

Nottinghamshire County Council
Planning
Trent Bridge House
Fox Road
West Bridgford
NG2 6BJ

12th October 2017

Dear Mr Meek,

Application: ES/3712

Proposal: The extraction and processing of sand and gravel, including the construction of a new site access road, landscaping and screening bunds. Mineral washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas.

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 1,000 sites across the UK, covering around 24,000 hectares (59,000 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. We aim to prevent damage, fragmentation and loss of these finite irreplaceable sites.

The Woodland Trust **objects** to the proposed quarry on the grounds of disturbance to Brandshill Wood (grid ref: SK 531334) which is covered by a group TPO. Although the woodland is not registered as ancient on Natural England's Ancient Woodland Inventory, the Trust is of the opinion that the site can be considered to be ancient woodland.

Brandshill Wood is present on both the First Edition OS Map (see map attached below) and maps from 1812, providing evidence that the site has been wooded for at least 200 years, and therefore the Trust believes that the site should be designated as ancient woodland. The Trust recommends that the applicant begins a discussion with Natural England, to determine the antiquity of the site, and await their decision on the designation of the wood. Until such time as the information has been provided to Natural England and determined, the planning application should not be decided. Upon designation, the Ecological Impact Assessment should be revised to highlight Brandshill Wood's ancient woodland status.

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Planning policy

National Planning Policy Framework, 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."

Nottinghamshire County Council's Adopted Minerals Local Plan, Chapter 3: Environmental Protection states that "Ancient woodlands comprise areas of continuous woodland since at least 1600, other than underwood clearing and timber production. These represent an irreplaceable resource. Nearly all of these have been designated as being of either national or local importance and are therefore protected from mineral extraction by policies M3.18 – M3.20 below."

"POLICY M3.18 SPECIAL AREAS OF CONSERVATION

Planning permission will not be granted for minerals development which would destroy or significantly adversely affect a Special Area of Conservation or a candidate Special Area of Conservation unless:

- (a) There is no alternative solution; and
- (b) There are imperative reasons of overriding public interest; and, if the site hosts a priority habitat or species:
- (c) There are overriding reasons of human health and public safety; and
- (d) There are beneficial consequences of primary importance for the environment.

The assessment of any adverse impact will take account of the scope for mitigation and/ or compensatory measures to replace the loss."

Impacts to ancient woodland

The Woodland Trust is concerned about the following impacts to Brandshill Wood:

- Noise and light pollution occurring from the adjacent quarry, during both construction and operational phases, particularly from the use of heavy machinery.
- Changes to the surrounding area's hydrology, ground water and surface water quantities being affected. The introduction of water run offs can also result in changes to the characteristics and quality of the surface water as a result of pollution/contamination etc. The Trust is particularly concerned that this will occur due to the location of the soil bund adjacent to Brandshill Wood, which could suffer significant impacts of this nature, as well as soil compaction.
- Ancient woodland soils are highly important environments as they have developed over hundreds of years. They support complex relationships between species above and belowground and are sensitive to change. As such, development within or directly adjacent to the boundary of Brandshill Wood will have a detrimental impact on these soil communities.
- The proximity of the extraction to the woodland will result in increased fragmentation due to the intensification of the landscape. The quarrying will result in the loss of nearby semi-natural habitats such as small wooded areas, hedgerows, individual trees and wetland habitats.
- The requirement of heavy machinery for the movement of the extracted material and general quarrying activity will increase vehicle emissions in the area, and facilitate dust distribution across the landscape.

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- Any effect of development 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:

"Impacts of development nearby can include these effects on the trees and woodland, and the species they support:

- compacting the soil around tree roots
- breaking up or destroying connections between woodland and other habitats
- reducing the amount of semi-natural habitats (like parks) next to ancient woodland
- changing the water table or drainage
- 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 or tree (depending on the size of development, a minimum buffer should be at least 15 metres)."

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, not a large industrial/mineral extraction proposal. While a buffer has been included within this planning application, it doesn't appear to be of an adequate size for the scale of this quarry.

The proposed quarry being built in such close proximity to the ancient woodland will further border the ancient woodland's western edge. The change of land to this much more intensive land use will subject the ancient woodland to a number of adverse impacts. Without suitable mitigation measures in place the ancient woodland could be irreversibly damaged and suffer considerable degradation in the long-term.

This more intensive land use would expose plant and animal populations to environmental impacts from outside of the woodland; these external influences are typically known as 'edge effects'. These harmful edge effects can result in changes to the environmental conditions within the woodland, 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.

In order to provide appropriate protection from the quarry, a **buffer of at least 100m** should be implemented, and should comprise a semi-natural habitat strip between the woodland edge and the development to protect Brandshill Wood. This should be made up of at least 50% tree cover, planting this area if necessary. This will help to protect the ancient woodland from the impacts of the adjacent development, in line with the recommendations in the National Planning Policy Framework and Natural England's standing advice.

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Conclusion

In summary, the Woodland Trust **objects** to the proposed quarry and associated buildings on the grounds of disturbance to Brandshill Wood, an area of unmapped ancient woodland.

The Trust will maintain an objection until the following conditions are met:

- Phase 1 and 3 of the works are conducted at least 100m away from the border of Brandshill wood, to reduce the impact of noise and dust on the woodland.
- The mineral washing plant is located at least 100m away from the woodland, to reduce the adverse effect from industrial development.
- The proposed location of the landscaping bund should be moved to a more appropriate site, to reduce the potential for soil compaction and hydrological issues within Brandshill Wood.

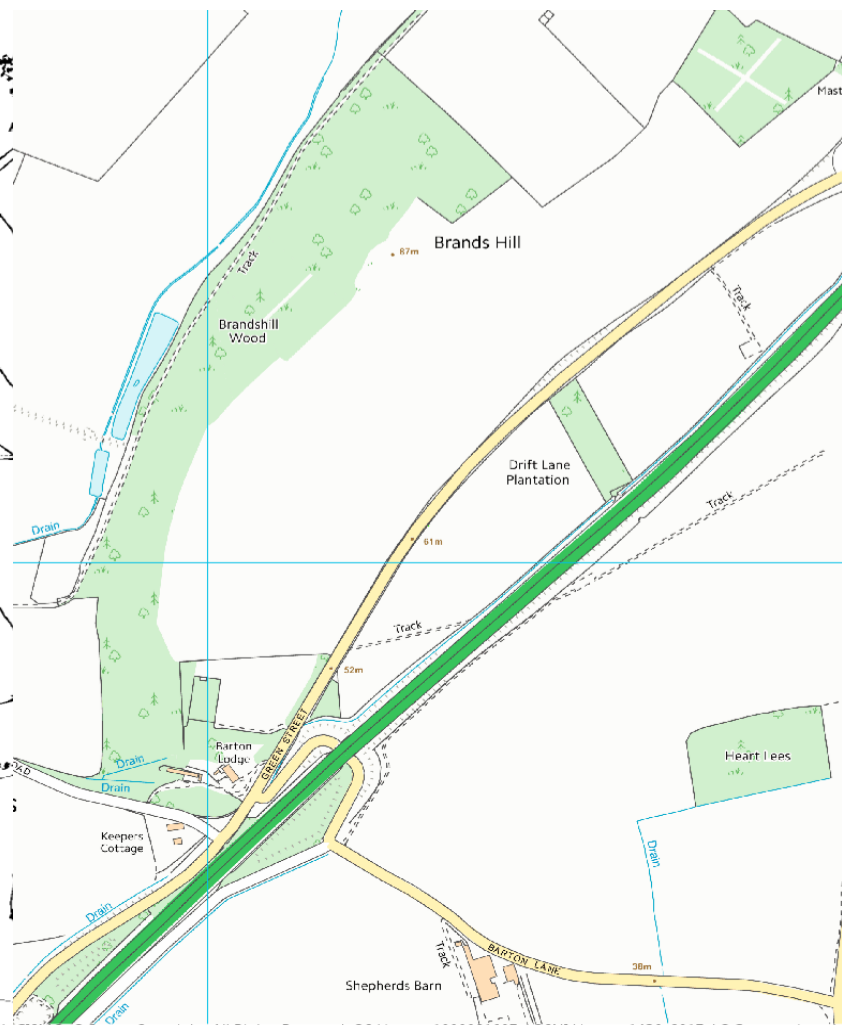
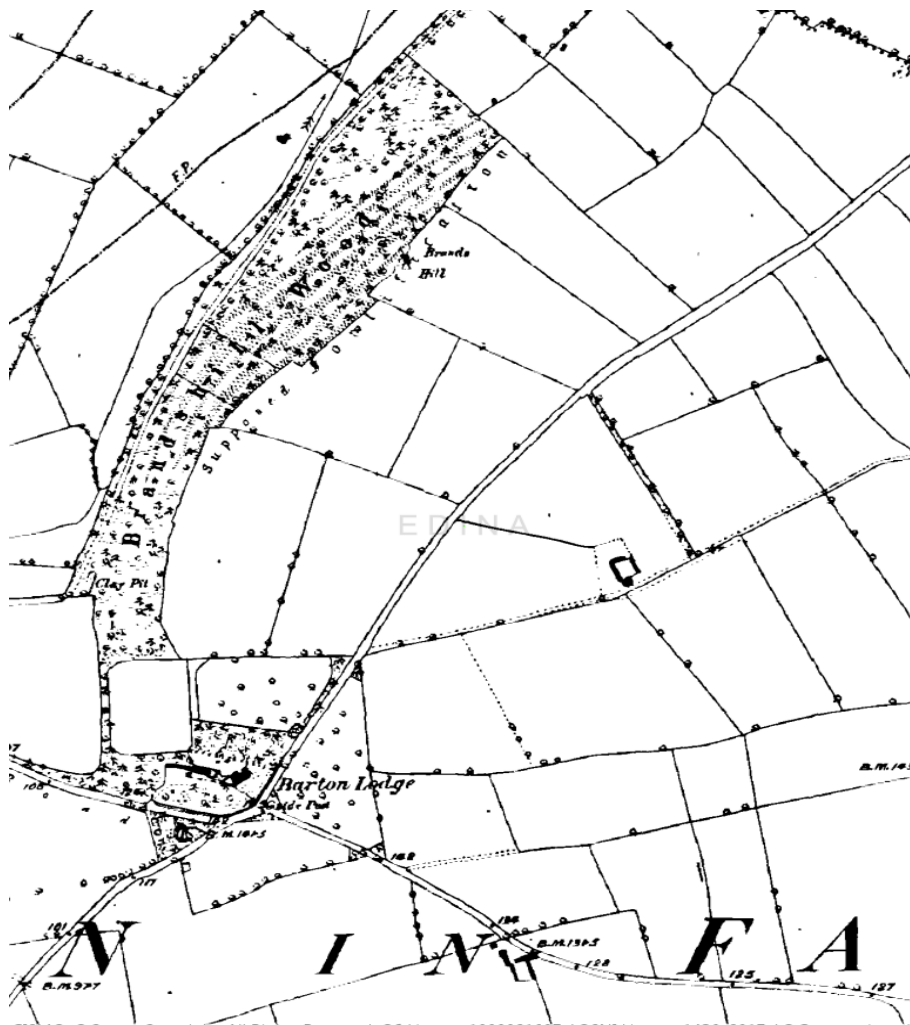
We hope you find our comments of use to you, if you have any issues regarding our comments please do not hesitate to get in touch.

Yours sincerely,

Nicole Hillier

Assistant Campaigner - Ancient Woodland

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Comparison of Brandshill Wood visible on the 1st Edition OS map vs. current OS mapping.