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12<sup>th</sup> March 2018

Dear Sir/Madam

### **Brentwood Draft Local Plan Preferred Site Allocations**

The Woodland Trust appreciates the opportunity to comment on the Brentwood Draft Local Plan Preferred Site Allocations consultation.

As the UK's leading woodland conservation charity, the 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 over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since 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. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

The Trust is concerned about a number of site allocations included in **the Brentwood Draft Local Plan** as they could lead to the damage and loss of ancient woodland.

### **Planning policy**

National Planning Policy Framework (NPPF) paragraph 118 states that "planning permission should be refused for development resulting 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."

The draft revised National Planning Policy Framework, published on 5th March 2018, further outlines the Government's commitment to improving protection for ancient woodland through the planning system. It states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists." This wording is a clear recognition from the Government of ancient woodland's importance and better need for protection.

Natural England's standing advice for Ancient Woodland and Veteran Trees<sup>1</sup> states: "Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

### **Impacts on ancient woodland**

Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of the removal of large areas of woodland, much of which contains high quality, valuable trees, to make way for the construction of this proposal.

When land use is changed to a more intensive use such as in this situation plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These detrimental edge effects can result in changes to the environmental conditions within the woodland and consequently affecting the wood's stable conditions. 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.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods.

Natural England's standing advice for Ancient Woodland and Veteran Trees states:

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

“Development can affect ancient woodland and veteran trees, and the wildlife they support, when it takes place on the site, or nearby. You can assess the potential impacts using this assessment guide and use this to help you with planning decisions.

Direct impacts of development on ancient woodland or veteran trees include:

- 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 around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

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
- 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”

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 Natural England recommend “leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland (depending on the size of development, a minimum buffer should be at least 15 metres).”

The size of a number of the site allocations suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent to site allocations is not affected by potential future development. Buffers should be constructed on a case-by-case basis rather than a ‘one size fits all’ approach.

## **Conclusion**

The Trust is concerned about the potentially adverse impacts that the proposed site allocations will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust **objects** to the inclusion of the below site allocations in the Brentford Draft Local Plan as they are likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this reason we believe the sites in the table below are **unsound and should not be taken forward**. We will maintain our objection until there is a commitment to either avoiding ancient woodland or providing suitable buffers to development. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

We hope you find our comments to be of use to you. The Woodland Trust is happy to provide any additional information or support regarding the protection of ancient woodland. If you require any further information regarding points raised within this document, then please do not hesitate to contact us.

Yours sincerely,

Jack Taylor  
 Campaigner - Ancient Woodland

Site reference number	Name of site	Nearest Town	Development description	Woodland adjacent or within?	Type of woodland affected (e.g. ASNW, PAWS, secondary) & grid reference
<b>081</b>	Council Depot, The Drive, Warley Brentwood CM13 3BH	Brentwood	Housing - 2.98 ha Masterplan opportunities (potential for mixed use) when considered along with adjoining sites 117A and 117B.	Adjacent to AW on eastern boundary	Type – ARW Name – Barrack Wood aka Harts/Kents Woods Size – 37.711702 ha Grid ref – TQ596917
<b>117A &amp; 117B</b>	Ford Offices, Eagle Way, Warley Brentwood CM13 3BW	Brentwood	Housing and employment - 8.09 ha Masterplan opportunities (potential for mixed use) when considered along	AW on eastern boundary. Approx. 12m buffer of woodland (non-AW).	Type – ARW Name – Harts/Kents Woods Size – 37.711702 ha Grid ref – TQ596917

			with adjoining sites 117A and 117B.		
<b>083</b>	Land west of Warley Hill, Pastoral Way Warley CM14 5HJ	Brentwood	Housing - 2.21 ha	AW 37m to West of site	Type – ASNW Name – Clements Wood Size – 1.490825 ha Grid ref – TQ588921
<b>263</b>	Land east of Chelmsford Road, Shenfield	Brentwood	Housing - 9.85 ha Opportunity to create a masterplan along with adjoining proposed allocations (site refs: 158, 034, 087, 235 and 276).	Adjacent to AW on south eastern boundary (length approx. 292m)	Type – ASNW Name – Arnold’s Wood Size – 1.56641 ha Grid ref – TQ621961
<b>034, 087, 235 and 276</b>	Officer’s Meadow, Land off Alexander Lane, Shenfield	Brentwood	Housing – 24.44 ha Opportunity to create a masterplan along with adjoining proposed allocations (site refs: 158 and 263)	Contains AW on eastern side of the site. Whole of this part of Arnold’s Wood included to provide contiguous site with Site ref. 263	Type – ASNW Name – Arnold’s Wood Size – 1.56641 ha Grid ref – TQ621961
<b>200</b>	Dunton Hills Garden Village	Brentwood	Mixed Use – New Garden Village community including housing, employment, specialist accommodation, local shops and supporting infrastructure. 257 ha	Contains AW	Type – ASNW Name – None Size – 3.084541 ha Grid ref – TQ645894
<b>101A</b>	Brentwood Enterprise Park (Former	Brentwood	Employment - 35.47 ha	Adjacent to AW on	Type – ASNW Name – Hobbs Hole

	M25 Works Site at A127/M25 junction 29)			western boundary	Size – 1.609243 ha Grid ref – TQ587881
<b>101C &amp; 101D</b>	Land at Codham Hall Farm		Employment – 0.61 ha (additional) Site ref: 101D to only be used as a landscaping area.	AW on western boundary. Landscaping buffer approx. 15m at closest point.	Type – ASNW Name – Codham Hall Wood Size – 5.115816 ha Grid ref – TQ584887