



The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

20th July 2022

Dear Simon Warder,

Reference: East Northants Resource Management Facility Western Extension

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 Planning Inspectorate.

The Woodland Trust **objects** to this proposal on account of likely deterioration and detrimental impact to Collyweston Great Wood, an Ancient Semi Natural Woodland designated on Natural England's Ancient Woodland Inventory (AWI) which forms part of both Collyweston Great Wood and Easton Hornstocks Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR).

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 advice¹:

"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"*

National Planning Policy

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

Paragraph 5.3.14 of the **National Policy Statement for Hazardous Waste** states: *“Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result 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 of the habitat. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.”*

The **National Planning Policy Framework, paragraph 180**, also 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 reasons⁶³ and a suitable compensation strategy exists;”*

Impact of proposals

The Woodland Trust holds serious concerns regarding the construction of an extension to the existing East Northants Resource Management Facility. The proposed extension area will be sited directly adjacent to an area of SSSI ancient woodland. The proposals will also include the winning and working of materials from the proposed landfill voids and a waste treatment and recovery facility directly adjacent to the ancient woodland.

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.

We are specifically concerned about the following impacts to the ancient woodland:

- Pollution occurring from by-products of the quarrying and landfilling activity e.g. stone dust, airborne soil particles from the movement, storage and stripping of soils, transport emissions, and chemical impacts from works. These can alter the composition of plant communities through differentially stimulating or changing competitive interactions that determine relative species abundance and diversity.
- Disturbance by noise (blasting), floodlighting, vibration, trampling and other activities from the development during both construction and operational phases.
- Hydrological changes altering ground water and surface water quality and quantity. Run off, drainage issues and dust loaded rainwater drift from the development will result in changes to the characteristics and quality of adjacent woodland’s water sources from pollution, contamination etc.

When land use is further 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.

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' Manual²; 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.
- Introduction of sympathetic management for neglected woodlands or trees.
- 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.

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.

With respect to the proposed quarrying/landfilling works, a buffer zone of at least **100 metres** should be afforded to allow for the potentially significant impacts of dust pollution generated from the development. Regarding the waste treatment and recovery facility, 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.

² <https://www.woodlandtrust.org.uk/media/3731/planners-manual-for-ancient-woodland.pdf>

The Trust **objects** to this proposal on the basis of indirect impacts to ancient woodland. The applicant should seek to afford suitable buffer zones to ensure protection for Collyweston Great Wood. Where appropriate mitigation is not achievable then the application should not be taken forward.

This application contravenes national planning policy designed to protect ancient woodland and should be considered for refusal, unless the applicant is able to demonstrate that deterioration will be avoided.

We hope our comments are of use to you, but if you would like to get in touch with the Trust further to discuss any of the points raised, please do not hesitate to do so.

Yours sincerely,

Nicole Hillier
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*