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6th April 2018

Dear Ms Hart,

Planning application: 3/2352-17

Proposal: Application for the phased extraction of 1.25 million tonnes of sand and gravel, mobile dry screening plant, weighbridge, wheel cleaning facilities, ancillary site offices, construction of a new access onto Wadesmill Road with phased restoration to landscaped farmland at a lower level | Land at Ware Park, Wadesmill Road, Hertfordshire

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 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least 1600 AD. 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. We aim to prevent damage, fragmentation and loss of these finite irreplaceable sites.

The Woodland Trust **objects** to the application in question on the basis of damage to St John's Wood (grid ref: TL325153), an area of ancient semi-natural woodland designated as such on Natural England's Ancient Woodland Inventory (AWI).

Planning policy

National Planning Policy Framework, paragraph 118, states that "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."

The draft revised National Planning Policy Framework, published on 5th March 2018, further outlines the Government's commitment to improving protection for ancient woodland through the planning system. It states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists." This wording is a clear recognition from the Government of ancient woodland's importance and better need for protection.

Natural England's Standing Advice for Ancient Woodland and Veteran Trees¹ states: "Ancient woodland, and trees classed as 'ancient', 'veteran' or 'aged' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreational value, and cultural, historical and landscape value."

Hertfordshire County Council is currently consulting on their Draft Minerals Local Plan 2017. This plan includes wording in respect to the protection of ancient woodland in both 'Policy 17: Landscape and Green Infrastructure' and 'Policy 18 – Biodiversity':

- Policy 17 states "Proposals for mineral extraction and associated development will be permitted where it can be demonstrated that throughout the life time of the development (including restoration):
 - the protection of designated landscapes (e.g. AONB) and sites (e.g. Ancient Woodlands) are maintained.
- Policy 18 states "Proposals for mineral extraction and associated development will be permitted where it can be demonstrated that throughout the life time of the development (including restoration):
 - the impact on biodiversity through loss of or damage to habitats and/or species is minimised;
 - the protection of priority habitats (including Ancient Woodlands, Veteran trees and priority species) is promoted and maintained.

Impacts on ancient woodland

The application in question proposes mineral extraction adjacent to ancient woodland. The implementation of a 2m bund is highly unlikely to prevent many of the impacts that St John's Wood will face. We are particularly concerned about the following:

- Noise and light pollution occurring from the adjacent quarry, during both construction and operational phases, particularly from the use of heavy machinery.
- The production of dust is an inevitable part of quarrying activity and it is likely that the dust generated from the quarry site will enter the ancient woodland.
- Adverse hydrological impacts can occur on account of changes to the area's hydrology with ground water and surface water quantities being affected. This can also result in harmful pollutants/contaminants being introduced into the woodland.

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

- Ancient woodland soils are important for the complex structures they have developed from centuries of being relatively undisturbed. Quarrying adjacent to St John's Wood will have a detrimental impact on these soil communities.

The cumulative effect of the above impacts will have a significant impact on the ancient woodland. When land use is changed to a more intensive use the woodland's plant and animal populations are exposed to harmful external impacts, otherwise known as edge effects. These detrimental edge effects can result in changes to the environmental conditions within the woodland and affect the wood's stable conditions. Such impacts have been shown to penetrate woodland causing changes in ancient woodland characteristics up to three times the canopy height in from the forest edges.

Some of the main by-products of quarrying are noise and dust pollution. Noise associated with quarrying activity comes from a range of sources, mostly involving large machinery and vehicles. Noise levels will be elevated and likely remain constant over time. They are likely to limit the distributions of animal species that are intolerant of noise and negatively affect their reproductive success near to woodland edges.

Dust is produced from quarrying activity and can be easily distributed over larger areas. Flora within ancient woodland is particularly sensitive to dust, for example dust has a major deleterious impact on epiphytic lichens, which form part of the complex ecosystem that make up ancient woodland and are often used as an indicator of the quality of the rest of a habitat. Trees are effective filters of dust, but this is typically to their detriment as they have been shown to suffer from growth reductions when exposed to dust. The impacts of dust on this variety of vegetation can result in a fundamental change to the composition of the woodland.

Furthermore, local faunal populations would likely be affected by noise and light pollution generated from the development during its construction phase and also after completion. The creation of this intensively used site directly adjacent to St John's Wood will lead to the disturbance of the ancient woodland habitat and likely cause stress to local wildlife populations, with subsequent impacts on wider wildlife populations.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use adjacent to ancient woodland.

Natural England's Standing Advice for Ancient Woodland recommends "leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland (depending on the size of the development, a minimum buffer should be at least 15 metres)".

Considering the impacts and intensity of a quarry adjacent to ancient woodland a 15m buffer would clearly not be adequate to protect the wood. As such, the Trust requests that a buffer of at least 100m is implemented between the planned extraction area (Phase 3) and the

ancient woodland. Ideally the buffer zone should comprise a semi-natural strip planted with at least 50% tree cover. The distance provided by a 100m buffer and planting of new vegetation will mitigate the impacts of the development while also increasing available habitat and contributing to an increase in biodiversity.

Conclusion

Ancient woodland is irreplaceable; once lost it is cannot be re-created. Any development resulting in damage or loss to ancient woodland is unacceptable and must be avoided at all costs.

In summary, the Trust **objects** to the planning application in question on the basis of damage to St John's Wood, an area of ancient woodland adjacent to the proposed extraction site. We will maintain our objection until the applicant commits to affording the ancient woodland appropriate protection from indirect impacts through the **implementation of a 100m buffer**. We consider that the proposals in their current form would have unacceptable impact on the ancient woodland and therefore contravene both local and national planning policy.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Trust then please do not hesitate to get in contact with us.

Yours sincerely,

Jack Taylor
Campaigner – Ancient Woodland