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Sevenoaks District Council
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18 November 2019

Dear Sir/Madam,

Application: 19/05000/HYB

Proposal: Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,659 sq m GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 750 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); primary school; change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space and; associated landscaping, works and infrastructure. In detail: demolition of existing buildings; change of use and works including extension and associated alterations to buildings Q13 and Q14 including landscaping and public realm, and primary and secondary accesses to the site. | DSTL Fort Halstead Crow Drive Halstead Sevenoaks KENT TN14 7BU

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 29,000 hectares (71,000 acres) and we have 500,000 members and supporters.

Ancient Woodland

Natural England¹ defines ancient woodland "*as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] 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"

Both ASNW and PAWS woodland are given equal protection in the National Planning Policy Framework (NPPF) regardless of the woodland's condition.

Veteran Trees

Natural England's Standing Advice on veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or*

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

other areas. They are often found outside ancient woodlands. They are irreplaceable habitats with some or all of the following characteristics... A veteran tree may not be very old, but it has decay features, such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value."

Damage to ancient woodland and veteran trees

The Woodland Trust **objects** to the above planning application on the basis of damage to several areas of ancient woodland, designated on the Ancient Woodland Inventory. The woodlands of concern are as follows:

- Hangman Down Shaw ASNW (grid reference: TQ5040260383)
- Unnamed ASNW at grid reference: TQ5019859888
- Unnamed ASNW at grid reference: TQ4975159650
- Unnamed PAWS at grid reference: TQ4957859682
- Unnamed PAWS at grid reference: TQ4953459576
- Unnamed ASNW at grid reference: TQ4942859348
- Dutchmore Wood ASNW (grid reference: TQ4941159185)
- Unnamed ASNW at grid reference: TQ4929859130
- Unnamed ASNW at grid reference: TQ4944558911
- Old Grove ASNW/PAWS (grid reference: TQ5020859573)
- Anisbirches ASNW (grid reference: TQ5005459130)

The Trust is also concerned about the impact to two trees recorded as 136 and 137 in the Arboricultural Impact Assessment which display veteran characteristics.

Policy

The National Planning Policy Framework, paragraph 175 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 reasons⁵⁸ and a suitable compensation strategy exists;"

Footnote 58, 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."*

There is **no wholly exceptional reason** for the development in this location and as such this application should be refused on the grounds it does not comply with national planning policy.

Impacts to ancient woodland

When land use is intensified such as in this situation, 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's Standing Advice for ancient woodland and veteran trees states: *"Nearby development can also have an indirect impact on ancient woodland or veteran trees and the species they support. These can include:*

- *breaking up or destroying connections between woodlands and veteran trees*
- *reducing the amount of semi-natural habitats next to ancient woodland and other habitats*
- *increasing the amount of pollution, including dust*
- *increasing disturbance to wildlife from additional traffic and visitors*
- *increasing light pollution*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *changing the landscape character of the area"*

Related to this application the Woodland Trust's concerns focus on:

- Development provides a source of non-native plants and aids their colonisation;
- Where the wood edge overhangs public areas, branches and even whole trees can be indiscriminately lopped/felled, causing reduction of the woodland canopy.
- Where gardens abut woodland or the site is readily accessible to nearby housing, it gives the opportunity for garden waste to be dumped in the woodland and for adjacent landowners to extend garden areas into the woodland. It creates pressure to fell boundary trees because of shade and leaf fall and interference with TV reception. It also forces boundary trees to be put into tree safety inspection zones resulting in costs for neighbours and increasingly comprehensive felling.
- There can be changes to the hydrology altering ground water and surface water quantities.

Mitigation

Natural England's Standing Advice on Ancient Woodland states:

"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*
- *protecting ancient and veteran trees by designing open space around them*
- *identifying and protecting trees that could become ancient and veteran trees in the future*
- *rerouting footpaths*
- *removing invasive species*
- *buffer zones"*

Buffering

This development should allow for a buffer zone of **at least 50 metres** to avoid root damage and to allow for the effect of pollution from the development. The buffer should be planted before construction commences on site. A fence should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles etc.

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."

By using the 15m alluded to in the Standing Advice, the applicant does not appear to have tailored the proposed buffer specifically for the proposed operations at this site.

For T136 and T137, the Trust would recommend that a Root Protection Area of 15x the Stem Diameter, or 5m beyond the crown (whichever is greater), is implemented in line with Natural England's Standing Advice.

Conclusion

The Trust **objects** to this planning application unless the applicant is able to provide the adjacent ancient woodlands with an appropriate buffer of 50m in line with Natural England's Standing Advice.

If you would like clarification of any of the points raised please contact us via campaigning@woodlandtrust.org.uk

Yours faithfully,

Isla King
Assistant Campaigner – Ancient Woodland