimeter ratio the woodland becomes more vulnerable to the negative impacts of adjacent land use. Isolating woodlands leads to inevitable species loss

Lowland Mixed Deciduous Woodland – A priority habitat

There are several areas of Lowland Mixed Deciduous woodland within the site area and 7 will be directly impacted. Lowland Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognised under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Even if parts of the woodlands were to be retained, woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic, particularly during the construction phase of a development.

A scheme that bisects woodland will not only result in significant loss of woodland cover but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation and have a huge negative impact on the ability of the biodiversity (flora and fauna) to respond to the impacts of climate change.

Ancient and Veteran Trees

We have also noted that there are numerous veteran and ancient trees located within the redline boundary and that 7 will be lost directly due to the works. The Norfolk Wildlife Trust are undertaking an assessment of veteran and ancient trees along the route which may be useful in providing further information to inform the design.

Ancient and veteran trees are irreplaceable habitats. The NPPF defines them as:

'A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage'.

The Environmental Statement recognises this definition (Chapter 10: Biodiversity Appendix 10;35: Arboricultural Impact Assessment) and the Planning Statement (para 5.5.32) states:

The residual effect on ancient and veteran trees is a major adverse effect that remains significant following the implementation of compensation measures.

A 3 for 1 replacement ratio has been proposed for veteran trees. These are irreplaceable habitats, and compensation is a last resort. We would normally expect a much higher compensation ratio to acknowledge the significance of this loss.

Habitat Restoration and Mitigation Planting

We note the habitat restoration plans for Primrose Grove in the Air Quality Compensation Strategy. Whilst this approach is to be welcomed, we would like to see a detailed method statement for the restoration of Plantations on Ancient Woodland Sites. For example, there is no mention of the time that will be taken to remove the non-native trees, this should be done slowly to ensure that light levels do not change too drastically as this would allow species such as nettle and bramble to quickly dominate rather than native tree species to regenerate slowly.

We note the plans for the planting of new native woodland. However, the scale of the planting could go further to acknowledge the impact on the surrounding ancient woodland. For example, on High Speed 2 Natural England supported a 30:1 ratio of new woodland to ancient woodland lost. Whilst it is acknowledged that there is currently no direct loss of ancient woodland the impacts upon 3 ancient woodlands will be significant and this should be recognised in the mitigation planting.

In addition, with the Government has an aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050. The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss.

There may be the opportunity to create some larger woodland blocks to increase connectivity and biodiversity across the wider site area, especially in the areas adjacent to the woodland blocks outside the red line boundary. We note that there may be opportunities to secure more land for planting outside the red line boundary and would urge that this opportunity is taken.

The biosecurity of all planting stock needs to be considered to avoid the introduction of pests and diseases. Woodlands need to be climate, pest and disease resilient. Plans should also be in place for the long-term management and maintenance of any new woodland, with access needing to be considered for future management.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Yours sincerely

[redacted] MRTPI
Partnership and Expertise Manager