



Position Statement

Ancient woods and translocation

The Trust's view

- Ancient woodland is irreplaceable - in principle we are opposed to development which results in the degradation or destruction of ancient woodland
- We reject suggestions that “translocation” of materials from areas of ancient woodland subject to damage or destruction can be considered as mitigation for loss of ancient woodland.
- Such “translocation” is not avoiding or minimising the loss; it can only be viewed as a “salvage” operation seeking to move components of a complex habitat, when loss of woodland is inevitable, as part of a compensation package.
- Translocation of soils, vegetation or other materials from damaged or destroyed habitats should not be used to justify development decisions in the name of sustainable development.
- A biodiversity cost-benefit analysis should be applied to assess if translocation of soil, vegetation or other elements from damaged or destroyed ancient woodland is sufficient compensation for the loss of biodiversity, compared to, for example, a high ratio of new native woodland creation.
- Clear objectives, a binding commitment to subsequent management and stringent monitoring should be an essential requirement of any consented translocation of ancient woodland components. Monitoring should be long term (a minimum of 25 years), with agreed sanctions or interventions should the translocation not meet its objectives.
- Some species translocations may be considered to be mitigation, depending on the circumstances.

The Trust will:

- Oppose all developments that destroy or damage ancient woodland
- Reject suggestions that soil translocation is a mitigation measure for loss or damage to ancient woodland
- Insist that planning decisions are made on the merits of the case, before considering any proposed habitat translocation schemes
- Ask for a comparison of potential compensation measures where loss of ancient woodland is inevitable
- Insist on comprehensive long-term monitoring of any translocation, with agreed interventions
- Continue to study the research and case studies of woodland translocation
- Encourage the wider use and correct application of the mitigation hierarchy amongst professionals undertaking Ecological Impact Assessments.

Background

It is important to distinguish between mitigation measures, to avoid or reduce negative development impacts, and compensation measures, which aim to make up for the loss of, or permanent damage to, biological resources through provision of replacement habitats. Where damage or destruction of a habitat by a proposed development cannot be avoided, compensation measures are usually built in to conditions of planning permission. Local authorities often seek to build in proposals for habitat translocation to Section 106 agreements (legally binding conditions imposed on a developer, though these may be phased out soon).

In the context of ancient woodland, the term 'habitat translocation' is misleading as it does not reflect the partial nature of what is being moved. The phrase more accurately covers removal of soil, and vegetation of modest size (not mature living trees), from one site to another, not a whole habitat. Ancient woodland is the unique product of its location (geology, topography, climate, biotic influences) and its history. This combination of factors cannot be replicated in a new location. Soil translocation cannot mitigate or compensate for loss of ancient woodland (probably the most complex of all habitats and the most reliant on undisturbed conditions). At best it may create conditions for establishment of relatively natural new woodland but this is unproven. This is borne out in national policy and guidance, such as *A habitats translocation policy for Britain* (Joint Nature Conservation Committee, 2003), and Natural England's *Standing Advice for Ancient Woodland and Veteran Trees* (Revised April 2014).

Scientific literature does not support the idea that habitat translocation can compensate for habitat loss. In a recent study the Highways Agency reviewed 14 sites affected by road construction covering different habitat types and different mitigation techniques. Of the six sites containing woodland, individual species rather than habitats were translocated or new planting was undertaken with varying degrees of success but no instances of successful translocation of ancient woodland were reported. The Woodland Trust produced a report (*Translocation and Ancient Woodland*, April 2013) based on a review of the latest literature, and will continue to monitor published research and case studies.

The Woodland Trust view

Development, especially in south-east England, remains one of the key pressures on wildlife habitats. Given the Woodland Trust's objective of no further loss of ancient woodland, we are opposed to development that results in its degradation or destruction. Since full habitat translocation is impossible for ancient woodland, the Trust does not regard habitat translocation as a practicable mitigation measure. The Government has made a number of commitments to protect native and ancient woodland.

As a compensation measure, translocation should not be used to justify development decisions in the name of sustainable development. Natural England's Standing Advice contains clear advice on when to consider mitigation and compensation measures in the planning balance required by the National Planning Policy Framework: "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." We agree that planning decisions should be made on the merits of the case, not influenced by proposed compensation measures. The planning case must stand or fall on the degree of actual impact of the proposed development upon existing semi-natural habitats, since effective translocation of irreplaceable habitats, particularly ancient woodland, cannot be realised.

Should loss be unavoidable, a cost-benefit analysis should be applied to assess the extent to which the translocation of soil, vegetation or other components from the damaged or destroyed habitat contributes to the overall package required to adequately compensate for the biodiversity loss, and to what extent it delivers only a partial solution compared to, for example, a high ratio of new native woodland creation.

An essential requirement of any consented translocation of soils or other components should be a stringent monitoring programme, over a long term, with agreed sanctions or interventions should the translocation not meet its objectives.

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