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| **Page 1** |

**The Woodland Trust**

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**Website**

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Aylesbury Vale District Council

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AYLESBURY

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7th September 2016

Dear Ms Britton

**16/02745/AOP | Outline application for mixed use development comprising offices, light industrial, general industrial and storage & distribution facilities (Use Class B1a, B1c, B2 & B8), education including on site student accommodation (D1 & C2), up to two hotels (C1), non retail promotional automotive display space (sui generis), a social hub (D2), parking and access arrangements, supporting infrastructure including highway and utilities improvements, demolition of existing structures, associated landscaping and other ancillary works**

As the UK's leading woodland conservation charity, the Woodland 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 and manage over 1,000 sites covering around 24,000 hectares (59,000 acres) and have 500,000 members and supporters. Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least AD1600. 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.

The Woodland Trust **objects**to the planning application on the basis of damage to Wild wood (grid ref: SP672429), an Ancient Semi Natural Woodland and Hazelborough Wood (known on the Ancient Woodland Inventory as Lodge Copse/The Straights at grid reference: SP663418.), which is ancient semi natural woodland and plantation on ancient woodland designated as such on Natural England’s Ancient Woodland Inventory (AWI) National Planning Policy Framework paragraph 118 states that “planning permission should be refused for development resulting in the **loss or deterioration of irreplaceable habitats**,

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| **Page 2** |

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 recently published (April 2014) Natural England Standing Advice for Ancient Woodland and Veteran Trees, paragraph 4.8.1 states: ‘Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodland:

• Is exceptionally rich in wildlife, and supports many rare and threatened species;

• May contain surviving descendants and features from the original natural forests;

• Acts as reservoirs from which wildlife can spread into new woodlands;

• Has valuable soils due to their undisturbed nature;

• Is an integral part of England’s historic landscapes and the biological and visual functioning of a landscape;

• Contains a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance;

• Contributes to people’s sense of place and imagination.’

Natural England’s Standing Advice on Ancient Woodland (April 2014), Section 6.4:

“Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required.

the permanent retention of buffer zones must be secured as part of the planning permission. These should be allowed to develop into semi-natural habitat. Developments such as gardens must not be included within buffer zones as there is limited control over how they may be used, or developed in the future; for example, they might be paved or decked without the need for planning permission or they may include inappropriate species which could escape into the woodland.”

For buffers to be effective they need to be designed on a case by case basis. The 15m buffer referred to in the Standing Advice was in relation to a housing development. There is no one size fits all approach to buffer design and each buffer will be unique to its location and the functions it is to fulfil. A good understanding of what needs to be protected is needed before any buffer construction takes place. Furthermore, once a buffer is constructed its effectiveness needs to be monitored and assessed and the results made available so that subsequent buffer designs can be amended and improved.

This buffer should be made up of at least 50% native tree cover which should be allowed to develop into a semi natural habitat. Around the trees of high value it should be maintained as scrub or grassland so that younger tree competition does not establish and compromise their crowns. These measures will help to protect the ancient woodland from the impacts of the adjacent development and are in line with the recommendations in the NPPF. In addition, a

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| **Page 3** |

larger buffer will also increase the available habitat onsite helping to contribute to an increase in biodiversity locally as well as mitigating the impacts of this development.

The non technical summary states the following:

NTS.16 A minimum 5 m wide strip of new tree planting will be provided along the north western edge of zone K next to buildings up to 12 m high, which will provide screening and act as a biodiversity corridor. For buildings above this height, the width of the buffer strip will increase, up to 10 m wide next to buildings up to 16 m high. A 5 m wide buffer will be retained along the south western boundary where zone K borders Hazelborough Woods. This area will be planted with native species to improve the existing woodland edge. A 5 m wide planted buffer will also be retained along the northern boundary of zone K. A minimum building set-back of 10 m from Dadford Road will be provided in the east of zone K. A new woodland planting / staff break-out area will be provided in the southern tip of zone K.

This buffering is inadequate to protect the ancient woodland due to the size and type of the proposed development we would recommend that a buffer at least 50m wide is included within the plans adjacent to both Wild Wood and Hazelborough Wood and that the buffer is planted before any building work commences on site. Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust **objects**to this proposal due to the direct loss of this irreplaceable habitat.

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

Yours sincerely,

Katharine Rist

Campaigner- Ancient Woodland