

R Mary Rance
Ref No 20031504

I refer to REP3-039 Written Summary of Longfield's oral submissions on environmental matters, pdf page 13, paragraph 3.1.44.1 This is part of the Applicant's justification for BMV land remaining within the Order Limits, and it refers to the area where they propose to build the BESS and Longfield Substation. Ms Leeder described the area as a good location for these buildings because 'established woodland on three sides' would give it visual screening. Why does this reason justify the loss of the field of BMV that lies within this triangle? Also, this land is productive in spite of 'pests and wildlife' (an occupational hazard of arable farming).

The area combines valuable ancient woodland, prime agricultural land, a wealth of flora and fauna, and landscape and visual amenity the tranquillity of which will be shattered by this industrial development.

More scrutiny should be given to the buffer zone of 15m to which the Applicant has agreed. Government is seeking to strengthen the guidelines for ancient woodlands to give them more protection, but meantime the minimum distance required by the existing NPPF is augmented by more advice from various bodies. They suggest that a 15m buffer zone is not enough in every case. I have downloaded the following short extracts from Natural England and the Forestry Commission, and the Woodland Trust, in support of this. My highlighting.

Standing advice from Natural England and the Forestry Commission (published 14 Jan 2022 on Gov.uk).

Buffer zone recommendations

For ancient woodlands, 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.

The Woodland Trust

Provide adequate buffers. A buffer is a landscape feature used to protect a sensitive area from the impact of disturbance both during and after construction.

As a precautionary principle, a **minimum 50 metre buffer** should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. **A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.**

The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat.

The consequent increase in ecological connectivity between areas of ancient woodland will create the resilient landscapes recommended in Making Space for Nature published by Defra 20/10/21.

I am not aware that the Applicant has made any demonstration of how the minimum buffer would suffice. For example, has the width of the proposed buffer zone been considered in relation to the damage this lengthy construction and operation will cause to the wildlife within the woodlands?

The area indicated for the buildings is close to a vehicle track that edges the entire long border of the woodland. Will this track continue to be used and does it form part of the 15m buffer proposed? Is a road permitted within a buffer zone?

The Applicant has accepted that the woodland will be permanently affected by operational noise. This may be 'significant disturbance' as highlighted above.

If the ExA considers that the 15m buffer is not adequate in this case, then it is possible that the location, with three blocks of ancient woodland all requiring similar protection, will not be large enough to accommodate a 17-acre site of industrial buildings.

I have studied the photographs that Longfield have provided and found them to be uniformly dull and not indicative of this landscape which is so valued. As the Inspector's visit is not until early December, the prevailing weather with trees shorn of leaves and colour might not impress. With that in mind I am attaching a two-minute video; the first part was taken in September, at the end are some shots taken during summer. It starts from the **Waltham Road** end, a little way along **PRoW No 213-19**, walking towards Toppinghoehall Wood (south). The camera pans across the field showing the other two areas of woodland on the northern side of the 'triangle' (Toppinghoehall north and Lost Wood). On reaching the wood, the right of way through the trees can be glimpsed, but the camera follows the vehicle track along the boundary of the wood. From the next bend, the land on the left of the screen is where the BESS and Longfield Substation are proposed and will continue all the way along beyond the end of the woodland.