Forestry England

Forestry England's response

Buffer zones

2 of the allocation sites (HA036 Land at Noke Common, Newport and HA039 Former HMP site), are immediately adjacent to Parkhurst Forest which is managed by Forestry England. The woodland at this location is classed as a Plantation on an Ancient Woodland site and part of the forest is also designated a Site of Special Scientific Interest (SSSi). We strongly encourage you to consider a minimum 50m buffer zone around the boundary of proposed development, as well as extra habitat connectivity throughout development sites, as an absolute minimum in order to ameliorate any future negative edge effects (i.e. noise pollution, light pollution, diffuse air pollutants etc.) on our neighbouring land. It is important to reiterate the fundamental purpose for buffer zones is the protection of priority habitats. Therefore these buffer zones should be designed accordingly, with appropriate planting of semi-natural habitats, in order to contribute to wider ecological networks. Subsequently, it is inappropriate for buffers to be utilised for alternative purposes i.e. for walking or cycle trails serving the development, as this can harm habitats through potential littering and trampling. The purpose of the buffer is to safeguard ecological sustainability and therefore it should not have a dual purpose. Furthermore, any green infrastructure provided by the development should be in addition to that of the ecological buffer.

The bulk of the woodlands we manage here in the South Forest District including Parkhurst Forest have been classified as ancient woodland with high proportion of plantation on ancient woodland sites (PAWS), which we are obliged to restore under policy regulations. For further reference to the objectives of Forestry England's woodland management, individual Forest Plans for each area of the nation's public forest are available for public viewing at https://www.forestryengland.uk/forest-planning. These give a detailed plan for each woodland's long-term direction and sustainable management and are a useful starting point for anyone interested in developing land adjacent to land which we manage. In light of this we would like you to consider an appropriate ecological buffer of 50m, taking into account the sensitivities of site specific locations and seeking advice from the relevant authorities. The buffer area must be wide enough to protect the existing and future ecological features and to facilitate the absorption of additional recreational pressure from residents once the proposed housing development have achieved full build-out. The preferred approach is to create new habitat, including native woodland, around existing ancient woodland and linking to nearby woodland sites. This will help reverse the historic fragmentation of this important habitat. The consequent increase in ecological connectivity between areas of ancient woodland will enable the creation of resilient landscapes into the future and help to mitigate climate change.

Consideration of government policy

The local plan or development proposal and associated ecological surveys and assessments should make adequate response to government policy on forests, woodlands and the diverse range of habitats which Forestry England manage, when planning developments directly adjacent to areas of the nation's public forest. All of the below policies are instated in order to protect and conserve the natural environment and in some cases, more specifically, the nation's Ancient and Native Woodlands:

- Keepers of Time (DEFRA & Forestry England, 2005)
- Core Principle of Protect, Improve, Expand (PIE)
- Natural England's Conservation 21 policy (2013)
- A Green Future: Our 25 Year Plan to Improve the Environment (HM Government 2018)
- Open Habitat Strategy (Forestry Commission, 2010)
- Environment Bill (once it has been passed into law)

Consideration of hydrological processes

Development proposals or plans should take necessary considerations of the impact of the proposed development on hydrological processes and the knock on effect on Section 41 (S41) Natural Environment and Rural Communities (NERC) Act 2006 listed habitats and species. Our ability to conserve and enhance these habitats and species could be compromised in the future if appropriate consideration within development proposals has not been taken; soil compaction, flooding, runoff issues and nitrate pollution are all issues that must be considered. Both during the construction process and once the development has underdone completion, strong consideration must be taken into the hydrological processes involved on the site in order to prevent adverse impacts on neighbouring habitats; this duty to conserve biodiversity comes under Section 40 of the NERC Act 2006.

Design and layout of development

It is also worth highlighting that the design and layout of the development site is extremely important when considering the protection of neighbouring ancient woodland and other ecosystems. If residential properties within the development are immediately backing on to the buffer zones or woodland edges, it brings the potential for undesirable garden waste and debris to be deposited on sensitive habitats. This can subsequently lead to the potential risk of non-native invasive species colonisation, as well as unlawful access and encroachment on to the buffer zones over time. Therefore an appropriate land use layout, as well as an adequate management plan, for the development of the areas adjacent to sensitive sites or within close proximity to woodland edges, is essential to minimise the potential risk of increased pollution, littering and further detrimental impacts, such as root damage due to soil compaction or even encroachment on sensitive areas.

Urban, transport and construction activities are also all acute sources of pollution which can bring adverse effects to the ecology and water quality of many catchments and surrounding land, more specifically ancient woodland sites. Therefore significant attention and reference should be made to the layout of the development with regards to the location of access points, green infrastructure and the road network within the development in order to minimise these risks to the neighbouring sensitive ecosystems. These considerations need to be taken into account not just for after the development has achieved full build-out, but also during the construction phase.

Conservation of species and habitat designations

Within the local plan or development proposal, adequate reference to the protection and conservation of designated species and habitats should be made as follows:

- ### Safeguarding for European Protected Species (EPS) and schedule 1 species of bird

  Within planning proposals there must be sufficient recommendations for protection of EPS and Schedule 1 bird species in the neighbouring woodland site and also the wider landscape. This is part of Forestry England's current standard practise under the UK Woodland Assurance Standard (UKWAS).

  An adequate ecological buffer is also necessary to reduce the impact of noise and light pollution on bat roosting and foraging activity. Forestry England would be keen to explore how a more robust ecological buffer can deliver part of the ecological mitigation for the adjoining developments which might take the form of new native woodland, forest meadows and/or localised forest wetland habitats, all of which can play a role in supporting Sustainable Urban Drainage Systems (SUDS). Additional justification for a robust ecological buffer comes in response to the potential for the deleterious effects of airborne pollution from proposed roads and elevated traffic levels more generally. We place great concern on the possible impact of air pollution and subsequently the knock-on effects of a potential reduced invertebrate biomass in the woodland environment and subsequent ramifications for foraging EPS listed woodland bats.

  It should be noted that recommendations to protect individual trees for the protection of bat species would not contribute to offsetting the impacts of new development in the wider landscape.

  The wider landscape must also be considered for the potential presence of dormice. Much research suggests that a larger woodland block can sustain a more viable dormouse population over time. With this in mind one must also consider the potential for the nation's public forests as providing a more robust breeding area

for this EPS listed small mammal in future decades, as our ancient and native woodland restoration programme progresses at a forest scale.

- **Protection and improvement of statutory protected sites**

  Many of our woodlands and wider habitats are protected, by means of certain legislation, under formal conservation designations due to their high natural and cultural importance. These are protected in order to preserve their importance, and to prevent damage and development. The wide range of potential designations which are instated on many of Forestry England's woodlands can include, but is not limited to:

  - Sites of Specials Scientific Interest (SSSIs)
  - Special Areas of Conservation (SACs)
  - Special Protection Areas (SPAs)
  - Ramsar Sites
  - National Nature Reserves (NNRs)
  - Local Nature Reserves (LNRs)

  The natural wildlife and geological features of these designated sites are irreplaceable parts of our national heritage. Subsequently, development proposals and local plans should take significant consideration of the current condition of such designations instated on neighbouring woodlands, in order to ensure that adequate action is being taken to protect the designated site. Recognising the significant importance of such habitats, actions should also be taken in order to bring benefit to its conservation and improve its overall condition. Plans should ensure that the special features for that particular site are identified and being maintained and managed positively, or improved and increased.

Additional recreation resource

A financially sustainable visitor management plan may, in the right circumstances, help to further mitigate against the effects of elevated levels of visitation on areas of the nation's public forest. However, this could be overly optimistic in the absence of:

- An appropriate ecological buffer as defined above.
- A guaranteed additional resource to improve visitor infrastructure and interpretation i.e. surfaced access trails, pedestrian bridges over watercourses, interpretation and managed access points, particularly where ancient woodland or PAWS are present.

We remain concerned about the potential impact that additional recreational pressure will have on priority habitats and on ancient woodland soils at Parkhurst Forest if appropriate mitigation is not put in place. An agreed financially sustainable visitor management plan

should be considered and we are keen to be part of the discussions to accommodate green infrastructure to include interpretation and education, together with provision of adequate ecological buffer zones.

The plan should include, but not be limited to, identifying the current recreational infrastructure in place and outlining proposals to provide for the increased pressure from activities such as local dog walking, walking, cycling and informal forest activities, which the large development sites will bring. It should explore opportunities for investment into both existing and/or new infrastructure within the woodland, recognising that new and improved infrastructure will also create additional on-going management costs. Forestry England are therefore open to discussing different avenues of investment in-perpetuity in order to respond to the increased visitation pressure of the development and enable us to continue to sustainably manage our woodland in the future.

Such, proposals must also encourage public recreation away from ecologically sensitive areas e.g. Site of Alternative Natural Green Space (SANG), in order to enable biodiversity conservation, and take into consideration the safety requirements of ongoing forestry management activities, such as harvesting operations. It is important to recognise that these areas of the nation's public forest are working forests and remain involved with the sustainable production of timber, which provides an extremely valuable source of revenue for Forestry England. Taking this into consideration, the creation of any visitor management plan will involve detailed discussions with developers and so we ask for a commitment to engaging and working closely with ourselves (Forestry England) in order to incorporate further adjustments to the outline proposal if appropriate. This could possibly enable the agreement of reasonable mitigation measures for increased visitor pressure and also for further site specific requirements to be met in the future.

Consultation and partnership working with Forestry England could provide benefit through:

- ### Mitigation through additional planting

Forestry England will welcome the inclusion of additional planting on adjoining land, as a way to deliver potential mitigation and, if necessary, provide an adequate buffer to the important woodland located in close proximity to the proposed development, by extending the woodland footprint. Expansion of forest/woodland cover will help to deliver mitigation in respect of the undoubted increased footfall within the existing S.41 woodland habitat patches.

Habitat connectivity is also the key to sustain the long-term population viability of European Protected Species (EPS), such as dormouse and bats. Natural corridors between ancient woodlands and other semi-natural habitats should remain free from

development and safe for wildlife. Forestry England are also keen to promote the creation of ecological corridors, including the potential for green bridges or wildlife overpasses, through development sites in order to link areas of the nation's public forest and other wildlife habitat, which will benefit such protected and vulnerable species.

- **Benefits to climate change reduction and carbon sequestration**

There is mounting evidence that climate change could create impacts on our environment that may be substantial, abrupt and irreversible. In response to this a large number of district and county councils within the South Forest District, have recently declared a climate emergency. This has led to prioritising the reduction of their environmental impact by supporting residents, and public and private sector partners, in being greener in their business activities and everyday lives.

Planting and managing trees, forests and woodlands so that they are fit for the future must also be part of our nations response and therefore managing the risks of climate change is now a critical part of the way in which we, Forestry England, manage our woodlands. Growing trees removes carbon dioxide from the air, and stores the carbon in wood products throughout their life; this is otherwise known as carbon sequestration. Trees can also help to manage the risk of flooding, and provide shade and cooling benefits. They are also a renewable source of energy today, and a sustainable raw material for the future bio-economy. Therefore the proactive management of our woodlands to mitigate climate change risks is critical to ensuring adaptation happens without loss of the ecosystem services they provide.