



**APPLICANT'S COMMENTS ON THE WOODLAND  
TRUST SUBMISSION AT DEADLINE 7**

***PINS project reference: WS010005***

**PINS document reference: 17.2**

**July 2022**



**Baddesley Colliery Offices, Main Road, Baxterley, Atherstone,  
Warwickshire, CV9 2LE.**

**Telephone :** [REDACTED]



**The Applicant's response to the Deadline 7 submission made by The Woodland Trust (REP7-017)**

The Woodland Trust initially engaged with the pre-application consultation in December 2020 and provided a response to the pre-application consultation which included the Preliminary Environmental Information Report. The response from the Woodland Trust and the comments from the Applicant are provided in the Consultation Report Appendix CRO (page 28/31 APP-036) which was submitted with the application. In their response the Woodland Trust expressed 'significant concerns' but did not object to the application. The Applicant's ecology specialist responded to the Woodland Trust's concerns in April 2021 (Table 3 (page 22/23) in the Ecological Impact Assessment (Appendix ES13.1 to the Environmental Statement. APP-087). A full copy of the email from the Woodland Trust dated December 2020 and the response dated April 2021 are attached at Annex A to this submission.

As they had responded to the pre-application consultation, The Woodland Trust were notified of the acceptance of the application on 14 October 2021 through the delivery of an electronic newsletter as explained in Section 2.4 of the Communications Update Report (REP7-016).

No further response was received from the Woodland Trust until the submission at Deadline 7.

Due to their earlier interest in the application The Woodland Trust were included in the Non Material Change proposal consultation as listed at Appendix CRA to the Non-Material Change Consultation Report (pdf page 46. REP7-010)

The submission made by the Woodland Trust at Deadline 7 is not a response to the Non Material Change proposal or a response to any of the documents listed for Deadline 7 in the Rule 8 letter dated 9 February 2022. If the Woodland Trust wished to make an objection to the application this should have been registered far earlier in the application and examination process. Nevertheless, the Applicant provides below a response to the comments made in the submission. We attach also at Annex B to this response a copy of correspondence provided directly to the Woodland Trust.

| <b>Paragraph number</b> | <b>Comment in the submission from Woodland Trust</b>   | <b>Response from the Applicant</b>   |
|-------------------------|--|--|
|                         | 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 | The response below suggests that the information provided as part of the application and Examination has not all been reviewed and taken into account in the comments made, including in particular the surveys, assessments, and the detailed consideration and design of the mitigation proposals. |

| Paragraph number        | Comment in the submission from Woodland Trust   | Response from the Applicant  |
|-------------------------|---|--|
|                         | 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 <b>objects</b> 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).   | <p>The pre-application submission from the Woodland Trust in December 2020 registered 'strong concerns' but not an objection.</p> <p>The objection from The Woodland Trust has been made very late in the Examination Period. The Woodland Trust were notified of the acceptance of the application and provided with the details of how to register as an Interested Party. The Woodland Trust did not register as an Interested Party and have not engaged in the Examination process until Deadline 7. The Woodland Trust proffers no specific evidence that there will be a deterioration and detrimental impact and does not take into account the detail of the development. The Trust appears to rely primarily on Natural England and Forestry Commission Policy whereas both organisations have agreed that there is no conflict with these policies.</p> |
| <i>Ancient Woodland</i> |   |  |
|                         | <p>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:</p> <p><i>"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;</i></p> | <p>The Applicant is fully aware of the standing advice which was taken into account in the design of the facility.</p> <p>The importance and sensitivity of the adjacent woodlands, including the Ancient Woodland, and the need to protect them has been recognised from the outset and significant specific impact assessments and mitigation measures are included in the application documents and the development design. The restoration design is based on securing the ambition of the national and local groups that the woodland will be enhanced by the proposals.</p>  |

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|                  | <p><i>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:</i></p> <ul style="list-style-type: none"> <li><i>• Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.</i></li> <li><i>• 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”</i></li> </ul> | <p>Significant engagement has been undertaken with Natural England and the Forestry Commission as well as other wildlife interest groups during the pre-application process and the Examination period to develop and agree the potential impacts and the appropriate mitigation. Details of this engagement are provided in Appendix 1-11 of PINS document reference 13.1 (APP-087).</p> <p>Natural England have agreed a Statement of Common Ground with the applicant which is presented at Appendix D of PINS document reference 9.3 V5 (REP7-009).</p> <p>In the Statement of Common Ground at Paragraphs 4.9 and 4.10 it is stated that:</p> <p><i>4.9 The protection and mitigation measures are set out in the Ecological Management, Monitoring and Aftercare Plan (presented at Appendix DEC E to the Environmental Commitments Document) (REP6-008) which is agreed. The management of the mitigation and the phased provision of the restoration scheme at the site would be the subject of a Phasing, Landscaping and Restoration Scheme prepared and agreed in accordance with Requirement 4 in the draft DCO which includes approval by North Northamptonshire Council as the Local Planning Authority. Based on this it is agreed that there will be no significant negative residual ecological effects associated with the proposed development and for many of the ecological features, species and habitats there will be a significant positive effect in the short term as well as in the long term.</i></p> |

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|                                 |  | <p>4.10 It is agreed that the restoration is designed to benefit reptiles, invertebrates including butterflies, amphibians and small mammals, including potentially dormice. All planting will include a high proportion of locally native species including berry-bearing bushes and scrub for birds and species-rich grassland for invertebrates which in turn will benefit bats and birds. It is agreed that the development can be undertaken with minimal impact on the ecological interest at and in the vicinity of the site. In the short and the long term the new and enhanced habitats will provide a significant benefit to species present at and in the vicinity of the site and contributes to landscape scale recovery.</p>  |
| <i>National Planning Policy</i> |  |  |
|                                 | <p><b>Paragraph 5.3.14</b> of the <b>National Policy Statement for Hazardous Waste</b> 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</p> | <p>There will be no loss of ancient woodland as a result of the proposed development. The design of the development incorporates protection measures for the boundary habitats and the root protection areas for the adjacent woodlands have been carefully defined to ensure there is no deterioration. These are set out in Appendix DEC B of the DCO Environmental Commitments document (PINS document reference 6.5 v3, REP7-008).</p> <p>In their Relevant Representation made shortly after the application was accepted Natural England state that (RR-010):<br/> ‘3.1.2. Natural England is satisfied that the project is unlikely to have a significant impact on the nearby Collyweston Great Wood and Easton Hornstocks SSSI and National Nature Reserve (Adjacent to the application site), Bedford Purlieus SSSI and National Nature Reserve and Bonemills Hollow SSSI.’</p> <p>The application is accompanied by an Arboricultural Report including a Tree Protection Plan (Appendix 2 to the Ecological Impact Assessment</p> |

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|                            | <p><i>their conservation or, where their loss is unavoidable, the reasons why.”</i></p> <p>The <b>National Planning Policy Framework, paragraph 180</b>, also states: “<i>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;”</i></p>  | <p>(Appendix ES13.1, APP-087). Specific consideration is given in the Ecological Impact Assessment to paragraph 5.3.14 of the NPS regarding the value of veteran trees and appropriate mitigation measures are included in the development design.</p> <p>As stated in the SOCG with Natural England (Appendix D of PINS document reference 9.3 V5 (REP7-009)) in Paragraph 4.5 of the SoCG that:</p> <p><i>‘It is agreed that the restoration of the site will have a positive effect on the natural environment by creating new and enhanced habitats connecting and providing stronger ecological links between Collyweston Great Wood and Easton Hornstocks SSSI and Fineshade Woods.’</i></p> |
| <i>Impact of proposals</i> |  |  |
|                            | <p>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.</p> <p>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</p> | <p>As stated above the importance and sensitivity of the adjacent woodlands, including the Ancient Woodland, and the need to protect them has been recognised from the outset. Accordingly the Applicant has conducted comprehensive surveys, undertaken appropriate specific impact assessments and included mitigation measures which are described in the application documents and the development design. The Forestry Commission and Natural England have been consulted extensively. Neither body have any outstanding concerns regarding the proposed development.</p>   |

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|                  | <p>development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this application.</p> <p>We are specifically concerned about the following impacts to the ancient woodland:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Disturbance by noise (blasting), floodlighting, vibration, trampling and other activities from the development during both construction and operational phases.</li> <li>• 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.</li> </ul> <p>When land use is further intensified such as in this situation, woodland plant and animal populations are exposed to environmental impacts from the</p> | <p>The stripping and storage of soil is controlled under Appendix DECI of the DCO Environmental Commitments (PINS document reference 6.5 v3, REP7-008). The proposed development will be the subject of an Environmental Permit regulated by the Environment Agency. The Environmental Permit includes controls and limits which are protective of the environment and human health for emissions including those from the flare stack and dust.</p> <p>There will be no blasting at the site as a result of the proposed development. The noise and disturbance expected from the proposed development will be similar to that produced by the existing agricultural working the protected species present on the site are expected to ignore or habituate to the level of noise and disturbance.</p> <p>In the SoCG with Natural England (Appendix D of PINS document reference 9.3 V5 (REP7-009) at Paragraph 4.13 it is agreed:</p> <p><i>‘...that the emissions from the site to the aqueous environment will be adequately assessed and regulated through the pollution control framework such that the proposed operations would not have an unacceptable impact on surface water or surface water quality. Natural England accepts the conclusions that the proposed development can be undertaken without significant individual or cumulative adverse impacts on surface water or groundwater flow or quality at internationally and nationally designated ecological sites in the vicinity of the ENRMF.’</i></p> |

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|                   | <p>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.</p>   | <p>Based on the embedded protection of tree roots incorporated into the proposals and the requirement to comply with Environmental Permits for the waste landfilling and treatment operations, described in Section 5 of the Environmental Statement (APP-049) and Appendix ES13.1 it is demonstrated (and agreed by Natural England) that there will be no significant negative effects, including cumulative effects, on any valued site and in the long term there will be a significant positive effect on the Rockingham Forest area, including both woodland sites in the immediate vicinity of the proposed western extension.</p>   |
| <i>Mitigation</i> |  |   |
|                   | <p>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).</p> <p>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:</p> <ul style="list-style-type: none"> <li>- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.</li> </ul> | <p>The design principles for the protection of the boundary habitats and the root protection areas for adjacent woodlands are set out in Appendix DEC B of the DCO Environmental Commitments Document (PINS document reference 6.5 v3) (REP7-008). These design principles have been agreed as appropriate and suitably protective with Natural England. These design principles include all of the mitigation approaches listed from the Woodland Trust Planners’ Manual.</p> <p>The restored site will be monitored for an aftercare period of 20 years following the completion of restoration. This means that the areas adjacent to the woodland, which will be operated and restored in the earliest stages of the proposed extension, will have been monitored and maintained for a longer period than 20 years.</p> |



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|                  | <ul style="list-style-type: none"> <li>- Measures to control noise, dust and other forms of water and airborne pollution.</li> <li>- Sympathetic design and use of appropriate lighting to avoid light pollution.</li> <li>- Introduction of sympathetic management for neglected woodlands or trees.</li> <li>- 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.</li> </ul>   |   |
| <i>Buffering</i> |  |   |
|                  | <p>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.</p> <p>With respect to the proposed quarrying/landfilling works, a buffer zone of at least <b>100 metres</b> 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 <b>at least 30 metres</b> should be provided to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage.</p> <p>The buffer should be planted before construction commences on site. HERAS fencing fitted with</p> | <p>The design principles for the protection of the boundary habitats and the root protection areas for adjacent woodlands are set out in Appendix DEC B of the DCO Environmental Commitments Document (PINS document reference 6.5 v3) (REP7-008). This includes fencing and enhancement. These design principles have been agreed as appropriate and suitably protective with Natural England. The mitigation measures include the installation of fencing throughout the operational period to delineate and maintain the agreed root protection zones.</p> |

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|                   | <p>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.</p> <p>This is backed up by Natural England and Forestry Commission's standing advice which states that "<i>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.</i>" Further information on buffer zones is outlined in the annex below.</p> |   |
| <b>Conclusion</b> | <p>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.</p> <p>The Trust <b>objects</b> 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.</p>   | <p>There will be no direct or indirect impacts on the ancient woodland in Collyweston Great Wood. The proposed development accords with the National Planning Policy in respect of ancient woodland as mitigation measures and enhancement measures are incorporated in the site design and will create connectivity between the two areas of woodland.</p> |

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|                  | <p>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.</p> <p>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.</p> |                             |

**ANNEX A**

**EMAIL FROM THE WOODLAND TRUST DATED DECEMBER 2020 AND THE  
RESPONSE FROM ESL TO THE WOODLAND TRUST DATED APRIL 2021**

**campaigning@woodlandtrust.org.uk <campaigning@woodlandtrust.org.uk>**

to ENRMF@augeanconsultation.co.uk, campaigning@woodlandtrust.org.uk

Dear Sir/Madam,

Thank you for the opportunity to provide comment on the above consultation.

The Woodland Trust holds **serious concerns** regarding the proposed extension site on account of detrimental impact to the adjacent ancient woodland which forms part of the Collyweston Great Wood & Eastern Hornstocks Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR).

Ancient woodland is afforded protection within paragraph 175 of the National Planning Policy Framework: *“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>58</sup> and a suitable compensation strategy exists;”*

We understand from the information provided that alongside the use of the site as a landfill facility, initially the site will be used as an active mineral extraction area. Mineral extraction can result in significant impacts on areas of adjacent ancient woodland, and we are particularly concerned about the following impacts:

- Pollution occurring from by-products of the quarrying 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.

Natural England has identified the impacts of development on ancient woodland within their standing advice. This guidance should be considered as Natural England’s position with

regards to development impacting ancient woodland: *“Mitigation measures will depend on the development but could include:*

- *improving the condition of the woodland*
- *putting up screening barriers to protect woodland or ancient and veteran trees from dust and pollution*
- *noise or light reduction measures*
- *rerouting footpaths*
- *removing invasive species*
- ***buffer zones”***

This development should allow for a buffer zone of **at least 100 metres** to avoid root damage and to allow for the effect of pollution from the development. This is backed up by Natural England’s Standing Advice which states that *“you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, **you’re likely to need a larger buffer zone.** For example, the effect of air pollution from development that results in a significant increase in traffic.”*

To conclude, The Woodland Trust holds **significant concerns** regarding the potential impact to the adjacent SSSI ancient woodland. We hope our comments are of use to you – if you’d like to discuss anything further please do not hesitate to get in touch.

Kind regards,

Nicole Hillier

Nicole Hillier  
Campaigner - Woods Under Threat

The Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
0330 333 3300  
[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

The Woodland Trust is not a statutory body. As a charity, we provide all information in good faith, funded by public donations. For more information about this [visit here](#).

[Stand up for trees](#)

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Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.



**From:** [Anne Goodall](#)  
**To:** [REDACTED] [@woodlandtrust.org.uk](mailto:[REDACTED]@woodlandtrust.org.uk)  
**Cc:** [Eleanor Nicholson](#); [Leslie Heasman](#)  
**Subject:** Your concerns over the Western Extension of the ENRMF  
**Date:** 03 April 2021 13:47:57  
**Attachments:** [image001.jpg](#)

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Hello Nicole

I am writing to, hopefully, allay your concerns over negative impacts to the ancient woodland of Collyweston Great Wood & Eastern Hornstocks SSSI and NNR.

Firstly, some details of the planned activities. The site will not be used as an active mineral extraction area in the normal sense. The two fields lie on clay, and it will be necessary to simply remove some of this clay in order to form the void to receive the specified waste. This will not involve any activities such as blasting, and clay doesn't produce dust. There will be a need to strip the topsoil, but this will be done on a phased basis, with the topsoil stored carefully for use in restoration. Some of the clay will be used in lining and eventually capping the cells, some will be removed off-site to be used on Augean land elsewhere, and some will be used in producing the soil for planting. All activities involved will be the same as have been used on the current site, which lies a short way south of Collyweston Great Wood, divided from it by a small stand of trees. The level of vehicle movements, etc, will be similar to those in use for more than 10 years on the existing site. There will be no requirement for flood-lighting, or working at night; vehicles working the site may use their headlights where necessary for health and safety, but since this will be in the daytime, there will be no disturbance to bats.

With regard to the bats, we have been carrying out surveys over the fields and adjoining woodlands since 2018; somewhat disturbed by the Covid regulations, but we are continuing this spring to complete the surveys which were not possible in 2020. Unfortunately Covid also prevented the Cambridgeshire Bat Group from carrying out the mist-netting surveys they had planned in Collyweston Great Wood, but the Back from the Brink team were able to carry out some static detector work on the two hedgerows joining the woods, which Susannah has shared with us. We have also carried out walked transects in both woods, along both woodland margins and down the centre of the fields monthly, and also used static detectors on the wood edges, on the hedges and along rides and glades in both woods, for several nights monthly. (We have shared with Susannah the results of the work that we had available; happily in one way but unfortunately in another, there was a vast amount of data from the statics, which has taken all winter to analyse!) This has given us a very good feel for the bat populations, movements, locations of likely roosts, and the extent to which bats cross the field both directly and along the central hedge. There will be no effect on either woodland, and no disturbance to any roost locations. With the information gained from the surveys, we have introduced embedded enhancements, and we are confident that we can also ensure that connectivity between the woods is not lost.

We have discussed our plans for protecting the woodlands with both Natural England and the Forestry Commission, who have accepted them. We carried out an Arboricultural survey of the whole site, particularly the margins, and have produced a tree protection plan. There will be no adverse effects on the woodlands, but the NE Guidance will be followed; there will be no dust or pollution, minimal noise and no light pollution, and there are no existing foodpaths (though these are included in the planned restoration) and no invasive plant species. There will be a stand-off from the woodland margins which exceeds the Tree Protection Requirement, and will provide an RPA/CEZ, since no vehicles will be allowed within it. This mitigation zone is also intended to protect amphibians and reptiles and especially invertebrates; our surveys have revealed that the grass strip around the field, and especially along the Collyweston Great Wood boundary, plays a major part in the life-history of many of the most important species using the ancient woodland, particularly the saproxylic species. For this reason, our intention is to enhance this boundary strip with flower rich grassland for invertebrates, but also to provide cover and feeding/basking areas for herpetofauna. The surface water protection plan is nearing completion, and we shall be discussing shortly how the drains and waterbodies required to protect the trees can also



provide new and additional ecological habitat. The north-western hedge will be enhanced by planting a parallel species-rich hedge close to it, to provide especially for butterflies, and a movement corridor for dormice.

The field will be worked in phases, starting in the north, and the northernmost cell is expected to be created, filled, capped, and restoration started within around 6 years of starting. The protective fence will then be removed from this area, which will provide the first new area of linking woodland. Once completed there will be three grassed corridors across the two fields, all lined with hedges, to provide movement corridors for a wide range of species. The remainder of the area will eventually be wooded, although at first it will be closer to wood pasture, since we want to incorporate grassland for butterflies and a wide range of pollinators, in addition to the reptiles and amphibians. Both Natural England and the Forestry Commission are in agreement with a policy of some planting and some natural regeneration (both protected from deer of course!) as a way to properly blend the new woodland in.

I hope this brief sketch gives you a more realistic view of what is actually planned, and that the end result will be to unite the two woodlands. If you have any further questions, or there is anything else you would like to know, please feel free to get in touch.

Best wishes,  
Anne



**ANNEX B**

**A COPY OF CORRESPONDENCE PROVIDED DIRECTLY TO THE WOODLAND TRUST  
DATED 29 JULY 2022**

## Robyn Northall

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**Sent:** 29 July 2022 09:43  
**Subject:** FW: East Northants Resource Management Facility Western Extension  
**Attachments:** Woodland Trust - ENRMF Western Extension.pdf

**From:** Gene Wilson <[REDACTED]@augean.co.uk>  
**Date:** 29 July 2022 at 09:22:41 BST  
**To:** [REDACTED]@woodlandtrust.org.uk, [REDACTED]@woodlandtrust.org.uk  
**Cc:** Peter Oldfield <[REDACTED]@augean.co.uk>  
**Subject:** East Northants Resource Management Facility Western Extension

Dear Nicole

Please find attached a letter response to you submission to the Planning Inspectorate dated 20<sup>th</sup> July 2022.

As stated in the letter we should be pleased to discuss the development with you if that would be of assistance. We operate an open-door policy and you would be welcome to visit the site. Please do not hesitate to contact us if you wish to take us up on these offers.

Best regards  
Gene

Nicole Hillier  
The Woodland Trust  
Kempton Way  
Grantham  
Lincolnshire  
NG31 6LL

29 July 2022

Dear Nicole

**Reference: East Northants Resource Management Facility Western Extension**

I have received a copy of your letter of the 20<sup>th</sup> July 2022 to Simon Warder of the Planning Inspectorate. I am writing to update you on progress with this project. You made similar comments in December 2020 at the pre-application stage to which Anne Goodall of ESL responded. I hope that that you will find that we have very much taken on board your initial comments and assure you that the development will not result in significant adverse ecological impact but will enhance at a local and landscape scale the ecology of the area and is an opportunity make a significant contribution to the re-connection of Rockingham Forest.

The sensitivity of and the importance of protection of woodland, let alone ancient woodland, to development is recognised by Augean, hence comprehensive surveys were undertaken to understand the ecology of the site itself and its surrounds. We consulted at a very early stage with the Forestry Commission and Natural England, and furthermore many other local conservation organisations. Taking on board their comments, advice and policies we incorporated into our designs a range of avoidance, mitigation measures and enhancement measures. These address as appropriate the concerns you also raise relating to pollution, dust, noise, floodlighting, vibrations, trampling and hydrological changes to ground and surface water. Each of these matters, and many more in relation to ecology, have been fully documented in the Environmental Impact Assessment.

The development includes returning the entire, currently agricultural, site to woodland and grassland as part of the restoration proposals. There are initial enhancement works and the first phases will begin to be restored within a few years of commencement then progressively throughout the development. The Biodiversity Net Gain score is not negative at any stage in the development and ultimately results in a gain of 110%. Long term management and monitoring of the site is included in the proposals; something that the Woodland Trust may in due course wish to take an interest in.

Ultimately there were no objections to the application from local or statutory nature conservation organisations. The Forestry Commission determined it did not need to engage



with the application process and a full agreement of the proposals has been reached with Natural England in a formal Statement of Common Ground.

I hope that this information is helpful to you. I should be pleased to discuss the matter further if it would be of assistance or to host a site visit. Please do not hesitate to contact me.

Yours sincerely

A black rectangular redaction box covering the signature of Dr Gene Wilson.

Dr Gene Wilson (MRTPI, MIEEM, MCIWM)  
Director of Environmental Planning

Cc Pete Oldfield: Augean Head of Planning and Permitting