



Norfolk County Council
Planning Services
County Hall
Martineau Lane
Norwich
NR1 2DH

19th August 2024

Dear Planning Team,

Reference: FUL/2024/0022

Proposal: Development of approximately 6km of the Norwich Western Link Road connecting the A1067 (Fakenham Road) with the new A47 North Tuddenham to Easton scheme (being developed by National Highways), including the construction of a new roundabout junction with the A1067 Fakenham Road, improvements to the A1067 Fakenham Road and the roundabout junction with the A1270 Broadland Northway. Structures include a new viaduct carrying the Norwich Western Link over the River Wensum, a new underpass at Ringland Lane, the provision of a green bridge carrying the Broadway over the Norwich Western Link, three further green bridges, wildlife crossings, and culverting of a tributary to the River Tud. Related works include the stopping up, diversion, improvement and provision of side roads, new walking cycling and horse-riding provision, the stopping up, replacement and provision of new private means of access, and ancillary landscaping, ecological mitigation, surface water drainage system, flood compensation, bunds, other environmental mitigation, diversion and protection of apparatus and temporary works to facilitate construction, and the change of use of the premises known as Low Farm as offices (class E), and other ancillary works. | Land between the A1270 Broadland Northway near Ringland and the A47 near Honningham

Objection – loss and deterioration of ancient and veteran trees and ancient woodland

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 consultation.

Woodland Trust Position

The Trust **strongly objects** to this planning application on account of significant adverse impacts on ancient and veteran trees, including direct loss and deterioration, and also the deterioration and potential loss of ancient woodland.

We note the provision of information relating to arboricultural matters throughout this application, though we have some contentions with conclusions made relating to designation

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of trees and therefore the overall assessment of impact on ancient, veteran and notable trees. This is further addressed in a below section in which we have detailed the ancient, veteran and notable trees we consider will likely be impacted. We have identified the ATI trees we consider to be affected in Annex 1 at the foot of this document.

We are also concerned by the potential for impact on ancient woodland, including Primrose Grove (grid ref: TG 13051 15136) and a newly designated ancient woodland area (grid ref: TG 13258 15175).

Ancient and Veteran Trees

Ancient and veteran trees are irreplaceable habitats and afforded a high level of protection in planning policy. Ancient and veteran trees possess unique features which provide a rich and diverse range of habitats, playing host to countless other species. In particular, many rare invertebrate, fungi and lichen species are dependent on the decaying wood provided by such trees¹. They are also an essential part of our landscape and cultural heritage.

Government's 'Keepers of Time' policy expresses the importance of ancient and veteran trees: *"Ancient and veteran trees are rich in biodiversity. They provide food, shelter and breeding sites to large numbers of species including birds, bats, fungi and insects, which are often restricted in their distribution. They can be found both inside and outside of woodlands."*

The National Planning Policy Framework (NPPF) defines an ancient or veteran tree as: *"A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value"*. It does not provide a separate definition for ancient trees and veteran trees.

Natural England and Forestry Commission's standing advice for ancient woodland, ancient trees and veteran trees² does, however, provide separate definitions for ancient trees and veteran trees. Regarding ancient trees it states: *"An ancient tree is exceptionally valuable. Attributes can include its: great age, size, condition, biodiversity value as a result of significant wood decay and the habitat created from the ageing process, cultural and heritage value. Very few trees of any species become ancient."*

Regarding veteran trees it states: *"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. All ancient trees are veteran trees, but not all veteran trees are ancient. The age at which a tree becomes ancient or veteran will vary by species because each species ages at a different rate."*

The Planning Practice Guidance (PPG) for Natural Environment³ provides additional clarity on the status of ancient and veteran trees. It states: *"Ancient trees are trees in the ancient stage of their life. Veteran trees may not be very old but exhibit decay features such as branch death or hollowing. Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species."*

¹ <https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf>

² <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

³ <https://www.gov.uk/guidance/natural-environment>

The most recent Government publication relating to ancient and veteran trees comes in the form of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024⁴. Within this legislation is a definition for ancient and veteran trees, which states the following:

“Ancient and veteran trees can be found as individual trees or collections of trees in any setting. Ancient trees have passed beyond maturity into an ancient life stage or are old in comparison with other trees of the same species which exhibit one or more of the following—
(i) demonstrably great age relative to others of the same species
(ii) changes to their crown and trunk development indicative of the ancient life stage

“Veteran trees are mature trees that share physical and other characteristics in common with ancient trees, due to their life or environment, but are neither developmentally nor chronologically ancient. All ancient trees are veteran trees, but not all veteran trees are ancient. Veteran and ancient trees which have died are still recognised as such because they retain significant biodiversity value for many decades. Veteran trees exhibit one or more of the following—
(i) significant decay features such as deadwood, hollowing or signs of advanced decay in the trunk or major limbs
(ii) a large girth, depending on and relative to species, site and management history
(iii) a high value for nature, especially in hosting rare or specialist fungi, lichens and deadwood invertebrates”

It is clear from the above policies and guidance published since the NPPF that there is a particular emphasis on separating out the characteristics of size, age and condition so that not all three characteristics need to be present for veteran status.

Many ancient and veteran trees are recorded on the Ancient Tree Inventory (ATI). Established in 2003, the ATI is a tree-recording partnership between the Tree Register, the Ancient Tree Forum and the Woodland Trust. Ancient and veteran trees are recorded, measured, photographed and made accessible on an interactive map. The ATI is a living database almost entirely populated by volunteers. Although much progress has been made, the ATI is currently incomplete, and it is estimated that the vast majority of ancient and veteran trees within the UK remain unrecorded. This highlights the necessity of project-level mapping to assess for the presence of ancient and veteran trees. We do also recognise that ATI records are not always locationally-precise and would encourage engagement with the Trust where this is found to be the case.

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 advice⁵:

“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:

⁴ [The Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024 \(legislation.gov.uk\)](https://www.gov.uk/guidance/biodiversity-gain-requirements-irreplaceable-habitat-regulations-2024)

⁵ <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”*

We are aware that an area of previously unmapped ancient woodland has recently been added to the Ancient Woodland Inventory (AWI) by Natural England. As such, this wood must be considered against the same policy and guidance as other areas of ancient woodland that have been mapped for a long time. We ask that the applicant engages with Natural England on this matter to both understand the impact of the scheme on ancient woodland, both existing and newly mapped.

Planning Policy

The National Planning Policy Framework (NPPF), paragraph 186, 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;”

Footnote 67 defines exceptional reasons as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

There is **no wholly exceptional reason** for the loss and deterioration of ancient and veteran trees and ancient woodland along the route of this scheme and as such we consider that this proposal does not comply with national planning policy.

Further to this, paragraph 180 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 ancient woodland or ancient and veteran trees, net gain for biodiversity cannot be achieved.

The Trust supports an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country’s biodiversity and climate crises. The value of woodland in sequestering carbon emissions has been recognised by Government, yet further erosion of ancient and mature woodland by road projects (led at both a local and central level) would further undermine the Government’s ability to meet net zero obligations.

The UK Committee on Climate Change (CCC) reports that transport emissions increased by 6% between 2013 and 2019 and were 4% higher than in 1990. Road transport accounts for 91% of the UK’s domestic surface transport emissions. Although vehicles have become more fuel efficient, this has been offset by increasing travel demand. To overcome such trends, the CCC Net Zero report highlighted the need for new policy frameworks to be developed. The Department for Transport acted on this recommendation, publishing a Green Paper, *‘Decarbonising transport - setting the challenge’*, in March 2020. This includes recognition that *“We will use our cars less and be able to rely on a convenient, cost-effective and coherent*

public transport network." The Government has further committed to tackling the issue by the publication of *'Decarbonising Transport - A Better, Greener Britain'* in July 2021. A successful strategy to reduce transport's carbon emissions must include measures to manage road travel demand, not accommodate its growth, and we would challenge whether the Norwich Western Link scheme is consistent with this approach.

Impacts on Ancient, Veteran and Notable Trees

The Norwich Western Link scheme, as proposed, would have a majorly significant adverse impact on ancient, veteran and notable trees. We note that the applicant has sought to identify such trees along the route of the scheme by means of tree surveys and an arboricultural impact assessment, however, we have significant concerns that large numbers of such trees have not had their ecological value recognised and have therefore been misidentified.

When the proposed route is compared to the Ancient Tree Inventory (ATI)⁶, it is evident that numerous ancient, veteran and notable trees have not been recognised within the applicant's provided Arboricultural Impact Assessment. Within this same document, it is detailed that the following veteran trees have been identified for removal to accommodate the proposed scheme: *'T20; T49; T77; T82; LG138; LG141; and T220'*. This represents the loss of seven veteran trees. This document does not go on to clarify how many additional veteran trees might be subject to deterioration where features of the scheme or construction works are to take place within proximity of such trees.

In conducting a review of the route and the general arrangements of the scheme and comparing these documents to the ATI, it is apparent that there is a clear discrepancy between what the applicant considers to be an ancient, veteran or notable tree and what is recorded on the ATI. In undertaking an assessment of the ATI against the mapping provided for the scheme, we identified 87 trees that we believe to fall into the category of ancient, veteran or notable and that are likely to be impacted by the proposals. In total we consider there to be six ancient trees, 56 veteran trees, and 25 notable trees that have the potential to be either subject to deterioration or loss. Within Annex 1 at the foot of this document, we have detailed these trees, their ATI number, species, designation, location, and what we believe to be the impact on them individually.

We have not yet been able to make comparisons between the ATI and the applicant's own tree surveys. We do recognise that on occasion some locational information about such trees is not completely precise, though we would have expected the applicant to have identified where the trees they surveyed themselves likely correlate with any ATI records. We expect that some records on the ATI have been added since the application was submitted, and as such we would ask that the applicant undertakes an assessment of any records on the ATI to make a comparison to their own surveys and records. Considering that the ATI is recommended by Natural England and Forestry Commission as a tool for identification of the presence of such trees, we strongly suggest that the applicant needs to revisit the impacts on ancient, veteran and notable trees.

We have also undertaken an assessment of trees recorded by the applicant. In going through the tree survey and the details provided for trees along the route, we have determined that there are approximately 64 trees within the applicant's tree survey that are likely contenders for veteran status but do not appear to have been recognised as such. This is based on the details for such trees indicating that there are veteran features present (and as such likely

⁶ <https://ati.woodlandtrust.org.uk/>

significant decay features) and in some cases trees with a large stem diameter/girth that would indicate they likely fall within the size range for veteran or ancient status.

Ancient, veteran and notable trees can be impacted by the scheme directly, through the direct removal and loss of such trees and removal of veteran features; or indirectly, which can occur through impacts on trees' rooting environments and root systems, as well as long-term threats to their retention / increased need for management and sanitisation of veteran features. From our assessment, we consider that the scheme could necessitate the **direct loss of approximately 32 veteran (inc ancient) trees and potentially up to 53 veteran trees**. We also consider that up to **18 notable trees could also be lost** to facilitate the scheme.

The remainder of the trees we have identified are likely to be subject to some form of deterioration as a result of the construction of the scheme, whether that's from root encroachment or the creation of new infrastructure / works within their vicinity that would threaten their long-term retention, i.e. the creation of new landscaping or new bridleways / footpaths.

It is essential that no ancient or veteran trees are lost as part of the development. The loss of any such tree can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Veteran tree habitat is associated with specialist wood decay fungi and invertebrates, as well as birds, bats and other small mammals. The larger the concentration of old trees in an area and the longer they have been present on site, the richer the variety of species found. Where there is a large population of veteran trees within close proximity, as in this case, there is a greater likelihood of rare species associated with decaying wood habitat, aging bark and old root systems. As such, the likely impacts on ancient, veteran and notable trees from this scheme will have a majorly significant adverse impact on the wider veteran tree population and the wildlife species (often specialist, rare and threatened species) that rely on them as a whole.

While it is important to protect the vitality of ancient and veteran trees by avoiding their loss and providing suitable buffer zones, thought must be given to the species associated with them also. Utilised by an abundance of different wildlife species, many of which are reliant on ancient and veteran trees for their survival, it is vitally important that the ability of such trees to host these species is not adversely affected. For example, greater need for management of such trees where the scheme creates greater proximity to people and vehicles can affect deadwood retention, and increased dust and nitrogen pollution can affect their ability to host important bryophytes and epiphytes (lichens are particularly sensitive to air pollution). It is important that such considerations have been made. At present, we do not consider that such measures have been adequately addressed by the documentation provided.

We would also appreciate clarification from the applicant as to how conclusions were reached in determining ancient, veteran and notable status of trees along the route as this will be significant in determining why there are discrepancies between the applicant's own records and the ATI.

At this moment in time, we consider that the scheme in its present form will have significant and unacceptable impacts on ancient, veteran and notable trees, with large losses and significant deterioration from both construction activity and further deterioration in the operational phase of this scheme. We consider that the designation of such trees has not been adequately recognised and therefore the true extent of impact has not been revealed within the application documentation. We consider that much greater engagement with the

ATI is required to determine the real impact of this scheme on ancient, veteran and notable trees.

Impacts on Ancient Woodland

The Norwich Western Link scheme appears to impact mainly only two areas of ancient woodland. Firstly, we are concerned that the scheme passes in close proximity to Primrose Grove and would have adverse impacts on the ancient woodland and the wildlife that inhabits it. Secondly, we are aware that Natural England is due to add an additional area of woodland to the Ancient Woodland Inventory and that this woodland would be located in very close proximity to the scheme, resulting in potential loss and almost certainly deterioration. However, it will be difficult for us to comment further on this newly added ancient woodland until we have seen reports from Natural England and can determine where the ancient woodland boundary would exactly be.

We are specifically concerned about the following impacts to ancient woodland:

- Potential for direct loss of ancient woodland, namely within the newly designated section. Such loss may come in the form of direct loss of trees, loss of ancient woodland soils, removal of other types of habitats and overall loss of available habitat.
- Permanent fragmentation due to the removal of adjacent semi-natural habitats, such as other small wooded areas, hedgerows, individual trees and wetland habitats, as well as separation of ancient woods and non-ancient woods from each other.
- Significant noise and dust pollution impact to woodlands within close proximity of the road and other required infrastructure.
- Adverse hydrological impacts would occur where the introduction of hardstanding areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants into the woodland, affecting the hydrological condition of the woodland and triggering change to soil characteristics and floral composition.
- Increased traffic emissions resulting in increased deposition of nitrogen and other pollutants which affect the condition of ancient woodland.
- Root damage to woodland boundary trees during construction.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. The Trust is concerned that there will be serious impacts to the newly mapped ancient woodland, as well as surrounding areas of retained woodland, particularly from increased noise and light pollution from traffic as well as dust pollution during both construction and operation of the proposal. The woodlands will also be subjected to increased nitrogen oxide emissions from vehicles, which can change the character of woodland vegetation (in terms of species composition) through altering nutrient conditions⁷.

We are concerned about potential detrimental impact to Primrose Grove and the newly mapped ancient woodland from the proximity to the proposed scheme. The close proximity of a dual carriageway will lead to numerous adverse impacts as described above during both construction and operation of the proposed scheme.

⁷ Sheate, W. R. & Taylor, R. M. (1990) The effect of motorway development on adjacent woodland. *Journal of Environmental Management*, 31, pp. 261-267

Natural England and Forestry Commission have identified impacts of development on ancient woodland or ancient and veteran trees within their standing advice (please see Annex 2 at the foot of this document for the full range of impacts outlined). This guidance should be considered Government's position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this application.

At present, we consider the scheme's potential impacts on ancient woodland to be unacceptable and consider that the applicant will need to engage further with Natural England regarding the newly mapped area of ancient woodland due to be added to the inventory, prior to any form of decision being made.

Mitigation for Impacts on Irreplaceable Habitats

Ancient, veteran and notable trees

Trees are susceptible to change caused by construction and development activity. As outlined in 'BS 5837:2012 - Trees in relation to design, demolition and construction' (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

Paragraph 5.2.4 of BS 5837 guidelines states that "*particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development*" and that "*adequate space should be allowed for their long-term physical retention and future maintenance*".

Veteran trees are irreplaceable habitats and should be protected from loss, deterioration or harm. Natural England and Forestry Commission have identified impacts of development on ancient and veteran trees within their standing advice. In particular, the standing advice states that:

"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***"

Whilst BS 5837 guidelines state that trees should have a root protection area of 12 times the stem diameter (capped at 15m), the guidelines also recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. The standing advice states the following with regards to root protection areas/buffer zones: "*For ancient or veteran trees (including those on the woodland boundary), the **buffer zone should be at least 15 times larger than the diameter of the tree**. The buffer zone should be **5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter**. This will create a minimum 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.*"

As we consider that the applicant has not appropriately identified veteran trees within the scheme boundary, there will likely be significant deterioration of such trees from encroachment on root systems and rooting environments. This will most likely occur where the applicant has misidentified a veteran tree and not afforded it the required 15 times stem diameter buffer zone, instead only affording it the 12 times stem diameter or capped 15 metre RPA. By capping the RPA, the full root spread of the veteran tree has not been accounted for within the development proposals, and damage to the veteran tree roots is likely to occur.

All veteran trees on site should be afforded an un-encroached buffer zone in line with the aforementioned standing advice. No development works should be undertaken within this area to ensure no detrimental impact to the roots of veteran trees will occur during the development.

Notable trees are recognised as those that do not yet hold the same level of ecological value as ancient or veteran trees, but they have significant value for the local community and are likely to become veteran specimens if afforded appropriate space to grow and develop. Although notable trees may not represent the same level of value as ancient or veteran trees, they are likely to become veteran specimens if afforded appropriate space to grow and develop and as such they should still be identified, retained and afforded suitable buffer zones.

Whereas the typical 12 times stem diameter, as suggested in BS 5837 guidelines, should ensure that such trees have the minimum space required to maintain vitality, it does not necessarily account for the rooting space needed in the future growth of larger mature trees. Paragraph 5.2.4 of BS 5837 guidelines states that “**particular care is needed regarding the retention of large, mature, over-mature or veteran trees** which become enclosed within the new development” and that “**adequate space should be allowed for their long-term physical retention and future maintenance**”. Therefore, we consider that notable trees should be afforded a buffer zone amounting to 15 times the stem diameter, as recommended for ancient and veteran trees in Natural England and Forestry Commission’s standing advice for ancient woodland and ancient and veteran trees.

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’s standing advice also provides guidance on mitigation measures to alleviate impacts to ancient woods and trees (please see Annex 2 at the foot of this document).

Additional mitigation approaches are also outlined in our Planners’ Manual⁸:

- 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.
- Sympathetic design and use of appropriate lighting to avoid light 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.

⁸ <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

It is important that for any scheme that would bring new road infrastructure within close proximity to ancient woodland areas, that appropriate buffer zones are considered and implemented. Where loss of ancient woods may occur, such as the area of potentially unmapped ancient woodland, the only appropriate form of mitigation is avoidance.

In this instance we consider that the proposed scheme is likely to have considerable indirect impacts in the form of dust, noise and light pollution, traffic emissions, hydrological impacts, as well as potential damage to tree roots. Therefore, a **buffer zone of at least 50 metres** to all areas of ancient woodland should be incorporated into the design plans to prevent long-term degradation of the ancient woodland habitat. If this is not achievable, then the scheme should not be taken forward in its present form.

The buffer zone should be kept free of development unless the proposed works would aid in further alleviating impacts on the ancient woodland, i.e., in the form of barriers, fencing, bunds, or embankments. In the case of the aforementioned features, it is important that such works remain 15m away from the ancient woodland, not only to prevent impacts on the root systems of the trees that make up the woodland edge, but also to prevent other indirect impacts associated with construction works. To this end, we recommend that the buffer zone is planted prior to construction, to create a phased habitat to the ancient woodland that absorbs the indirect impacts occurring during the construction and operational phase.

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.


Conclusion

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

In summary, the Woodland Trust **strongly objects** to this application on the basis of significant loss and deterioration of a large number of ancient, veteran and notable trees (possibly up to 87 such trees), as well as the deterioration and potential loss of ancient woodland. We consider that this scheme will have considerable impacts on irreplaceable habitats and is therefore unacceptable in its current form. The significantly adverse impacts on these habitats are in direct contravention of national planning policy and as such, this scheme should be refused on the grounds it does not comply with government policies and guidance designed to protect irreplaceable habitats.

We hope you find these comments helpful - if you would like clarification or further advice, please contact us at planningcasework@woodlandtrust.org.uk.

Yours sincerely,

 Dip Arb L4 (ABC)
Programme Lead – Woods Under Threat

Annex 1:

Section	ATI Ref No. & Species	Designation	Grid Reference	Impacts
East of Old Covert	219510 – Oak	Veteran	TG0994712759	Deterioration, potential loss
	219498 – Oak	Veteran	TG0994112852	Deterioration, potential loss
Crossing of 'The Broadway'	263172 – Oak	Veteran	TG1074413798	Deterioration
	263171 – Hornbeam	Veteran	TG1079813795	Deterioration
	263169 – Hornbeam	Veteran	TG1082413794	Deterioration
	219950 – Sycamore	Notable	TG1083513791	Deterioration
	219549 – Beech	Notable	TG1084713773	Deterioration
	263168 – Hawthorn	Veteran	TG1097613780	Potential loss
	263167 – Wild apple	Veteran	TG1099013779	Potential loss
	263165 – Oak	Veteran	TG1099713774	Potential loss
	263162 – Oak	Veteran	TG1100113774	Potential loss
	261939 – Oak	Veteran	TG1106113756	Potential loss
	263160 – Hawthorn	Veteran	TG1107313760	Potential loss
	263161 – Sycamore	Notable	TG1107313753	Potential loss
	261938 – Field maple	Veteran	TG1110613735	Potential loss
	261937 – Oak	Veteran	TG1112213740	Potential loss
	261936 – Ash	Veteran	TG1114513731	Potential loss
	219527 – Sweet chestnut	Veteran	TG1116113715	Potential loss
	261932 – Sycamore	Veteran	TG1118513716	Potential loss
261933 – Wild apple	Notable	TG1124413697	Potential loss	
Church Hill Lane (Western Road) Crossing	262183 – Hazel	Veteran	TG1165414257	Potential loss
	262174 – Field maple	Ancient	TG1166914271	Potential loss
	262175 – Field maple	Ancient	TG1167314274	Potential loss

	262176 – Blackthorn	Ancient	TG1168014279	Potential loss
	262177 – Oak	Notable	TG1176414323	Potential loss
	261040 – Oak	Veteran	TG1172114376	Deterioration, potential loss
Land North of Western Road	261117 – Ash	Notable	TG1197414708	Deterioration
	261116 – Field maple	Notable	TG1200214675	Deterioration, potential loss
	261115 – Field maple	Veteran	TG1200914666	Deterioration, potential loss
	261114 – Field maple	Veteran	TG1202114651	Potential loss
	261113 – Field maple	Veteran	TG1202514646	Potential loss
	261112 – Wild apple	Veteran	TG1201514624	Potential loss
	261110 – Wild apple	Veteran	TG1200814618	Potential loss
	261109 – Holly	Notable	TG1197114571	Potential loss
	261108 – Ash	Veteran	TG1198414558	Potential loss
	261107 – Oak	Notable	TG1202414528	Deterioration, potential loss
	261106 – Oak	Veteran	TG1203314521	Deterioration, potential loss
	261105 – Oak	Notable	TG1211414465	Deterioration, potential loss
	Proposed Bridleway And Restricted Byway Through Gravelpit Plantation	261036 – Oak	Veteran	TG1216814422
261037 – Oak		Veteran	TG1218514410	Deterioration, potential loss
261401 – Oak		Veteran	TG1221514393	Deterioration, potential loss
261402 – Oak		Veteran	TG1221914386	Deterioration, potential loss
261403 – Oak		Veteran	TG1223014378	Deterioration, potential loss
261410 – Oak		Veteran	TG1223614376	Deterioration, potential loss
261412 – Oak		Veteran	TG1223914372	Deterioration, potential loss
261413 – Oak		Veteran	TG1224514373	Deterioration, potential loss
261104 – Oak		Veteran	TG1227614527	Deterioration, potential loss
261103 – Oak		Notable	TG1229214583	Deterioration, potential loss
261102 – Oak		Veteran	TG1230714609	Deterioration, potential loss
261101 – Oak		Veteran	TG1231714626	Deterioration, potential loss

	261109 – Oak	Veteran	TG1233214647	Deterioration, potential loss
Through North Section of Gravelpit Plantation	261313 – Oak	Notable	TG1239914876	Potential deterioration
	261315 – Oak	Notable	TG1238314914	Potential deterioration
	219503 – Scot’s pine	Veteran	TG1237414967	Potential loss
	219501 – Spindle	Veteran	TG1237014990	Potential loss
	219500 – Oak	Ancient	TG1237015007	Potential loss
	219524 – Oak	Notable	TG1236615026	Potential deterioration
	219528 – Oak	Notable	TG1241314992	Potential loss
	219537 – Oak	Notable	TG1241714987	Potential loss
	219508 – Hazel	Notable	TG1242714959	Potential loss
	219525 – Oak	Veteran	TG1243214966	Potential loss
	219521 – Oak	Veteran	TG1244614939	Potential deterioration
	219502 – Sycamore	Veteran	TG1245814949	Potential deterioration
Through Long Plantation	261294 – Sycamore	Notable	TG1276915227	Deterioration, potential loss
	261022 – Field maple	Veteran	TG1280015276	Deterioration, potential loss
	263224 – Beech	Notable	TG1275415273	Deterioration, potential loss
	261931 – Field maple	Veteran	TG1279715288	Deterioration, potential loss
North of Primrose Grove	199115 – Field maple	Veteran	TG1305715177	Potential deterioration
	261924 – Oak	Notable	TG1313015278	Potential loss
	261927 – Oak	Veteran	TG1311415284	Potential loss
	261124 – Field maple	Ancient	TG1317515300	Deterioration, potential loss
Through Woodland Area at TG 13247 15181	261400 – Oak	Notable	TG1323415239	Potential loss
	233436 – Oak	Notable	TG1327615146	Potential loss
	233438 – Field maple	Veteran	TG1326715130	Potential loss
	233439 – Oak	Veteran	TG1327315128	Potential loss
	233440 – Oak	Veteran	TG1326115120	Potential loss
	233441 – Oak	Notable	TG1325815117	Deterioration, potential loss

	199473 – Oak	Veteran	TG1327215105	Deterioration, potential loss
	261307 – Ash	Notable	TG1333315228	Potential loss
	261023 – Field maple	Veteran	TG1334715248	Potential loss
	199010 – Field maple	Ancient	TG1335715255	Potential loss
	198101 – Oak	Veteran	TG1339215254	Potential deterioration
	198100 – Oak	Veteran	TG1340515250	Potential deterioration
	198117 – Oak	Veteran	TG1347415216	Potential deterioration
Crossing over the River Wensum	262167 – Oak	Veteran	TG1417815411	Potential loss
	262169 – Oak	Veteran	TG1420215411	Potential loss
	262170 – Ash	Notable	TG1420915391	Deterioration

Annex 2:

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*