



Three Rivers District Council
Planning and Development
Three Rivers House
Northway
Rickmansworth
WD3 1RL

12th November 2025

Dear Claire Westwood

Reference: 24/2073/OUT

Proposal: Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters). | Land To North Of Little Green Lane Croxley Green WD3 3SP

Thank you for re-consulting the Woodland Trust on the revised proposals. We have reviewed the additional information and confirm that we **maintain our objection** to this application.

Our concerns relate to the impact of the development on ancient woodland and veteran trees, in addition to the impact on sites owned and managed by the Woodland Trust. We have summarised our concerns below, followed by more specific detail to illustrate the key points. Please also refer to our original objection letter dated 18th February 2025.

Summary

It is important at Outline stage to demonstrate that it will be **feasible** to mitigate impacts on ancient woodland and veteran trees. This requires a baseline assessment of the nature and scale of impact. However, it remains the case that the applicant has not assessed the impacts of this development on ancient woodland.

Various mitigation measures are proposed in the 'Woodland Recreational Management Plan' and the applicant suggests that the scope and detail of these mitigation options can be agreed at Reserved Matters stage further to ongoing dialogue with the Woodland Trust or other landowners. It is also suggested that elements of the proposed mitigation could be secured by obligation, including agreement with the Woodland Trust.

At this stage we can confirm that we have not received any communication from the applicant or request to discuss the proposals. But in the absence of an assessment of impact it would nevertheless not be possible to consider whether the proposals for mitigation

Telephone

01476 581111

Facsimile

01476 590808

Website

woodlandtrust.org.uk

(including buffer width and treatment and the types of measures suggested in the Woodland Recreational Management Plan) would be sufficient to prevent deterioration of the ancient woodlands within and adjacent to the site.

We therefore do not consider there is sufficient information for the planning authority to determine the application in line with the National Planning Policy Framework. Additionally, it is not possible for the Woodland Trust to assess the adequacy of the mitigation measures proposed specifically for our own sites.

Please find further detail below.

Lack of assessment of impacts on ancient woodland

In response to the concerns detailed in our original letter the applicant states that: -

“An impact assessment and outline mitigation solutions have been provided in the form of this Management Plan, based on our site scoping visit, to provide a robust framework for further dialogue with the Trust and other relevant stakeholders. It is not therefore considered that detailed visitor modelling would be required, particularly at this outline stage of planning, as the pressures on the surrounding Ancient Woodlands can be predicted, through desk-based, site-based and stakeholder input who would have local knowledge of the site conditions.”

We consider that it is precisely at this stage of the planning process that visitor modelling is required. If this is carried out at Reserved Matters stage when the buffer proposals have already in principle been agreed then it may not be possible for the supporting mitigatory measures to ensure there is no deterioration of ancient woodland. Whereas the Woodland Recreational Management Plan outlines the generic types of impacts that might be expected to arise and comments on how the existing condition of the ancient woodlands is currently being impacted by public access and recreation, it does not analyse the extent or nature of specific impacts likely to arise from this development.

We note the Woodland Recreational Management Plan refers to “RS 2025 EcIA” as providing a “detailed account of predicted impacts to surrounding Ancient Woodlands, including those arising from the operational phase of the Scheme, such as recreational and urban edges pressures resulting from a local increase in population size”. We have not been able to locate this document. However, we note that the Ecological Impact Assessment submitted in 2024 did not include an assessment of the increase in population and associated impacts.

Although the Woodland Trust may be able to provide estimates of the current usage of woodlands managed by us, and information about the impacts our woodlands are currently experiencing, it is not for the Woodland Trust to estimate the likely increase in people, dogs and cats, or their behaviours, arising from this particular development. It is for the applicant to provide such an assessment.

In the absence of such an assessment it is not possible to determine whether the proposed mitigation will be adequate.

Lack of justification for proposed buffer width

A development of up to 600 dwellings, schools, healthcare, retail and parking will significantly change the nature of activity adjacent to and within the woodlands. There is no discussion in the application to demonstrate that a 30 metre buffer (rather than, for example, 40 metres or 50 metres or some other width) is appropriate for a such a key mitigatory design feature.

We raised concerns in our original objection that the applicant has not demonstrated the buffer widths would be sufficient to mitigate impacts. The applicant has responded that buffer zones are not intended as the sole deterrent.

It is of course good practice to provide supporting mitigatory measures, however, a key factor in mitigating impacts arising from development adjacent to ancient woodland is designing an appropriate buffer zone. Buffer zones can be secured and planted at the beginning of a development, before construction or occupation, and with good design and sufficient width can provide both ecological enhancement to the ancient woodland and additional open space to absorb increased footfall. The standing advice, which describes a number of mitigatory design interventions, provides particular advice on the use of buffer zones.

We also note a lack of clarity across the documentation with regards to buffer width, infrastructure encroachment, and the extent to which access would be encouraged or deterred. To illustrate, the Preliminary Arboricultural Impact Assessment states: *"ASNW buffers will be kept semi-natural in terms of landscape design, with no play or recreational areas located within the 30m."* However, plans appear to show LEAPs and allotments adjacent to the 15 metre buffer, and in some cases fencing adjacent to the woodland. The Design and Access Statement states: *"A mown grass edge should be retained around the ancient woodland located within the Site to enable informal access to the woodland edge and interactions with nature."*

The proposals for buffer widths, degree of encroachment, and the extent to which buffer zones contribute to available public green space or ecological enhancement, need to be clearly and consistently set out. The plans should also show distances from the boundary of the ancient woodland to the closest infrastructure.

Impacts on Veteran Trees

We note the Woodland Recreational Management Plan states: *"This Management Plan does not consider in detail consultee concerns to veteran and mature trees within the Site. It is understood that an Arboricultural Technical Note in this respect has been submitted to TRDC by Tyler Grange on 11th March 2025."*

We are unable to find this Technical Note and it appears that the amended Preliminary Arboricultural Impact Assessment does not address our concerns on veteran trees.

Conclusion

The Trust **maintains an objection** to this application due to deterioration of ancient woodland and veteran trees. Until such time as the application is supported by an evidence-based assessment, it is not possible to determine whether this development could be delivered in accordance with the National Planning Policy Framework. As such in its current form we consider that the application should be refused.

Please contact us at planningcasework@woodlandtrust.org.uk if it would be helpful to discuss any of the points raised.

Kind regards
Cathy Johannesen
Programme Officer - Woods Under Threat