Woodland Trust Position

The Trust **objects** to this application due to:-

- deterioration of Long Spring (grid ref: TL 15621 09608) and Soothouse Spring (grid ref: TL 15423 09339), both designated as Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory (AWI)
- deterioration of veteran oak tree T14
- deterioration of our Woodland Trust site, Heartwood Forest, which includes four areas of ancient woodland – Langley Wood (grid ref: TL 16195 10924), Well Wood and Pudler's Wood (grid ref: TL 15793 11438), both designated as Ancient Semi Natural Woodland on the AWI, in addition to Pismire Spring (grid ref: TL 15427 11391 and Round Wood (grid ref: TL 16162 12053) which are currently unmapped ancient woodlands. These areas of woodland are also designated as County Wildlife Sites.

We appreciate this is an Outline application and there will be opportunities to address indirect impacts at later stages in the planning process. However, it is important to establish at this stage that the scheme can be designed to ensure impacts are fully mitigated.

Impact on Ancient Woodland

This development would introduce a considerable number of new dwellings and associated infrastructure in close proximity to a narrow strip of ancient woodland which is already bounded on its southern side by built development.

There will be a range of impacts to consider in due course, but at this stage in the planning process we are primarily concerned about the following impacts:-

- Intensification of activity adjacent to, and within, ancient woodland resulting in disturbance to breeding birds and other sensitive fauna, vegetation damage, removal of deadwood, predation and disturbance from cats and dogs, trampling, litter or fire damage
- Fragmentation of ancient woodland from the reduction in semi-natural habitat to the north of the woodland and the existing development to the south
- Traffic emissions resulting in increased deposition of air pollutants such as nitrogen oxide and ammonia, affecting woodland condition

Within the application we have found only a brief reference to ancient woodland impacts and mitigation. The Arboricultural Impact Assessment states: "*W1, Longspring Wood, identified as Ancient and Semi Natural woodland has been provided a 15 metre buffer within the Masterplan to avoid any detrimental impacts that development may cause.*"

We assume the reference to a 15 metre buffer is a reference to the **minimum** 15 metre buffer in Natural England and Forestry Commission's standing advice.[1] The standing advice is clear that larger buffer zones are more likely to be needed if **close to residential areas** or if a significant **increase in traffic** is anticipated. The assertion that a 15 metre buffer would "*avoid any detrimental impacts*" on the ancient woodland appears to be an unsupported statement.

For large developments, in the absence of an assessment by the applicant, we would suggest a buffer of **50 metres** as a precautionary principle, unless it can be clearly demonstrated that circumstances are such that a smaller buffer would suffice.

While the details of buffer planting can be decided at a later stage in the planning process, it is important to establish the feasibility of providing an appropriate width of buffer to mitigate

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

impacts on ancient woodland and to be clear about the extent to which access will be encouraged or deterred. These decisions will impact on the calculations of open space provision and need to be considered at Outline stage.

Key factors influencing buffer provision include:-

- housing mix and density
- nature and extent of existing development close to ancient woodland
- current use of the woodland
- position of the woodland within the landscape in relation to the development
- design of the development, including open space and options for recreation, dog walking and play

Some considerations for this particular development are outlined below.

Edge effects

Detrimental edge effects have been shown to cause changes in ancient woodland characteristics that penetrate into the woodland for a distance of up to three times the canopy height.

In a situation such as this, where the woodland is long and narrow (at its widest point Long Spring Wood is approximately 40 metres wide) the adverse impacts on the ecological condition of the woodland habitat will be particularly evident without strong mitigation.

Fragmentation

The proximity of new infrastructure on the northern boundary of Long Spring Wood, together with the existing commercial development on the southern boundary, will result in this area of ancient woodland being increasingly fragmented and separated from adjacent semi- natural habitat.

The applicant needs to demonstrate that the buffer will provide sufficient undisturbed habitat adjacent to the woodland to protect against gradual deterioration of the woodland's ecological condition.

Intensified public access and recreation

The design needs to demonstrate sufficient alternative open space to ensure future pressures on the woodland from the increase in people, dogs and cats associated with a development of 1000 houses can be mitigated. Whether, and to what extent, the buffer would be accessible to the public is also a key consideration in calculating open space provision and determining the appropriate scale of the development.

The Public Open Space Plan shows the ancient woodland and the 15 metre buffer zone as part of the provision of 'natural and semi-natural green spaces'. Ancient woodland is protected primarily for its biodiversity and ecological value, not for public amenity. Therefore, it is not appropriate to include irreplaceable habitat in the calculations of open space provision. We would suggest that the open space calculation should reflect only areas designed for public benefit and should exclude irreplaceable habitat.

Additionally, for a development of this size, part of the buffer should be treated as land that needs safeguarding rather than functioning open space. For example, if a 50 metre buffer is provided we would recommend **access is discouraged for a minimum of 15 metres** adjacent to the ancient woodland.

Impact on Heartwood Forest

We have significant concerns in relation to the impact of the development on the Woodland Trust's site at Heartwood Forest; a complex of woodlands including two areas of ancient woodland designated on the AWI (Langley Wood and Pudler's/Well Woods), and two currently

unmapped ancient woodlands Pismire Spring and Round Wood. We expect that these unmapped ancient woodlands will be included in Natural England's updated AWI.

Heartwood Forest was born in 2008 when the Woodland Trust purchased 345ha of land with the intention of creating England's largest continuous new native forest. Over the next ten years we worked with volunteers to plant 600,000 new trees. The young woodland now buffers and connects the four ancient woodlands referred to above that were part of the original land holding purchased in 2008. These four ancient woodlands, covering a total of 18 hectares, are also designated Local Wildlife Sites.

In addition to tree planting, the Woodland Trust created 70ha of open space of which 50ha was sown with wildflowers. These open spaces have developed into established meadows supporting a wide range of species, including Skylark and Barn Owl.

The Heartwood Forest species list is extensive and includes England's second largest butterfly, the Purple Emperor, and our smallest butterfly, the Small Blue. Nine species of bat have been recorded, including the Barbastelle Bat.

Key concerns in relation to impacts on Heartwood Forest are detailed below.

<u>Managing public access within Heartwood</u>
It will become increasingly difficult for the Trust to manage public access effectively and ensure that the condition of the woodland does not deteriorate.

Our current visitor zoning plan for Heartwood Forest is based on the main flow of visitors entering via the car park. We have accordingly set up our visitor infrastructure to align with this. We have also zoned some areas to receive less visitor footfall and to provide a quieter, less disturbed area for wildlife to flourish.

The application proposes a new bridleway to the south-west corner of Heartwood Forest. This will result in a quiet area of Heartwood Forest becoming much busier, with increased access and recreation impacting sensitive fauna and flora. For example, British Wildlife Vol 34 Number 7 June 2023 reported a study [2]finding that 40-50% fewer birds used areas close to footpaths. The newly connected area is also within easy reach of the ancient woodlands within Heartwood.

The Trust and its volunteers already invest considerable time in picking up litter arising from the existing level of use. Litter is not just unsightly, it has real consequences for wildlife. In a recent study, Keep Britain Tidy estimated that 2.9 million small mammals, such as shrews, hedgehogs and voles, are killed each year after getting stuck inside bottles and cans discarded within grassland and parks.

In addition to litter, increases in public access inevitably give rise to other forms of anti-social behaviour, including a heightened fire risk.

As a charity with limited resources and funding to manage our woodlands we are extremely concerned that Heartwood Forest will become further degraded as a result of this development.

<u>Deterioration of ancient woodland within Heartwood</u>

[2] Banks, P.B., & Bryant, J.V 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. Biology Letters 3: 611-613

The nature and extent of existing use and recreation within Heartwood has had devastating consequences on the ecology of the ancient woodlands.

In 2015 it became apparent that the increased footfall of visitors to Heartwood's ancient woodlands during bluebell season (April/May) was resulting in paths being significantly widened and bluebells destroyed. We conducted a study which mapped the areas where bluebells had been damaged or destroyed due to trampling. We found that across an area of 16 acres we had lost an acre of bluebells (equivalent to over 3 Olympic sized swimming pools).

Annex A includes images of bluebells growing within Heartwood Forest which illustrate the degradation occurring over time – in the first case, taking place over 24 hours; in the second case over a year; and lastly, over ten years. These images are provided to illustrate the severity of the degradation caused by inappropriate visitor behaviour. We can provide further background and information to the council if that would be helpful.

Each year we run a 'Save our Bluebells' campaign where we increase staff and visitor presence on-site during bluebell time to engage with visitors and encourage behaviours that cause less disturbance to fauna and flora. This already puts a heavy burden on staff time and the need for this will increase if we are to continue to protect the site as visitor access intensifies.

We are deeply concerned that the deterioration that will arise from increased public use and recreation within the ancient woodland areas of Heartwood, particularly in Langley Wood and Pismire Spring ASNW, will become unmanageable.

<u>Impacts on wildlife in other areas of Heartwood</u>
There is considerable open ground habitat at Heartwood Forest in the form of meadows and woodland rides. These support a wide variety of wildlife including important and threatened bird species such as Skylark and Barn Owl. Increased visitor numbers, especially with loose dogs, can be a considerable threat to the breeding success of important birds. The recent and dramatic decline of the skylark population means that it is now a Red Listed Species. Barn Owls have legal protection and are included in Schedule 1 of the Wildlife & Countryside Act 1981. Increased visitor numbers will lead to more trampling of flora along the rides that currently provide habitat for a wide variety of butterflies and other insects.

The applicant would need to demonstrate that the increase in visitor numbers to Heartwood Forest would not impact these and other important species.

<u>Hydrological Impacts affecting woodland ecology and health & safety</u>
Heartwood Forest benefits from several springs that feed the various ponds on site. The site is underlain by chalk bedrock and investigation following a recent collapse of an old capped well in the woodland highlighted that the geology of the area is prone to exhibit karstic features such as sink holes.

The wetland areas contribute to the wide-ranging species found on the site. For example, we have recorded more than 80 toads using one of the higher ponds. Woodcock (which require damp woodland) are present in some of the newly planted areas. Looking ahead, the Trust plans to take advantage of the natural springs on site and create new ponds within the site.

We are concerned to ensure that there will be no adverse hydrological impacts arising from the development which could:-

- have serious implications for ground stability and public safety
- disrupt the ecological conditions of Heartwood by affecting the water table, the springs and the presence of the ponds within the site.

We would recommend that before a decision is made on this Outline application the developer needs to demonstrate that it will be feasible to manage the hydrogeological

impacts of the development to ensure there will be no increased health and safety risks to users of the site or adverse impacts on woodland ecology.

Impact on veteran tree

Ancient and veteran trees are irreplaceable habitats and afforded a high level of protection in planning policy. They possess unique features which provide a rich and diverse range of habitats, playing host to countless other species. In particular, many rare invertebrate, fungi and lichen species are dependent on the decaying wood provided by such trees.[3] Veteran trees are disproportionately valuable parts of the natural environment and where they occur outside of woods they are also particularly important for landscape connectivity.[4] They are an essential part of our landscape and cultural heritage.

We are concerned to ensure veteran trees on site are suitably protected. While veteran oak tree T14 has been afforded a veteran tree buffer in line with Natural England and Forestry Commission's standing advice, the situation of the tree within the landscape will change considerably as a result of the development.

The tree is currently situated within a hedgerow between a field and the playing fields. This new development would result in the tree being closely bounded by an access road and residential areas immediately adjacent to the root protection area. As such, the development will lead to a significant increase in activity in the vicinity of tree. In turn this will increase the need to manage the tree for safety reasons, whilst the associated increase in footfall will likely impact the soils around the tree.

Key concerns include:-

- Future requirements for managing the canopy, including the removal of important habitat features such as deadwood
- Intensification of activity in the vicinity of the tree leading to compaction of soils, reduced soil porosity and reduced water, oxygen and nutrient delivery capability
- Changes to the surrounding hydrology resulting from the considerable increase in hardstanding in the vicinity of the tree in comparison to its existing situation

Veteran trees typically feature significant deadwood habitat of great value for biodiversity, e.g. retained deadwood in the crown, broken or fractured branches, trunk cavities and wounds. As they age, the trees will inevitably shed limbs and branches, presenting a risk to their surroundings. As such, the health and safety risks associated with these trees will change and result in a requirement for more intensive management. This will lead to a loss of habitat from sanitisation through removal of deadwood, as well as the potential for consequential decline or need for removal.

Our concerns in relation to T14 are supported by BS 5837 guidelines, which state: "*particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development*" and that "*adequate space should be allowed for their long-term physical retention and future maintenance*".

Planning Policy

The National Planning Policy Framework, paragraph 193, states: "*When determining planning applications, local planning authorities should apply the following principles:-*

[3] https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf
[4] Ancient and veteran trees. An assessment guide. (woodlandtrust.org.uk)

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[70] and a suitable compensation strategy exists;"

Footnote 70 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 in its current form this application does not comply with national planning policy.

The Council should also have regard to the following policies from the St Albans City & District Council Draft Local Plan 2041, Regulation 19 Publication September 2024:-

- **Strategic Policy SP1 - A Spatial Strategy for St Albans District**, which prioritises sustainable use of land, brownfield first, protection of Green Belt, habitat connectivity, biodiversity net gain, and green infrastructure.

- **Strategic Policy SP2 - Responding to the Climate Emergency**, which requires development to demonstrate mitigation/adaptation to climate change, biodiversity net gain, tree planting, and reduced reliance on private car use.

- **CE1 - Promoting Sustainable Design, Construction and Building Efficiency**, which emphasises low-carbon, nature-sensitive development including sustainable materials, water efficiency, and conservation of landscape.

- **Strategic Policy SP3 – Land and the Green Belt**, which states that Green Belt should only be released in exceptional cases. Development must protect the wider Green Belt and deliver compensatory enhancements — including tree planting and habitat protection.

- **LG1 – Broad Locations**, which requires protection of landscape and biodiversity, 1 tree per dwelling, sensitive design, and meaningful buffer zones. Also requires integration with surroundings, transport upgrades, and strong masterplanning.

- **CE2 - Renewable and Low Carbon Energy**, which states that major applications must show how they will maximise renewable energy and reduce carbon impact.

- **Chapter 10 – Natural Environment, Biodiversity and Green Infrastructure**, which supports protection of irreplaceable habitats (such as ancient woodland and veteran trees) and delivery of the Local Nature Recovery Strategy.

Conclusion

The Trust **objects** to this planning application on the basis of deterioration of ancient woodland, deterioration of our Heartwood Forest site (including four areas of ancient woodland), and deterioration of a veteran tree. This application contravenes national planning policy designed to protect ancient woodland and should be considered for refusal unless the applicant is able to provide clear and robust assessment to demonstrate that deterioration can be avoided.

Protection for ancient woodland is outlined within National Planning Policy Framework (NPPF) at paragraph 193c. This policy, and the standing advice, requires the avoidance of loss or

deterioration, not merely its minimisation. **The test is whether there would be a negative impact, not whether the magnitude of the impact is acceptable.** We consider that the application proposals are likely to increase disturbance within ancient woodlands during the operational life of the development and will therefore contribute to their deterioration, contravening national planning policy. We ask that the Council fully considers the potential impacts on ancient woodlands and ensures that the development will not result in any deterioration of the woodlands.

The Woodland Trust strives to manage Heartwood Forest for both people and wildlife, and we are currently managing to balance both of these objectives. However, we consider that Heartwood Forest has reached its visitor capacity and we are at a point where increased visitor access will have negative impacts on the ecological condition of the woodlands. The increased footfall resulting from the development will require extra visitor management techniques, which are likely to have only limited success in reducing the unfortunate negative consequences associated with intensified public access. Additionally, this would bring a significant financial burden to the Woodland Trust as we strive to manage Heartwood Forest for both people and wildlife.

Please contact us at planningcasework@woodlandtrust.org.uk to discuss any of the points raised in this letter.

Kind regards

C Johannesen
Programme Officer - Woods Under Threat

Annex A

Langley Wood ASNW bluebell degradation

Sunday 17th April 2016 8:25am

Monday 18th April 2016 5pm

Langley Wood ASNW bluebell degradation

2014

2015

Well Wood ASNW bluebell degradation

2010

2020 – superimposed over the 2010 image to show alignment of path