



North Herts Council
PO Box 10613
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15th January 2025

Dear Tom Rea

Reference: 24/02343/FP

Proposal: Change of use of existing site from agricultural to use Class B8 (Storage and Distribution). Extensions and alterations to existing barns; erection of detached temporary structure of three years and supporting substation and concrete base. Installation of hardstanding for outside storage and parking and installation of electric front entrance gates. Drainage pond and associated outfall pipe, alterations to surface access track (Development has commenced). | Church Wood Three Houses Lane Codicote Hertfordshire

Holding Objection – loss and deterioration of potentially unmapped ancient woodland

The Woodland Trust is the UK's largest woodland conservation charity and a leading voice in bringing to the attention of government, landowners and the general public the state of the UK's woods and trees. 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 planning expertise to assess the impacts of development on ancient woodland and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of a planning application.

Woodland Trust Position

We would like to register a **holding objection** to this proposal due to loss and deterioration of Church Wood (grid ref: TL 21377 20587) and Crouchgreen Wood (grid ref: TL 21292 20556), which we consider may be unmapped ancient woodlands.

Both woods appear on the first edition county series maps published between 1843 and 1893 (Epoch 1). Whilst not present on Natural England's Ancient Woodland Inventory, the long-standing presence of these woodlands suggests that they are likely to be of historical and ecological importance and may be unmapped ancient woodland. The Preliminary Ecological Appraisal notes that these woodlands contain ancient woodland habitats, historic coppice, evidence of ancient and old-secondary woodland habitat, and associated indicator species.

Impact on Ancient Woodland

This application is similar to withdrawn application, reference 24/01002/FP, although it appears to include more development and a more extensive site boundary. The Woodland Trust commented on the previous withdrawn application on 11th September 2024.

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In our response we advised the applicant to consult Natural England for their opinion on the antiquity of the woodland. This application does not contain any information to demonstrate that consultation with Natural England has taken place, or evidence the outcome of any such discussions.

If Natural England designates the woodlands as ancient, then the applicant would need to submit revised plans clearly showing the boundary of the areas designated as ancient, and the location of the proposed development in relation to these boundaries.

Additionally, we are concerned that an arboricultural impact assessment has not been completed to accompany this application. The assessment should consider potential direct and indirect impacts of the proposals on the woodland in addition to identifying any ancient or veteran trees which could be impacted by the development.

The Woodland Trust would be happy to review any new/clarified proposals in the light of the above information, to ensure that the development will not result in any detrimental impact on surrounding ancient woodland in line with paragraph 193 of the National Planning Policy Framework (NPPF) and Natural England and Forestry Commission's standing advice¹.

Planning Policy

The National Planning Policy Framework, paragraph 193, 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 reasons⁷⁰ 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, until the status of the woodlands is determined, consideration of the application should be deferred on the grounds that it may not comply with national planning policy.

Ancient Woodland

Ancient woodland is an irreplaceable resource of great importance for its wildlife, soils, recreational and cultural value, historical and archaeological significance, and the contribution it makes to our diverse landscapes. It is a scarce and threatened resource, covering only 2.5% of England's land area, and has a high level of protection in planning policy.

Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and woodlands, define ancient woodland as follows within their standing advice:-

"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

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

threatened species); soils; 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:-

- *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”*

In May 2022, the Government published an updated policy statement on ancient woodland, entitled ‘Keepers of Time: ancient and native woodland and trees policy in England’². The Government’s ‘Keepers of Time’ policy accentuates the importance of ancient woodland, stating: *“Ancient woodlands, ancient wood pastures and parkland and ancient and veteran trees are irreplaceable habitats which must be protected. Their long-standing presence, species and form serve as a rich cultural record of past management practices.”*

As a result of its great age, ancient woodland is characterised by a unique, complex and irreplaceable ecosystem of plants and animals, both above ground and in the soils. It is therefore impossible to recreate the ecosystem of an ancient woodland by planting new woodland. This is widely recognised by experts and by Natural England and the Forestry Commission in their joint standing advice.

Conclusion

Ancient woodland is an irreplaceable habitat; once lost it is gone forever. As such, it should be protected from any form of development that will result in its loss or deterioration.

The Trust **objects** to this proposal on account of loss and deterioration of potentially unmapped ancient woodlands. There is no wholly exceptional reason for the development in this location and as such, until the status of the woodlands is determined, consideration of the application should be deferred on the grounds that it may not comply with national planning policy.

We hope you find these comments helpful - if you would like to discuss any of the points raised, please contact us at planningcasework@woodlandtrust.org.uk

Kind regards

Cathy Johannesen
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² <https://www.gov.uk/government/publications/keepers-of-time-ancient-and-native-woodland-and-trees-policy-in-england/keepers-of-time-ancient-and-native-woodland-and-trees-policy-in-england>