**National Infrastructure Commission Call for Evidence**

**Woodland Trust Response**

**January 2016**

The Woodland Trust appreciates the opportunity to respond to the National Infrastructure Commission call for evidence. We recognise the importance of a modern infrastructure system and as such are disappointed that the questions do not make any reference to the importance of green infrastructure and the need to design infrastructure in ways that respects the landscapes and habitats that have done so much to shape our national identity. We hope that our submission will show the Commission that green infrastructure, particularly irreplaceable ancient woodland and newly planted woods and trees need to be a key component in the Commission's considerations on long term infrastructure provision, as per the Government's manifesto promise to 'protect your countryside, green belt and urban environment'.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

**Connecting Northern Cities**

*1. To what extent are weaknesses in transport connectivity holding back northern city regions (specifically in terms of jobs, enterprise creation and growth, and housing)?*

No Comment.

*2. What cost-effective infrastructure investments in city-to-city connectivity could address these weaknesses? We are interested in all modes of transport.*

The Trust would prefer to see investment in public transport solutions rather than road building. Such an approach would minimise environmental impact.

*3. Which city-to-city corridor(s) should be the priority for early phases of investment?*

The Trust cannot comment on specific city to city connection priorities. But we would like to raise the issue of the importance of considering the natural environment from the outset. Whilst the Trust recognises that the development of infrastructure is critical to meet the needs of the growing population, we ask that it is done with due consideration of the natural environment. The Trust is concerned that the Commission's current approach is to consider hard infrastructure needs in isolation from the natural environment. This is reflected by the questions within this consultation. None of them make any reference to the wider environment, whereas the Trust believes the natural environment – both its protection and enhancing its ability to deliver vital ecosystem services to society - should be a starting point for all decisions on the infrastructure provision. This is essential to delivering the current government's manifesto commitment that 'we will build infrastructure in an environmentally sensitive way'

The Natural Environment White Paper (NEWP) published in 2011 must be at the heart of all infrastructure decisions. It outlines the Government's vision for the natural environment over the next 50 years and informs key areas of policy development in relation to conservation and biodiversity. This includes a Government commitment to "providing appropriate protection to ancient woodlands." In addition the NEWP confirms that "Departments will be open about the steps they are taking to address biodiversity and the needs of the natural environment, including actions to promote, conserve and enhance biodiversity."

The NEWP also says "We will move progressively from net biodiversity loss to net gain, by supporting healthy, well functioning ecosystems and establishing more coherent ecological networks."

The evidence on which the Government has based these key policies in the Natural Environment White Paper is found in the Lawton Review. This recognises the importance of habitat networks, and reducing fragmentation of habitats. The review also stated that the government must "provide greater protection to other priority habitats and features that form part of ecological networks, particularly Local Wildlife Sites, ancient woodland and other priority BAP habitats".

Careful ecological assessments and planning at an early stage can minimise damage and ensure that needed infrastructure and mitigation works are as effective as possible in enhancing biodiversity and public access.

The Trust seeks assurances that the Commission is taking these considerations into account at the earliest possible stage.

*4. What are the key international connectivity needs likely to be in the next 20-30 years in the north of England (with a focus on ports and airports)? What is the most effective way to meet these needs, and what constraints on delivery are anticipated?*

No Comment.

*5. What form of governance would most effectively deliver transformative infrastructure in the north, how should this be funded and by whom, including appropriate local contributions?*

To be truly transformative infrastructure must deliver green infrastructure integrated with grey infrastructure. It is critical that green infrastructure is considered beyond simply delivering screening

but to consider the wide range of ecosystem services it can deliver - from reducing flood risk, improving biodiversity and providing valuable green space for local residents. Large infrastructure projects are an opportunity to view local green infrastructure needs strategically as part of wider development needs.

It is vital that the means of securing these new sites is embedded in a legal framework. Options for this include voluntary but nonetheless legally and financially binding "Conservation Covenants", which have recently been the subject of a consultation by the Law Commission. These covenants can be undertaken between local authorities and private landowners, with a term of either perpetuity or a duration agreed between partners. For newly planted woodland to become established, develop a canopy and go through its first cycle of management, a minimum term of 50 years would be required. The recent A21 widening is a key example. The lack of a covenant has seen ancient woodland translocation works occur at the wrong time of year, with some translocation not occurring due to unexpected complications. The whole offsetting schemes was problematic with no financial commitment to mitigation, compensation or monitoring measures after the initial capital-funded 5 year period mentioned in the scheme proposals.

**London's transport infrastructure**

*1. What are the major economic and social challenges facing London and its commuter hinterland over the next two to three decades?*

The London commuter hinterland is predominantly designated as green belt. The green belt offers an exciting opportunity for environmental enhancements on the doorsteps of vast swathes of London's population. The green belt is coming under increasing development pressure, but the Trust would like to see its unique position close to both town and country capitalised on to make critical biodiversity links for wildlife as well as providing vital easily accessible greenspace for urban residents. In early discussions about the green belt, such as in an article by David Niven in 1910, emphasis was placed on the green belt being part of a park system with a focus on public access. With increased development occurring in the greenbelt it is critical that the remaining green belt is enhanced and the ecosystems services it provides capitalised upon. In 1914 in a speech to the London Society Aston Webb (architect of the Victoria and Albert Museum) said in his vision of London in 100 years time he saw 'a beautiful sylvan line practically all around London' with a certain amount of open spaces, pleasure grounds'. This is an opportunity to fulfil that vision and to create infrastructure and communities that are robust and resilient in the face of growing populations and climate change.

*2. What are the strategic options for future investment in large-scale transport infrastructure improvements in London - on road, rail and underground - including, but not limited to Crossrail 2?*

- *How should they be prioritised, taking account of their response to London's strategic transport challenges, including their impact on capacity, reliability, journey times and connectivity to jobs?*

- *What might their potential impact be on employment, productivity and housing supply in London and the southeast?*

No Comment.

*3. What opportunities are there to increase the benefits and reduce the costs of the proposed Crossrail 2 scheme?*

No Comment.

*4. What are the options for the funding, financing and delivery of large-scale transport infrastructure improvements in London, including Crossrail 2?*

*•What is an appropriate local and regional contribution - given the potential distribution of benefits to business, residents, transport users and the wider economy - and how could this be achieved?*

*•What innovative funding mechanisms could be considered to support delivery of key schemes?*

No Comment.

*5. How have major metropolitan areas in other countries responded to similar challenges and priorities? Are there any lessons to be learned and applied in London?*

No Comment.

**Electricity interconnection and storage**

*1. What changes may need to be made to the electricity market to ensure that supply and demand are balanced, whilst minimising cost to consumers, over the long-term?*

*•What role can changes to the market framework play to incentivise this outcome:*

*•Is there a need for an independent system operator (SO)? How could the incentives faced by the SO be set to minimise long-run balancing costs?*

*•Is there a need to further reform the "balancing market" and which market participants are responsible for imbalances?*

*•To what extent can demand-side management measures and embedded generation be used to increase the flexibility of the electricity system?*

No Comment.

*2. What are the barriers to the deployment of energy storage capacity?*

*•Are there specific market failures/barriers that prevent investment in energy storage that are not faced by other 'balancing' technologies? How might these be overcome?*

*•What is the most appropriate scale for future energy storage technologies in the UK? (i.e. transmission network scale, the distributed network or the domestic scale.)*

No Comment.

It is important that as the Commission consider electricity interconnection and storage, due consideration is given to future impacts on the natural environment. Ensuring that the delivery of all future provision takes in to account and works in harmony with our existing green infrastructure is vitally important.

The Woodland Trust has witnessed significant losses of irreplaceable ancient woods and trees across much of England due to the lack of consideration for impact on the natural environment. While new storage technologies and interconnection is something we do not object to, this must not come at the expense of irreplaceable habitats.

The Trust would also emphasise its support for the prioritisation of renewable sources and technologies in electricity provision.

*3. What level of electricity interconnection is likely to be in the best interests of consumers?*

- *Is there a case for building interconnection out to a greater capacity or more rapidly than the current 'cap and floor' regime would allow beyond 2020? If so, why do you think the current arrangements are not sufficient to incentivise this investment?*

- *Are there specific market failures/barriers that prevent investment in electricity interconnection that are not faced by other 'balancing' technologies? How might these be overcome?*

No Comment.

*4. What can the UK learn from international best practice in terms of dealing with changes in energy technology when planning to balance supply and demand?*

No Comment.