



WOODLAND TRUST

**Proof of Evidence pertaining to Ancient Woodland
by the Woodland Trust**

**In relation to the Public Inquiry
into the A6 to Manchester Airport Relief Road Proposals by The Highways Agency**

OBJ/54/01

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1. Introduction

1.1 The Woodland Trust ("the Trust") is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares (50,000 acres) and we have 500,000 members and supporters. The Trust is recognised to be a national authority on ancient woods and trees and protector of the benefits and values that they deliver for society.

1.2 Ancient Woodland (land that has been continually wooded since at least AD1600) is one of the UK's richest habitats, supporting at least 256 species of conservation concern. Ancient woods form a unique link to the primeval wildwood habitat that covered lowland Britain following the last ice age. Ancient woodland sites are irreplaceable – the interactions between plants, animals, soils, climate and people are unique and have developed over hundreds of years. These ecosystems can not be re-created and with only 2% of the land area in Great Britain (1.99% in Stockport District) covered by ancient woodland we cannot afford any more of this finite resource to be lost forever.

1.3 Carr Wood is identified as ancient semi natural woodland (ASNW) on Natural England's Ancient Woodland Inventory (AWI).

2. Policy

National Policy

2.1 National policy advice on biodiversity conservation and planning is provided by the National Planning Policy Framework (NPPF), which states, as one of its key principals, in Section 11 Conserving and enhancing the natural environment:

"109. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity
- where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"

2.2 The NPPF makes explicit reference to the consideration of ancient woodland in paragraph 118: “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”

Natural England Standing Advice

2.3 Natural England states that the following impacts of development within and adjacent to ancient woodland should be taken into consideration:

“Effects from development within ancient woodland:

- Destruction of an area of ancient woodland;
- Loss of whole veteran trees and/ or loss of limbs;
- Ground damage, loss of understorey, and/ or soil and/ or root disturbance, and changes to hydrology from drainage within ancient woodland;
- Damage to archaeological or historical features within ancient woodland or associated with ancient or veteran trees.

Effects from development of adjacent land:

- Fragmentation and loss of ecological connections with surrounding woodland/ veteran trees and the wider natural landscape;
- Effects on the root protection area of individual trees;
- Reduction in the area of other semi-natural habitats adjoining ancient woodland;
- Increased exposure to pollutants from the surrounding area;
- Increased deposition of dust, particularly from quarries, resulting in physical and/or chemical effects;
- Impacts on local hydrology through drainage or water table levels changing;
- Increased public use near veteran trees such that safety works leading to possible damage to the tree may be needed;
- Change to the landscape context for ancient woods and veteran trees;
- Change to light pollution at night (if development includes street lighting).¹ (Natural England Standing Advice for Ancient Woodland and Veteran Trees, published April 2014. Appendix A)

2.4 Natural England also give clear advice on when to consider mitigation of effects and compensation in the “planning balance”:

¹ Natural England Standing Advice for Ancient Woodland and Veteran Trees, published April 2014

*“The irreplaceable nature of ancient woodland and veteran trees means that loss or damage cannot simply be rectified by mitigation and compensation measures. Therefore, where measures seek to address issues of loss or deterioration of ancient woodland or veteran trees, through for instance, attempting to minimise the area of ancient woodland affected (mitigation), or through the provision of replacement habitat (compensation), our advice is that these should be issues for consideration only **after** it has been judged that the wider benefits of a proposed development clearly outweigh the loss or damage of ancient woodland.”²*

3. Value of Ancient Woodland

3.1 Ancient woodland is an irreplaceable habitat and now makes up such a small part of our landscape (approximately 2%) that even small losses may have irredeemable impacts on the flora and fauna found in an area. It is impossible to replicate because many of the species that make up ancient woodland are long-lived and slow growing, do not respond positively to any disturbance and the conditions in which the woodlands formed no longer exist.

3.2 The Trust is pleased that the ES recognises that ancient woodland is an irreplaceable habitat, although it is concerning that it contains a reference to the proposed planting **replacing** the ancient woodland lost in the environmental mitigation chapter (para. 5.14.4). However, Chapter 11 (Nature Conservation) does clearly state that loss of ancient woodland cannot be mitigated for (para. 11.5.6). Although the applicant appears to understand the importance of ancient woodland, the assessment in the ES of the value of ancient woodland varies between local, district and county level. Ancient woodland is an irreplaceable habitat, a fact that is clearly recognised in the NPPF and Natural England’s Standing Advice and therefore it should be regarded as being of national value. Likewise any loss is significant at a national level because it is irreplaceable. The Trust does not agree with the applicant’s assessment that the direct loss of part of Carr Wood is only significant at a local level.

4. Indirect Impacts

4.1 Part of the easternmost extent of the proposed A6 relief road cuts through Carr Wood, an ancient woodland on Natural England’s ancient woodland inventory (AWI). The applicant states that only 0.08ha of ancient woodland will be lost to the scheme. However, it is often wrongly assumed that development can only have an impact on ancient woodland if there is direct loss to the wood. As noted by Natural England, development adjacent to a woodland can cause indirect effects such as changes to drainage, increase in pollution risk, impacts on tree roots and

² Natural England Standing Advice for Ancient Woodland and Veteran Trees, published April 2014

changes to noise and lighting all of which can have a deleterious effect on the woodland ecosystem.

4.2 For example, anthropogenic light pollution is a problem associated with road development and use. Artificial illumination reduces the visibility of the moon and the stars, affects species orientation and may serve to attract or repulse particular species. This affects foraging, reproduction, communication, and other behaviour. It consequently disrupts natural interactions between species. Light pollution near to ancient woodland is, therefore, likely to substantially affect the behaviour of species active during dawn and dusk twilight or nocturnal species, such as moths, bats, and certain species of birds, resulting in the decline of some species. Coupled with the changes to background noise levels in this area if the proposal goes ahead, the Trust considers that the impact on the ecology of the ancient woodland could be significant and long-lasting.

4.3 The Trust is concerned that the applicant makes no reference to the impacts of the operation of a dual carriageway directly adjacent to an ancient woodland that was previously surrounded by fields. As a result of this omission the applicant has offered no mitigation for the potential impacts of the operation of the road on Carr Wood. Whilst the applicant may argue that only a tiny percentage of the ancient woodland is being directly lost to the proposed scheme they have not taken into account the potential on-going deterioration of the woodland ecosystem due to increases in noise, lighting, dust deposition etc.

5. Consultation

5.1 The Woodland Trust initially responded to the SEMMMS consultation in January 2013 (appendix B, please be aware in the initial letter there is a typo and the date should read 2013). We are aware that this was received by the SEMMMS team on 25th January 2013 and passed onto Emma Hughes on 28th January 2013 (Appendix C). Although we did not respond to the application in November 2013 our initial comments should have still be taken into consideration. Although we were not informed by the council it should not be assumed that a lack of comment means no objection.

6. Conclusion

6.1 Ancient woodland is irreplaceable. It is our richest terrestrial wildlife habitat, with complex ecological communities that have developed over centuries, and it contains a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the

resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable to both the direct and indirect impacts of development.

6.2 Although the proposed A6 relief road will result in a small direct loss of ancient woodland from Carr Wood, the proposed road will radically alter the environment directly adjacent to the woodland and this could result in the on-going deterioration of the habitat. This indirect impact has not been addressed by the applicant in their Environmental Statement. For this reason coupled with the direct loss of irreplaceable habitat The Woodland Trust continues to object to the proposed scheme in its current format.