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FAO Major Casework Team,

**Reference: S62A/2023/0019**

**Proposal: Access to/from Parsonage Road between Weston Group Business Centre and Innovation Centre buildings leading to: 96 dwellings on Bulls Field, south of Prior's Wood, including associated parking, landscaping, public open space, land for the expansion of Roseacres Primary School, pedestrian and cycle routes to Smiths Green Lane together with associated infrastructure | Land to the north of Roseacres, between Parsonage Road and Smiths Green Lane, Takeley, Essex, CM22 6NZ (Land known as Bull Field, Warish Hall Farm, Takeley, Essex)**

**Objection – potential impact to Prior's Wood**

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 application to the determining authority.

The Trust previously responded to application UTT/21/1987/FUL with respect to Prior's Wood (grid ref: TL5649921750), an Ancient Semi Natural Woodland designated on Natural England's Ancient Woodland Inventory (AWI). We have reviewed the new application proposals and while we note that the number of proposed dwellings has been reduced, we remain concerned about potential deterioration and detrimental impact to Prior's Wood. Our main concerns relate to:

- Intensification of human activity and recreational disturbance.
- Fragmentation of the ancient woodland from adjacent semi-natural habitats.
- Noise, light and dust pollution.
- Threats to long-term retention of trees from increased safety concerns.
- Cumulative effect of the above impacts resulting in long-term deterioration.

## **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 advice<sup>1</sup>:

*"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:*

- *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"*

## **Planning Policy**

The National Planning Policy Framework, paragraph 180, 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 reasons<sup>63</sup> and a suitable compensation strategy exists;"*

Footnote 63, 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."*

Uttlesford District Council's Local Plan (2005) also outlines the protection of ancient woodland within the following policies:

- **Policy ENV7 (The Protection of the Natural Environment – Designated Sites)**
- **Policy ENV8 (Other Landscape Elements of Importance for Nature Conservation)**

## **Impacts to Ancient Woodland**

This application is for the construction of a residential development within close proximity to Prior's Wood. Although we acknowledge that there has been a reduction in the number of dwellings proposed, our concerns for a housing proposal at this site remain as follows:

- Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.

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<sup>1</sup> <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.

When land use is intensified such as in this situation, woodland plant and animal populations are exposed to environmental impacts from the outside of a woodland. In particular, the habitats become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

Natural England and Forestry Commission have identified impacts of development on ancient woodland within their standing advice (please see the annex 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.

### **Mitigation**

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 have also produced guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice (please see the annex at the foot of the document).

Additional mitigation approaches are also outlined in our Planners' Manual<sup>2</sup>; these measures would help ensure that the development meets policy requirement and guidance and include:

- 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.

As the application in question will feature significant new development directly adjacent to an area of ancient woodland, it is apparent that the woodland will need to be sensitively managed to prevent any long-term deterioration from increased recreational pressures, while also ensuring the protection and enhancement of the site's biodiversity value. We note that the applicant has included a woodland management plan as part of the proposals. Sensitive ancient woodland management is welcomed; however, such a measure is not enough on its own in order to prevent gradual and irreversible deterioration. It is imperative that further mitigation measures are considered to protect the ancient woodland, as outlined further below.

### **Buffering**

Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland. When considering the revisions to the number of houses proposed when compared to application

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<sup>2</sup> <https://www.woodlandtrust.org.uk/media/51656/planners-manual-for-ancient-woodland.pdf>

UTT/21/1987/FUL, we would advise that a buffer zone of **at least 30 metres** should be provided to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage.

The buffer should be planted before construction commences on site. HERAS fencing fitted with acoustic and dust screening measures should also be put in place during construction to ensure that the buffer zone does not suffer from encroachment of construction vehicles/stockpiles, and to limit the effects of other indirect impacts.

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**

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. Any development resulting in loss or deterioration of ancient woodland must consider all possible measures to ensure avoidance of adverse impact.

The Trust **objects** to this planning application on the basis of indirect impacts to ancient woodland. The applicant should seek to provide a larger buffer zone to the adjacent ancient woodland. Where appropriate mitigation is not achievable then the application should not be taken forward.

If you would like clarification of any of the points raised, please contact us via [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)

Yours faithfully,

Nicole Moses  
Campaigner – Woods Under Threat  
Woods Under Threat Team

Annex:

**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*