

Land to the North of Little Green
Lane, Croxley Green,
Rickmansworth, Hertfordshire

Woodland Recreational Management
Plan (Outline)



Client:

Richborough

Report Reference:

RSE_8239_R2_V2

Issue Date:

October 2025

PROJECT

Client: Richborough

Project: Land to the North of Little Green Lane, Croxley Green, Rickmansworth, Hertfordshire

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EXECUTIVE SUMMARY

- i. This Woodland Recreational Management Plan (Outline) has been prepared by RammSanderson Ecology Ltd on behalf of Richborough to accompany an outline planning application for a residential development (the Scheme) on land to the North of Little Green Lane, Croxley Green, Rickmansworth, Hertfordshire (the Site). This Management Plan considers potential recreational and urban edge pressures arising from the Scheme to surrounding Ancient Woodlands and identifies proportionate measures for avoidance, mitigation and long-term management.
- ii. This Management Plan has been prepared in response to consultee comments from the Woodland Trust, Forestry England and the Principal Trees and Woodland Officer at Three Rivers District Council (TRDC). Within their consultee response, the Woodland Trust identified their ownership of sizable parcels of Ancient Woodland located directly to the west and north-west of the Site and further highlighted particular concern of the long-term effects of the Scheme on the integrity of their Ancient Woodlands, particularly from recreational and urban edge pressures from a local increase in population size.
- iii. This Management Plan sets out the legislative and planning policy context for Ancient Woodland within England, describes the statutory and non-statutory protection of the Ancient Woodlands surrounding the Site and defines a baseline for the Ancient Woodlands based on desk-top data and a site scoping visit undertaken by RammSanderson in June 2025. This Management Plan then identifies and characterises the potential recreational and urban edge pressures to surrounding Ancient Woodlands because of the Scheme during its operational phase, with reference to the consultee comments.
- iv. The fundamental objective of this Management Plan is to specify outline measures to mitigate recreational and urban edge pressures from the Scheme on surrounding Ancient Woodlands, including a minor stand of onsite Ancient Woodland which has been retained and incorporated within the Scheme design. The design of the outline measures has been informed by the submitted Illustrative Masterplan (Appendix 1) and Landscaping Strategy for the Scheme (Appendix 2), the gathered baseline and the scoping site visit by RammSanderson, which assessed the current condition of and the existing pressures to, the surrounding Ancient Woodlands.
- v. Outline mitigation measures are split into two parts within this Management Plan:
 - Onsite mitigation measure proposals which can be directly controlled, funded and managed long-term by the Planning Applicant (and/or Management Company) and secured by TRDC (the Planning Authority) through standard planning obligations.
 - Offsite mitigation options predominantly within adjacent Ancient Woodland, which would require indirect funding by the Planning Applicant and securing by TRDC through a legal agreement(s), such as a Section 106, and liaison with the landowners.
- vi. The onsite outline mitigation measure proposals have to date been captured within the Ecological Impact Assessment report produced by RammSanderson (RSE_8238_R1_V4) in support of outline planning and have thus been expanded upon in this Management Plan, to provide a framework for detailed design. It is the intention that the onsite outline mitigation proposals would be secured by planning condition and commuted sums pursuant to a Reserved Matter application, with their detailed design, management and monitoring captured through the submission of a Detailed Woodland Recreational Management Plan with supporting detailed landscape plans and specifications.
- vii. The offsite outline mitigation described within this Management Plan defines potential options to mitigate recreational and urban edge pressures to the surrounding offsite Ancient Woodlands, with a focus on Dell Wood

owned by the Woodland Trust, proximal to the Site. It is not the intention of this Management Plan to dictate to the Woodland Trust how their woodlands should be managed but rather provide a framework through which the offsite mitigation options, informed through a RammSanderson scoping site visit, can be developed through further dialogue with the Trust. It is intended that the scope and detail of the offsite mitigation options would be agreed as part of a grant of Reserved Matters planning consent and further secured and funded through an appropriate legal agreement, further to ongoing dialogue and consultation with the Planning Applicant, the Trust (or other landowners) and the various stakeholders in the process.

- viii. To conclude, this Management Plan summarises and responds to the consultee comments from the Woodland Trust, Forest Commission and TRDC Principal Tree and Woodlands Officer, with reference to the outline mitigation solutions presented.
- ix. This Management Plan focusses on recreational and urban edge pressures to the surrounding Ancient Woodlands and defines workable outline mitigation solutions. This Management Plan does not include an assessment of impacts and mitigation measures to surrounding Ancient Woodlands during the construction phase of the Scheme, as this has been covered in the submitted RammSanderson EcIA. Other limitations are described in the main body of this Management Plan.
- x. This Management Plan and the site scoping visit has been undertaken by Steven Weber BSc (Hons) MCIEEM MArborA, Associate Director at RammSanderson, who has been a professional ecologist and arboriculturist for over 18 years and has provided professional advice for several development projects relating to Ancient Woodland and Ancient/Veteran trees.

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1 INTRODUCTION

1.1 Terms of Reference

- i. This Woodland Recreational Management Plan (Outline) has been prepared by RammSanderson Ecology Ltd on behalf of Richborough to accompany an outline planning application for a residential development (the Scheme) on land to the North of Little Green Lane, Croxley Green, Rickmansworth, Hertfordshire (the Site). This Management Plan considers potential recreational and urban edge pressures arising from the Scheme to surrounding Ancient Woodlands and identifies proportionate measures for avoidance, mitigation and long-term management.

1.2 The Scheme

- i. The Scheme comprises an outline application for up to 600 residential dwellings (Use Class C3(a)), a 5-bedroom property for children's social care and supported living (Use Class C3(b)) – see Appendix 1. 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 a medical centre (Use Class E(e)), community building (Use Class F2), retail and café 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. All matters are reserved except for vehicular access.

1.3 The Site

- i. The Site lies directly to the north of Croxley Green and extends to approximately 40 hectares, comprising predominantly arable cropland. The Site is enclosed by offsite Ancient Woodlands along its western and northern boundaries. Within the eastern part of the Site, a minor stand of onsite Ancient Woodland is set within cropland. A central internal hedgerow runs north-south through the Site, with further hedgerows defining much of the perimeter along highway boundaries. Veteran and mature broadleaved trees are associated with the internal hedgerow and the onsite Ancient Woodland.
- ii. To the south, the Site is bounded by Little Green Lane, beyond which lies the existing urban edge of Croxley Green residential area. Rousebarn Lane forms the eastern and north-eastern boundary, beyond which there is a belt of woodland, a golf course, Cassiobury Park and the urban edge of Watford, located further to the east.
- iii. Beyond the enclosing Ancient Woodlands along the western and northern Site boundaries, the landscape is characterised by a mosaic of farmland punctuated by farmsteads, villages and further stands of Ancient Woodland connected through hedgerow networks. The M25 motorway is located around 1.6 km to the north-west of the Site.

1.4 Planning History and Consultee Comments

- i. An outline planning application for the Scheme was submitted to Three Rivers District Council (TRDC) on the 24th of December 2025 and was validated on the 16th of January 2026 (Ref: 24/2073/OUT). The application has to date not been determined.
- ii. An Ecological Impact Assessment report (EclA) was submitted by RammSanderson in 2025 (the RS 2025 EclA) alongside the outline planning application, which in part included assessments of, and broad proposals for, the mitigation of recreational and urban edge pressures to Ancient Woodlands surrounding the Site. Subsequently, planning comments were received from the following consultees, which included specific commentary on the surrounding Ancient Woodlands:

- Hertfordshire Country Council (HCC) LEADS Ecology Advisor.
 - TRDC Principal Trees and Woodlands Officer.
 - The Woodland Trust.
 - Forestry England.
- iii. The date of each consultation and a concise consultation summary is provided in Table 1 below, with respect to specific commentary relating to Ancient Woodland. The full consultee responses are provided in Appendix 4. This Management Plan considers the consultee concerns relating to recreational and urban edge pressures to surrounding Ancient Woodlands and identifies proportionate measures for avoidance, mitigation and long-term management. This Management Plan concludes by summarising and responding to the consultee comments in more detail, with reference to the outline mitigation solutions presented (Section 5).
- iv. The Chilterns Conservation Board also raised concerns in respect of recreational pressures, but to the River Gade located offsite further to the east of the Site. A response to the Chilterns Conservation Board concern is also provided in Appendix 4.

Table 1 Consultee Comments Relating to Ancient Woodland

Consultee	Date	Consultee Outcome with Summary
HCC LEADS Ecology Advisor.	10/02/2025	No objection. Planning conditions recommended in respect of Ancient Woodland, including a Construction Ecological Management Plan, a Mitigation and Monitoring Strategy for Ancient Woodland and a Habitat Management and Monitoring Plan.
Forestry England.	17/02/2025 & 11/06/2025	Neutral. Site specific concerns with respect to Ancient Woodland included development buffer design and the fragmentation of the onsite Ancient Woodland, as well as increases in recreational pressures to the woodlands. Recommended an assessment of impacts to the woodlands.
Woodland Trust.	18/02/2025.	Objection. Identified their ownership of sizable parcels of Ancient Woodland located directly to the west and north-west of the Site. Concerns of the long-term effects of the Scheme on the integrity of their Ancient Woodlands, particularly from recreational and urban edge pressures. WT woodlands of main concern: Dell Wood (given its proximity to the Site) and to a lesser extent, Merlin's / Newlands Spring Wood. Although not owned by the WT, Long Newlands Spring Wood was also expressed as an area of concern, given its proximity to the Site. Concluded that further assessment was required.
TRDC Principal Trees and Woodlands Officer.	02/04/2025	Neutral. Concerns identified included the long-term impacts to surrounding Ancient Woodlands because of recreational and anti-social behaviour pressures resulting from the Scheme. Various mitigation measures recommended.

1.5 Zone of Influence: Scoped-In Ancient Woodlands

- i. The Zone of Influence (Zoi) is used to describe the geographic extent of potential impacts of a proposed development. In respect of the proposed Scheme and potential recreational and urban edge pressures to the surrounding Ancient Woodlands, this has been defined by the consultee comments described in the previous section, specifically the comments from the Woodland Trust (Appendix 4).
- ii. Figure 1 (Ancient Woodland Location and Ownership Plan) therefore describes the Ancient Woodlands proximal to the Site determined to be within the ZOI and further defines ownership and the level of designation (see also Table 2).

Table 2 Scoped-In Ancient Woodlands within the Zone of Influence

Site Name	Ownership	Designation	Location ¹	Concise Description
Green Lane Wood.	Planning Applicant	LWS ²	Within Site the boundary.	Ancient semi-natural broadleaved woodland, mainly of oak (both Pedunculate Oak and Sessile Oak) with some Ash, Silver Birch, Field Maple and Hazel coppice.
Long Newlands Spring Wood.	Unknown	LWS	Directly adjacent to the southwestern Site boundary.	A complex of connected ancient semi-natural woodlands, including Dell Wood, Newlands / Merlin's Spring Wood and Harrocks Wood.
Dell Wood.	Woodland Trust	LWS	Directly adjacent to the western Site boundary.	A complex of connected ancient semi-natural woodlands, including Long Newland's Spring Wood, Newlands / Merlin's Spring Wood and Harrocks Wood.
Newland / Merlin's Spring Wood.	Woodland Trust	LWS	Partly adjacent to the northwestern Site boundary, but largely offsite, 350m west.	Part ancient semi-natural (Merlin's Wood) and part mostly old secondary woodland (Newlands Spring Wood). A complex of connected ancient semi-natural woodlands, including Long Newlands Spring Wood, Dell Wood and Harrocks Wood.
Whippendell Wood.	Watford Borough Council	SSSI ³	Adjacent to the northern Site boundary, but beyond Rousebarn Lane.	An ancient woodland site which retains large areas of semi-natural vegetation, with oak/hazel/ash and oak/hornbeam being the major stand types.
Harrocks Wood.	Woodland Trust	LWS	Offsite, 1km northeast.	A complex of connected ancient semi-natural woodlands, including Long Newland's Spring Wood, Dell Wood and Newlands / Merlin's Spring Wood.

1.6 Scope of Management Plan and Limitations

- i. This Woodland Recreational Management Plan (Outline) focusses on recreational and urban edge pressures to the surrounding Ancient Woodlands and defines workable outline mitigation solutions. In consideration of the outline stage of the Scheme planning application, it is the intention of this Management Plan to deliver a robust

¹ From the Site boundary

² Local Wildlife Site

³ Site of Special Scientific Interest

framework for detailed mitigation design at a Reserved Matters stage, and further open dialogue for stakeholder consultation and identify channels for securing mitigation solutions.

- ii. This Management Plan does not include an assessment of impacts and mitigation measures to surrounding Ancient Woodlands during the construction phase of the Scheme, nor measures for the control of artificial lighting (as identified in some consultee comments), as this has been covered in the submitted RS 2025 EclA.
- iii. 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.

1.7 Management Plan Author

- i. This Management Plan and the site scoping visit has been undertaken by Steven Weber BSc (Hons) MCIEEM MArborA, Associate Director at RammSanderson, who has been a professional ecologist and arboriculturist for over 18 years and has provided professional advice for several development projects relating to Ancient Woodland and Ancient/Veteran trees.

2 LEGISLATIVE, POLICY AND STANDING ADVICE – ANCIENT WOODLAND CONTEXT

2.1 The National Planning Policy Framework (NPPF) December 2024

- i. In respect Ancient Woodland and the NPPF, para. 193 (c) states:

‘... 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 and a suitable compensation strategy exists ...’.

- ii. 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’

- iii. Under the NPPF, there is a clear presumption against loss and deterioration of Ancient Woodland where the ‘exceptional reasons’ test cannot be met.

2.2 Local Planning Policy

2.2.1 Three Rivers District Council: Local Plan 2011

- i. Policy CP9 Green Infrastructure of the Local Plan provides relevant policy direction with respect to Ancient Woodland, extracts are presented below:

‘The Council will seek a net gain in the quality and quantity of Green Infrastructure, through the protection and enhancement of assets and provision of new green spaces. Priorities for Green Infrastructure focus on conserving and enhancing the following key assets and the linkages between them which are:

‘... the District’s Sites of Special Scientific Interest, Local Nature Reserves, wildlife sites, key biodiversity habitats, species and areas identified in the Hertfordshire Biodiversity Action Plan and heritage assets and landscape character within areas of Green Infrastructure’.

2.2.2 Three Rivers District Council: Development Management Policies 2013

- ii. DM6: Biodiversity, Trees, Woodland and Landscaping provides relevant policy direction with respect to Ancient Woodland, relevant extracts are presented below:

‘Planning permission will be refused for any development resulting in the loss or deterioration to protected woodland (including ancient woodland), protected trees (including aged or veteran trees) and hedgerows, unless conditions can be imposed to secure their protection ...’.

‘Development that would affect a Site of Special Scientific Interest, Local Nature Reserve, Local Wildlife Site or protected species under UK or European law, or identified as being in need of conservation by the UK Biodiversity Action Plan or the Hertfordshire Biodiversity Action Plan, will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site, unless it can be demonstrated that:

- The need for the development would outweigh the need to safeguard the biodiversity of the site, and where alternative wildlife habitat provision can be made in order to maintain local biodiversity; and*
- Adverse effects can be satisfactorily minimised through mitigation and compensation measures to maintain the level of biodiversity in the area.*

The following areas have been highlighted as key areas for biodiversity within the Hertfordshire Biodiversity Action Plan:

- ... Whippendell Woods and surrounds ...*

In the first instance development should seek to avoid impacts on designated sites and important habitats/species through sensitive design and consideration of alternatives. Proposals should seek to incorporate measures for biodiversity enhancement and Green Infrastructure delivery wherever possible.

Development must conserve, enhance and, where appropriate, restore biodiversity through:

- Protecting habitats and species identified for retention*
- Providing compensation for the loss of any habitats*

- *Providing for the management of habitats and species*
- *Maintaining the integrity of important networks of natural habitats, and*
- *Enhancing existing habitats and networks of habitats and providing roosting, nesting and feeding opportunities for rare and protected species.*

Linked habitats are important in allowing species to adapt and respond to circumstances. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape.

2.3 Wildlife and Countryside Act 1981 (as amended)

- Under the Wildlife and Countryside Act 1981 (as amended), it is an offence to carry out or permit to be carried out any operations likely to damage the Site of Special Scientific Interest (SSSI). These operations are listed in the SSSI notification.
- Owners, occupiers, public bodies and statutory undertakers must give notice and obtain the appropriate consent under S.28 of the Wildlife and Countryside Act 1981 (as amended), before undertaking operations likely to damage a SSSI.

2.4 Natural Environment and Rural Communities Act 2006

- Section 40 of the Natural Environment & Rural Communities Act (NERC) 2006 sets out the duty for public bodies to conserve biodiversity in England. Habitats and species of principal importance for the conservation of biodiversity are identified by the Secretary of State, in consultation with Natural England, and are referred to in Section 41 of the NERC Act.
- The 'Section 41 List', which includes Ancient Woodland (lowland mixed deciduous woodland in the context of the Site), is used as a guide for decision makers within public bodies, such as local planning authorities, to implement their duty under Section 40 of the NERC Act and thereby have regard to the conservation of biodiversity in England when carrying out their normal functions. The habitats and species on the Section 41 List, are material considerations for planning decisions within England.

2.5 The Environment Act 2021

- An amendment to the NERC Act Section 40 duty, provided for in the Environment Act 2021, extends the biodiversity duty on public bodies to include the 'enhancement' of biodiversity alongside conservation by way of creating the 'general biodiversity objective'.
- Local Nature Recovery Strategies (LNRSs) are a new England-wide system of spatial strategies established by the Environment Act 2021. The main purposes of these strategies are to help reverse the ongoing decline of nature in England by establishing priorities for nature recovery. The DRAFT Hertfordshire LNRS identifies the Ancient Woodlands within and surrounding the Site as 'Areas of Particular Importance for Biodiversity' (APIBs), identified as statutory designed sites and irreplaceable habitats in Hertfordshire. The DRAFT Hertfordshire LNRS Strategy Document identifies Whippendell Woods SSSI as a 'key ancient woodland asset' in Hertfordshire.

2.6 Natural England and Forestry England Standing Advice 2022

- The GOV UK web based Standing Advice defines how to assess a planning application when there are Ancient Woodland, Ancient Trees or Veteran Trees on or near a proposed development site and further provides broad guidelines for the avoidance of impacts, reduction (mitigation) of impacts and the compensation of impacts as a last report.
- The Standing Advice identifies direct and indirect pathways which can lead to the deterioration of Ancient Woodland but does not specifically define the term 'deterioration' in accordance with its context in the NPPF.

3 ANCIENT WOODLAND BASELINE AND IMPACT ASSESSMENT

3.1 Site Scoping Survey

- i. A site scoping survey was undertaken on the 4th of June 2025 by Steven Weber BSc (Hons) MCIEEM. The scope of the site scoping survey focussed on (Figure 1):
 - Green Lane Wood, located within the Site.
 - The boundaries of the Site, where adjacent to the offsite Ancient Woodlands.
 - Long Newlands Spring Wood.
 - Dell Wood.
- ii. The scope of the site survey was considered sufficient to capture the key Ancient Woodland assets onsite and the offsite Ancient Woodlands proximal to the residential development parcels of the Scheme, principally Long Newlands Spring Wood and Dell Wood. The Woodland Trust also stated in their consultation response (Appendix 4) that Dell Wood under their ownership was of particular concern, and that in respect of Merlin's / Newlands Spring Wood *'we have similar concerns ... although to a lesser extent as this woodland would be adjacent to the new Country Park and further from built up areas (sic)'*.
- iii. The purpose of the site scoping visit was to:
 - Determine the extent and magnitude of existing recreational and urban pressures on the surrounding Ancient Woodland.
 - Identify existing assets to mitigate recreational and urban pressures, such as (but not limited to) fencing and other access deterrents, pedestrian access controls (i.e. kissing gates, stiles, squeeze posts), dog / litter bins, habitat creation / remediation and visitor interpretation (waymarking, signposts, feature boards).
 - Broadly characterise the ecological distinctiveness and condition of the Ancient Woodland and habitats present therein.

3.2 Baseline Results

- i. Tables 3-5 describe the baseline results for each Ancient Woodland comprising data from designated site citations and the site scoping survey undertaken in June 2025. Where a site survey was not undertaken for an Ancient Woodland within the defined ZOI of this Management Plan, the designated site citations are described (Table 6).
- ii. With respect to observations of existing recreational and urban pressures and mitigation assets, this is summarised in Tables 3-5 and examined in detail throughout the outline mitigation solution section of this Management Plan (Section 4).

Table 3 Green Lane Wood LWS – Baseline Summary

GREEN LANE WOOD LWS
LWS Citation: Ancient semi-natural broadleaved woodland, mainly of oak (both pedunculate oak and sessile oak) with some ash, silver birch, field maple and hazel coppice. Wildlife Site criteria: Ancient Woodland Inventory site; woodland indicators.

GREEN LANE WOOD LWS
Habitat Baseline (June 2025): Minor stand of high-canopy woodland within the middle of an arable field, in the Site boundary. Scrub layer is frequent and dense throughout, with a dense and mostly continuous woodland edge. It is difficult to walk through woodland due to density of scrub, but locally abundant patches of ancient woodland indicators dog's mercury and English bluebells evident are throughout, as well as common nettle, bramble and garlic mustard. Canopy: Abundant oak (many mature), with frequent cherry and elm, occasional sycamore. Shrubs: Abundant to locally dominant hazel and holly, frequent elder. Ground Layer: Locally abundant dog's mercury, common nettle, garlic mustard, bluebells, and bramble.
Summary of Recreational / Urban Edges Pressures (June 2025): A children's 'den' is evident in narrow finger of woodland to the south, with evidence of trampling, litter and vandalism of trees, but the damage is localised. The density of scrub within the woodland significantly hinders further ingress into woodland from the den area. No fencing present around woodland perimeter.

Table 4 Long Newlands Spring Wood LWS – Baseline Summary

LONG NEWLANDS SPRING WOOD LWS
LWS Citation: See Dell Wood.
Habitat Baseline (June 2025): A narrow and linear finger of high-canopy woodland, with a consistent shrub layer and occasional to frequent open patches. There is no obvious evidence of ancient woodland indicators (possibly due to the trampling and ground disturbance), ivy and bramble are dominant with frequent patches of bare ground. Canopy: Abundant ash and sycamore, occasional cherry and oak. Shrubs: Abundant holly, hazel and elm, occasional hawthorn and blackthorn. Ground Layer: Abundant to dominant ivy and bramble, locally frequent cow parsley and occasional garlic mustard. Bare ground is frequent to locally dominant.
Summary of Recreational / Urban Edges Pressures (June 2025): A public right of way runs through middle of woodland; the patches of bare ground appear to be a result of trampling. There are frequent desire lines. There is occasional evidence of potential vandalism of trees causing die back, although this contributes to a limited deadwood resource with the woodland. Limited fencing present around woodland perimeter.

Table 5 Dell Wood LWS – Baseline Summary

Dell Wood LWS
LWS Citation: A complex of ancient semi-natural woodlands. Dell Wood and Long Newland's Spring Wood are similar in character with old hazel coppice throughout, abundant silver birch and a scattering of other trees including pedunculate oak, ash, beech, wild cherry and field maple. The ground flora is dominated by bluebell with some bracken and bramble plus woodland indicators such as wood sedge, broad buckler-fern, primrose, three-nerved sandwort and common dog-violet. Long Newlands Spring Wood in the south is mainly sycamore with wild cherry plus holly and hawthorn below. The ground flora is quite diverse but supports fewer woodland indicators compared to the rest of the complex. A pit and clearings add habitat diversity to the site. Wildlife Site criteria: Ancient Woodland Inventory site; woodland indicators.
Habitat Baseline (June 2025): High-canopy woodland with consistent shrub layer throughout. Locally dominant patches of ancient woodland indicator species English bluebells are present, particularly where tree / shrub layer is more closed. Locally dominant patches of bramble and bracken become evident where the tree / shrub layer is more open. Canopy: Abundant oak, frequent ash, occasional to frequent cherry, occasional silver birch, beech and field maple. Numerous mature oak and cherry trees are present.

Dell Wood LWS
Shrubs: Frequent hazel, holly hawthorn and elm.
Ground Layer: Locally dominant English bluebells, locally frequent dog's mercury, locally dominant bracken, bramble and ivy, frequent wood avens and occasional male fern.
Recreational / Urban Edges Pressures (June 2025): A large depression (dell) is present to the south of the woodland and appears to be a 'destination' area for recreational and urban edge pressures, as extensive ground disturbance is evident with some vandalism of trees and litter. There is evidence of some footfall disturbance along the main footpath to the dell, although beyond the dell this is limited. Whilst recreational and urban edge pressure is evident in Dell Wood, it appears to be localised. No fencing present around woodland perimeter.

Table 6 Other Ancient Woodlands – Designated Site Citation Summaries

Other Ancient Woodlands - Designated Site Citation Summaries
Merlin's Wood and Newlands Spring Wood LWS: Part ancient semi-natural (Merlin's Wood) and mostly old secondary woodland (Newlands Spring). Merlin's Wood supports standards of pedunculate oak and silver birch with some hornbeam coppice, mainly in the south-west. Some broadleaved planting is present. The ground flora is diverse and consists largely of bracken, bramble, ferns and bluebell but with many other species recorded including hairy wood-rush, wood melick, wood millet, wood sorrel, wood meadow-grass and wood sedge. Part of Newlands Spring is secondary woodland with pedunculate oak, pendulous birch and hazel. Wildlife Site criteria: Ancient Woodland Inventory site and old secondary woodland with a semi-natural canopy and varied structure; woodland indicators.
Harrocks Wood LWS: Ancient semi-natural broadleaved woodland supporting two stand types - beech with hazel coppice and silver birch with hazel and a few pedunculate oak. There are also areas dominated by sycamore and ash along with some conifer planting. The ground flora is diverse and supports numerous woodland indicators including bluebell, wood sorrel, woodruff, wood millet, hairy wood-rush, yellow pimpernel, primrose and broad buckler-fern. The uncommon species coralroot is locally abundant. Nationally rare and notable invertebrates have been recorded from the site. Wildlife Site criteria: Ancient Woodland Inventory site; woodland indicators.
Whippendell Wood SSSI: This is an ancient woodland site in the clay-with-flints region which retains large areas of semi-natural vegetation. A complex of woodland habitats is present on the pebble clays and sandy soils with oak/hazel/ash and oak/hornbeam being the major stand types. Both these woodland types have been much reduced in extent nationally and the former is also scarce in Hertfordshire. This is a large woodland in a predominantly urban and agricultural setting. Pedunculate oak/ash high forest is an important element with a relatively open canopy and some trees reaching a height of thirty metres. Coppice-with-standards structure also exists where old hazel coppice dominates the shrub layer and with hornbeam present elsewhere. Other scrub species include holly, hawthorn, dogwood and wild cherry with occasional spindle. The ground flora is typical of such conditions and is dominated by Yorkshire fog, bluebell, honeysuckle and bracken. Frequent under the hazel coppice are primrose and wood spurge. Recent felling in a small broad-leaved and mixed plantation has promoted such species as dog's mercury, sanicle, male-fern as and broad buckler fern. A woodland ride and adjoining patch of neutral grassland with scattered silver birch adds to flora diversity with sweet vernal-grass and agrimony frequent, and twayblade occasional. Sympathetic management has retained considerable amounts of dead wood encouraging a rich variety of fungi, for which the site is well known, and a well-developed invertebrate fauna. Several local insect species occur, with the moth lead-coloured drab being especially notable. Hawfinch and wood warbler are indicative of the diverse breeding bird community.

3.3 Recreational and Urban Edge Pressures – Impact Assessment

3.3.1 Impact Identification and Characterisation

- i. The RS 2025 EclA, submitted to inform the Scheme's outline planning application provides 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. It is therefore not the intention of this Management Plan to repeat the detail of these published impact assessments.
- ii. The impacts and effects of potential recreational and urban pressures arising from the Scheme are identified and characterised in summary form below, with reference to the consultee comments (Appendix 3):

- Trampling of vegetation from increased visitor footfall, reducing the extent of woodland vegetation (particularly delicate ancient woodland indicator plants), and increasing areas of bare ground thereby exacerbating woodland soil erosion;
 - Increases in localised degradation of woodland vegetation (particularly delicate ancient woodland indicator plants) from dog faeces and urine;
 - Potential use of off-road motorbikes and mountain bikes on non-permissive routes, increasing bare ground, widening existing footpaths and creating localised rutting of woodland soils;
 - Compaction of tree roots from increases in recreational pressure, with negative effects on the physiological health of woodland trees and shrubs (such as crown die-back);
 - Increases in anti-social behaviour activities within woodland areas, such as damage to trees and shrubs because of vandalism and fire damage to delicate ancient woodland plants because of arson or campfires / BBQ's;
 - Disturbance and displacement of woodland faunal species from increases in visitor footfall, dog walking, and anti-social behaviour, particularly nesting birds and ground dwelling mammals;
 - Predation of woodland faunal species from increases in domestic animals;
 - Increases in the potential for fly-tipping events, including garden waste, with the potential for the release of toxins and non-native and invasive plant species into the Ancient Woodland environments; and
 - Overzealous pruning or felling of woodland trees and shrubs due to safety concerns.
- iii. The impact assessment as defined within the RS 2025 EclA and the summarised list described above, has been used to inform the outline design of mitigation proposals and options as described in the next section of this Management Plan (Section 4).

3.3.2 Consideration of Built-In Mitigation

- iv. The RS 2025 EclA defines mitigation built into the Illustrative Masterplan (Appendix 1) and Landscaping Strategy of the Scheme (Appendix 2), to reduce impacts to the surrounding Ancient Woodland. In respect of potential recreational and urban edge pressures on the Ancient Woodlands, the mitigation measures comprised:
- In accordance with Natural England and Forestry England Standing Advice (2022), a minimum 15m development buffer incorporated around all surrounding Ancient Woodlands with an additional 15m green buffer (30m buffer total) around Green Lane Wood, located within the Site boundary.
 - Belts of native shrub planting around the boundaries of the Ancient Woodland facing the Scheme, to deter undesirable pedestrian access into the woodlands.
 - The creation of an extensive Country Park to the north of the Site, as well as other areas of Public Open Space, Neighbourhood Equipped Areas for Play, Local Equipment Areas for Play and wetlands across the Scheme, to divert recreational and urban pressures away from the surrounding Ancient Woodlands.
- v. In consideration of the built-in mitigation, the impacts and effects of recreational and urban pressures arising from the Scheme are likely to be focused on the following three woodlands proximal to the proposed residential development parcels, which form the focus of outline design of mitigation proposals and options as described in the next section of this Management Plan (Section 4):
- Green Lane Wood (located within the Site).

- Long Newlands Spring Wood (located directly west of the Site and residential development parcels).
 - Dell Wood (located directly west / northwest of the Site and residential development parcels).
- vi. The impacts and effects of recreational and urban pressures arising from the Scheme are likely to be less acute on the distal Ancient Woodlands from the development parcels and where also adjacent to or beyond the proposed Country Park, specifically Merlin's / Newlands Spring Wood, Harrocks Wood and Whippendell Wood. The Woodland Trust also stated in their consultation response (Appendix 4) that Dell Wood under their ownership was of particular concern, and that in respect of Merlin's / Newlands Spring Wood *'we have similar concerns ... although to a lesser extent as this woodland would be adjacent to the new Country Park and further from built up areas (sic)'*.

4 OUTLINE MITIGATION PROPOSALS (ONSITE) & MITIGATION OPTIONS (OFFSITE)

4.1 Outline Mitigation Proposals (Onsite)

- i. Table 7 defines outline proposals within the Site to improve, renew and create physical mitigation assets.
- ii. Table 8 defines additional outline proposals to permit the detailed design of the physical mitigation assets, secure delivery and maintain and service long-term.
- iii. The outline mitigation proposals are illustrated in Figure 2 (Mitigation Proposals Plan).
- iv. Onsite mitigation measures can be directly controlled, funded and managed long-term by the Planning Applicant (and/or Management Company funded through resident service charges) and secured by TRDC (the Planning Authority) through standard planning obligations.
- v. The onsite outline mitigation proposals have to date been captured within the Ecological Impact Assessment report produced by RammSanderson (RSE_8238_R1_V4) in support of outline planning and have thus been expanded upon in this Management Plan, to provide a framework for detailed design. It is the intention that the onsite outline mitigation proposals would be secured by planning condition and commuted sums pursuant to a Reserved Matter application, with their detailed design, management and monitoring captured through the submission of a Detailed Woodland Recreational Management Plan with supporting detailed landscape plans and specifications.

4.2 Outline Mitigation Options (Offsite)

- i. Table 9 defines outline options within Long Newlands Spring Wood and Dell Wood (owned by the Woodland Trust) for the improvement, renewal or creation of physical mitigation assets.
- ii. Table 10 defines additional outline options to allow the delivery of those mitigation assets, maintain and service long-term and further define other service-based outline mitigation options to control recreational and urban edge pressures on offsite Ancient Woodlands.
- iii. The outline mitigation options are illustrated in Figure 2 (Mitigation Proposals Plan).
- iv. It is not the intention of this Management Plan to dictate to the Woodland Trust how their woodlands should be managed but rather provide a framework through which the offsite outline mitigation options, informed through a RammSanderson scoping site visit, can be developed through further dialogue with the Trust. It is intended that the scope and detail of the offsite outline mitigation options would be agreed as part of a grant of Reserved Matters planning consent and further secured and funded through an appropriate legal agreement, further to ongoing dialogue and consultation with the Planning Applicant, the Trust and the various stakeholders in the process.

Table 7 Onsite Outline Proposals to Mitigate Recreational and Urban Edge Pressures

Ref.	Application Site Location	Current Issues	Photograph(s)	Onsite Outline Mitigation Proposals	Method for Securing
AS1 Fig. 2	Application Site – PRow pedestrian entrance from Rousebarn Lane.	PRow pedestrian entrance on the northeastern boundary of the Application Site from Rousebarn Lane. The PRow links east-west through to the Dell Wood PRow pedestrian entrance. The current PRow pedestrian access asset off Rousebarn Lane comprises a narrow timber swing gate with dense vegetation either side. Deterrence of bicycle access would not be appropriate in this location, as the proposed Scheme will link to Rousebarn Lane, with a requirement for the facilitation of active travel and leisure pursuits. No dog/litter bins are currently present at this location. Visitor interpretation is limited.		- Upgrade existing access asset to allow ingress / egress by bicycles onto Rousebarn Lane and prevent access by off-road motorbikes - Install 1 Nos dog bin / litter bin to deter instances of dog fouling and littering (subject to Local Authority adoption for waste collection / maintenance). - Avoid at this location additional visitor interpretation (interpretation panels / pictorial boards) of the surrounding Woodland Trust (WT) woodland network, to reduce the potential for a wider catchment of pedestrian footfall and thereby recreational pressures.	- Detailed Hard Landscaping and Access Strategy Specification - Detailed Landscape Masterplan - Detailed Woodland Recreational Management Plan Secured by planning condition, pursuant to a Reserved Matters application. Commuted sum agreed with Local Authority for dog bin / litter bin, prior to determination of Reserved Matters planning.
AS2a AS2b Fig. 2	Application Site – perimeter boundaries to surrounding woodlands.	No or very limited fencing is present around the wooded perimeter boundaries of the Application Site to Dell Wood, Newlands / Merlin's Spring Wood and Whippendell Wood. Woodland boundaries are scrubby and impenetrable, but only in places. The current lack of access deterrents around the woodland perimeters will significantly increase the potential for undesirable pedestrian ingress / egress into the surrounding woodlands from the proposed Scheme, and thereby exacerbating trampling of woodland vegetation, general disturbance pressures and anti-social / urban edge activities.		- Installation of ridged and continuous fencing (i.e. post and wire) along the perimeter boundaries of the proposed Scheme and Dell Wood, Newlands / Merlin's Spring Wood and Whippendell Wood (AS2a), to create a deterrent to undesirable pedestrian access into the surrounding woodlands. Perimeter fencing would channel pedestrian footfall into existing woodland PRow access / entrance points. Fencing shall follow the below design guide: - Sufficiently robust to deter pedestrian access into the woodlands and further allow ease of maintenance and repair, appropriate to the Scheme design and Site location (such as post and wire fencing). - Fencing materials to be sympathetic to the character of the Scheme and the surrounding Ancient Woodlands, such as the use of timber fence posts and green-hued high-tensile wires and mesh, ensuring low visual intrusion. - To strengthen access deterrent functionality along Dell Wood, Newlands / Merlin's Spring Wood and Whippendell Wood, planting of a ~ 5m to 15m wide continuous belt of native planting behind the perimeter fencing (AS2b), i.e. thorny shrubs. This mitigation measure will in addition, improve woodland edge structures and provide additional foraging and shelter resources for a variety of woodland and woodland edge faunal species and the below design guide shall be followed: - Planting shall comprise scalloped edges, bordered by tall sward grassland, to create a natural character to the woodland edge and further enhance the structural and species diversity of woodland edge and ecotone habitats. - Planting shall be located behind the perimeter fencing, to allow for maintenance of the fencing and protect the planting from damage and vandalism. - The planting list shall comprise native thorny shrubs to increase the access deterrent, but also other native shrubs typical of the local landscape. Final planting list to be approved by the Project Ecologist. - Locked access gates to be located within the perimeter fencing to allow maintenance and aftercare of planting, access gates shall have anti-climb features installed. Gate materials to be sympathetic to the character of the Scheme and the surrounding Ancient Woodland, to ensuring a low visual intrusion.	- Detailed Planting Specification - Detailed Boundary Treatment Specification - Detailed Landscape Masterplan - Detailed Woodland Recreational Management Plan Secured by planning condition, pursuant to a Reserved Matters application.
AS3 Fig. 2	Application Site – REF Illustrative Landscape Strategy (Iceni DL02 Rev B August 2024).	With reference to the submitted outline Illustrative Landscape Strategy, the proposed pedestrian footpath southwest of the Scheme proposes a direct access point into Long Newlands Spring Wood, proximal to the residential parcels (see adjacent snapped image, blue circle). There is no existing PRow access through the Application Site along the proposed pedestrian footpath into Long Newlands Spring Wood. The presence of the proposed pedestrian access point into Long Newlands Spring Wood will increase recreational, anti-social and urban edge pressures across the WT woodland network, particularly given the proximity to residential parcels.		- Remove from the Illustrative Landscape Strategy and any associated development drawings, the proposed pedestrian access point into Long Newlands Spring Wood (AS3) (see also adjacent snapped image, blue circle). - Install planting and fencing along the boundary to Long Newlands Spring Wood, as described for AS2a and AS2b.	Amend relevant plans prior to determination of Outline planning.

Ref.	Application Site Location	Current Issues	Photograph(s)	Onsite Outline Mitigation Proposals	Method for Securing
AS4 Fig. 2	Application Site – existing southern hedgerow boundaries along Little Green Lane.	The existing hedgerow boundaries between the Application Site and Little Green Lane are for the most part dense and continuous, providing an effective deterrent against undesirable pedestrian access. Occasional minor gaps are however present in the hedgerow boundary along Little Green Lane. The main entrance to Long Newlands Spring Wood is offsite located along Little Green Lane, off the southwestern corner of the Application Site (LNS1).		- Gap planting of hedgerow boundaries with native shrub species along Little Green Lane to strengthen access deterrent functionality. - The planting list shall comprise native thorny shrubs to increase the access deterrent, but also other native shrubs typical of the local hedgerow network. Final planting list to be approved by the Project Ecologist.	- Detailed Planting Specification - Detailed Boundary Treatment Specification - Detailed Landscape Masterplan - Detailed Woodland Recreational Management Plan Secured by planning condition, pursuant to a Reserved Matters application.
GL1a GL1b GL1c GL1d Fig. 2	Application Site - Green Lane Wood.	No fencing is present around the wooded perimeter boundary of the Application Site to Green Lane Wood. Most of the woodland boundary around Green Lane Wood is scrubby and impenetrable, however within the southern 'leg' of the woodland, where the woodland edge scrub is sparser, a children's 'den' present with litter and trampling is present (GL1a). The impacts are however currently highly localised, due to the scrubby and impenetrable nature of the wider woodland parcel. The current condition of access deterrents will exacerbate undesirable pedestrian ingress / egress into Green Lane Wood from the proposed Scheme particularly due to its proximity to residential parcels and public greenspaces, thereby exacerbating trampling of woodland vegetation, general disturbance pressures and anti-social / urban edge activities.	 	- Installation of ridged and continuous fencing (i.e. post and wire) along the perimeter boundaries of the proposed Scheme to Green Lane Wood (GL1b), to create a deterrent to undesirable pedestrian access. Fencing shall follow the below design guide: - Sufficiently robust to deter pedestrian access into the woodlands and further allow ease of maintenance and repair, appropriate to the Scheme design and Site location (such as post and wire fencing). - Fencing materials to be sympathetic to the character of the Scheme and the surrounding Ancient Woodlands, such as the use of timber fence posts and green-hued high-tensile wires and mesh, ensuring low visual intrusion. - To strengthen access deterrent functionality along Green Lane Wood, planting of a ~ 5m to 15m wide continuous belt of native planting behind the perimeter fencing (GL1c), i.e. thorny shrubs. This mitigation measure will in addition, improve woodland edge structures and provide additional foraging and shelter resources for a variety of woodland and woodland edge faunal species and the below design guide shall be followed: - Planting shall comprise scalloped edges, bordered by tall sward grassland, to create a natural character to the woodland edge and further enhance the structural and species diversity of woodland edge and ecotone habitats. - Planting shall be located behind the perimeter fencing, to allow for maintenance of the fencing and protect the planting from damage and vandalism. - The planting list shall comprise native thorny shrubs to increase the access deterrent, but also other native shrubs typical of the local landscape. Final planting list to be approved by the Project Ecologist. - Locked access gates to be located within the perimeter fencing to allow maintenance and aftercare of planting, access gates shall have anti-climb features installed. Gate materials to be sympathetic to the character of the Scheme and the surrounding Ancient Woodland, to ensuring a low visual intrusion. - Removal of the children's 'den' and associated waste (GL1a), with the remediation of trampled woodland areas, including native shrub planting and native woodland herbaceous seeding to be approved by the Project Ecologist. - Install 1 Nos interpretation board to educate residents / visitors, particularly the importance of ancient woodland and protection of sensitive woodland habitats. Define the important of dogs on leads / close control, as part of a 'Woodland Code' (GL1d – approximate location only).	- Detailed Planting Specification - Detailed Boundary Treatment Specification - Detailed Landscape Masterplan - Detailed Woodland Recreational Management Plan - Habitat Management and Monitoring Plan Secured by planning condition, pursuant to a Reserved Matters application.

Table 8 Additional Onsite Outline Proposals to Mitigate Recreational and Urban Edge Pressures

Additional Onsite Outline Mitigation Proposals	Description	Method for Securing	Priority
Habitat Management and Monitoring Plan. –Scheme-wide, inc. Green Lane Wood.	Long term habitat management, monitoring and remedial measures for the onsite Green Lane Wood. To secure positive management of ancient woodland habitats during operation of the proposed Scheme, and to trigger remediation of habitats resulting from residual recreational and urban edge pressures following subsequent monitoring. HMMP must specify how management and monitoring will be funded (predicted to be through service charges from residents).	Planning condition.	ESSENTIAL
Detailed Woodland Recreational Management Plan.	To specify in detail the agreed onsite mitigation proposals, for the purposes of construction and soft landscaping works, supported by detailed landscape plans and specifications. Identify how the mitigation features will be monitored, managed, maintained, renewed and thereby funded, to secure long-term mitigation functionality (predicted to be through service charges from residents). Define a strategic and holistic strategy to channel recreational and urban edge pressures away from surrounding woodlands, such as through defined walkways, waymarking and strategic tree and shrub planting (supported by a Detailed Landscape Masterplan).	Planning condition.	ESSENTIAL
Tree Safety Audits and Remedial Measures.	Incorporation of the onsite Green Lane Wood and onsite mature / veteran trees into the proposed Scheme's green space will increase the potential for risk to people and property because of tree failures. Cyclical tree safety audits will be required onsite as part of the landowners / Management Companies' legal duty of care. Prevention of tree risk failure and harm to people and property must be proactive not reactive and must avoid overzealous heavy pruning or felling of trees. Any Tree Safety Audits and Remedial Measures undertaken onsite must follow the principles set out in the National Tree Safety Group's Common sense risk management of trees: Second Edition, 2024 https://ntsgroup.org.uk/wp-content/uploads/2024/10/NTSG-full-guidance.pdf.	Legal duty of care.	ESSENTIAL

Table 9 Potential Offsite Outline Options to Mitigate Recreational and Urban Edge Pressures (Long Newlands Spring Wood and Dell Wood)

Ref.	Offsite Location	Current Issues	Photograph(s)	Potential Offsite Outline Mitigation Options
LONG NEWLANDS SPRING WOODLAND – LANDOWNER CURRENTLY UNKNOWN.				
LNS1 Fig. 2	Long Newlands Spring Wood – pedestrian entrance from Little Green Lane.	Pedestrian access point into Long Newlands Spring Wood PRoW and the wider Woodland Trust (WT) woodland network from Little Green Lane, which facilitates visitor access from existing residential areas and the proposed Scheme. A kissing gate is present at the entrance to Long Newlands Spring Wood; the asset is currently defunct due to missing fencing / vegetated access deterrents. The existing post and wire fencing is also currently defunct, along length of woodland edge to Little Green Lane. The current access asset at the Little Green Lane entrance to Long Newlands Spring Wood does not prevent ingress / egress from off-road motorbikes nor deter use by bicycles. Long-term, there is the potential for trampling of woodland vegetation proximal to the Little Green Lane entrance, as access assets will fail over time (such as the defunct post and wire fencing). No visitor information is currently present at this location, nor are any dog/litter bins.	 	<i>Would require liaison with Rights of Way Officers (TRDC) under Highways Act (1980) etc. and landowner (currently unknown) to deliver access asset upgrade on public right of way network.</i> ESSENTIAL - Upgrade access asset at the Little Green Lane entrance, i.e. upgrade kissing gate or install new access assets and renew fencing (Box 1) to deter access from off-road motorbikes / bicycles. - Install 1 Nos dog bin/litter bin to deter instances of dog fouling and littering (subject to Local Authority adoption for waste collection / maintenance). DESIREABLE - Install 1 Nos interpretation board to educate visitors, particularly the importance of ancient woodland and protection of sensitive woodland habitats. Define the importance of dogs on leads / close control, as part of a 'Woodland Code'. Box 1 –Fencing / Access Deterrent Design Guide Installation of fencing within Ancient Woodland must strike an appropriate balance between delivering the required mitigation solution and retaining the semi-natural character of the woodland, thereby avoiding undesirable visual intrusion and maintaining a positive visitor experience. The following overarching principles shall be adhered to during the detailed design and specification of fencing / access deterrents within Ancient Woodland: - Wherever possible, utilise low-level access deterrents such as knee rails or felled tree poles to channel pedestrian traffic away from sensitive habitats. - Use natural materials to create access deterrents where this will effectively deliver the mitigation solution, such as chestnut paling or dead hedging. - Where a more robust access deterrents is required, such as post and wire fencing, use timber fence posts and green-hued high-tensile wires and mesh, to provide low visual intrusion. - The planting of native shrubs behind fencing, particularly thorns, will strengthen access deterrent functionality and further add natural softening and blending qualities. Use of shrub planting must be assessed against the management aims and objectives for the woodland, and must not for example, be at the detriment to ancient woodland ground flora.
LNS2 Fig. 2	Long Newlands Spring Wood (length of).	There is currently extensive trampling of woodland margins by pedestrian traffic along the length of Long Newlands Spring Wood, due to the narrow and linear shape of the wood and presence of a PRoW. This has resulted in the deterioration of woodland vegetation and frequent patches of bare ground. Numerous desire lines are evident along the margins, leading out to non-woodland habitats. Felled tree poles have been lain along sections of the woodland margins, to ameliorate trampling damage.		<i>Would require liaison with landowner (currently unknown).</i> ESSENTIAL - Install fencing / low-visual impact access deterrents (Box 1) along affected trampled margins, targeted appropriately to maintain an effective balance between preserving PRoW access functionality and ameliorating trampling damage. DESIREABLE - Remediation of trampled margins, including native shrub planting and native woodland herbaceous seeding, designed and targeted to meet management aims and objectives for Long Newlands Spring Wood. Final planting list to be approved by the landowner / Project Ecologist.

Ref.	Offsite Location	Current Issues	Photograph(s)	Potential Offsite Outline Mitigation Options
				
LNS3a LNS3b Fig. 2	Long Newlands Spring Wood (length of).	Potential for access by motorbikes / bicycles along Long Newlands Spring Wood PRoW through other ingress / egress points, further providing access to the wider WT woodland network linked to the PRoW, specifically Dell Wood and Newlands / Merlin's Spring Wood. Potential for trampling of woodland vegetation and general disturbance pressures, including anti-social behaviour.	N/A	<i>Would require liaison with Rights of Way Officers (TRDC) under Highways Act (1980) etc. and landowner (currently unknown) to deliver access asset upgrade on public right of way network.</i> ESSENTIAL 6. Install 1 Nos kissing gate or 'squeeze post' with fencing (Box 1) to deter access from motorbikes / bicycles at the northern PRoW entrance to Long Newlands Spring Wood (LNS3a). DESIREABLE 7. Install one or more 'squeeze posts' with fencing (Box 1) along the Newlands Spring Wood PRoW to further deter access from motorbikes / bicycles; a balance will be required between a deterrence solution and retaining the semi-natural character of woodland location (LNS3b). Strategic installation of 'squeeze posts' will be required maximise deterrent functionality whilst maintaining pedestrian access.
DELL WOOD – WOODLAND TRUST OWNED SITE				
LNS4 Fig. 2	Long Newlands Spring Wood, adjacent to Dell Wood western boundary.	Existing fencing between Long Newlands Spring Wood and Dell Wood is broadly intact, however additional visitor pressures resulting from the proposed Scheme has the potential to further degrade access deterrent functionality. The useful lifespan of the existing fencing is unknown. A loss of access deterrent functionality will increase the potential for desire lines to be created through Dell Wood and thereby exacerbate trampling of woodland vegetation and general disturbance pressures, as well as anti-social behaviour and urban edge activities.		DESIREABLE 8. Survey of fencing between Long Newlands Spring Wood and Dell Wood to determine its useful lifespan, implement repairs and/or renewal depending on survey outcomes (Box 1).
DW1 Fig. 2	Pedestrian entrance to Dell Wood, from Long Newlands Spring Wood.	Current access asset at the entrance to Dell Wood from Long Newlands Spring Wood PRoW does not prevent ingress / egress from off-road motorbikes nor deter use by bicycles. Potential for trampling of woodland vegetation and general disturbance pressures, including anti-social behaviour and urban edge activities. Limited visitor information is currently present at this location. No dog / litter bins are present.		ESSENTIAL 9. Install 1 Nos kissing gate or 'squeeze post' with fencing (Box 1) to deter access from off-road motorbikes / bicycles at the entrance to Dell Wood. Access treatment could be repeated at other pedestrian entrances to Dell Wood from Long Newlands Spring Wood PRoW, subject to survey and assessment. DESIREABLE 10. Install 1 Nos WT interpretation board to educate visitors, particularly the importance of ancient woodland and protection of sensitive woodland habitats. Define the importance of dogs on leads / close control, as part of a 'Woodland Code'. 11. Consider installing 1 Nos dog bin/litter bin to deter instances of dog fouling and littering (subject to liaison with Planning Authority required to determine whether waste collection is feasible, given location and distance from vehicular access).

Ref.	Offsite Location	Current Issues	Photograph(s)	Potential Offsite Outline Mitigation Options
DW2 Fig. 2	Pit/dell within Dell Wood.	Large pit within Dell Wood, which is currently impacted by significant trampling, resulting in extensive areas of bare ground. This feature appears to be a 'destination point' for urban edge pressures such as fires, barbecues and vandalism of trees, and is likely to attract anti-social behaviour due to the large pit earthwork feature, of particular interest for youths. The earthwork banks appear to be utilised for mountain/jump bikes, due to presence of tyre tracks. The pit appears to be the epicentre of urban edge pressures and anti-social behaviour within Dell Wood, with limited evidence of impacts of this magnitude within other areas of Dell Wood.		DESIREABLE 12. Installation of fencing (Box 1) around the full perimeter of the pit banks, with strategic native planting behind (i.e. thorny shrubs), may serve to deter urban edge / anti-social activity in this location, in combination with the on and off-site package of mitigation proposals / options described in this Management Plan. There is a higher potential for access deterrents to be damaged through vandalism in this location, and will therefore require regular checking, maintenance and renewal. 13. Alternatively, the pit could be retained as a 'sacrificial area' to deter urban edge / anti-social activities within other areas of Dell Wood, given that the pit earthwork offers a 'destination' point, particularly for youths. The other access deterrents proposed within this Management Plan would aid in reducing further impacts to the 'sacrificial area'.
DW3 Fig. 2	Desire lines within Dell Wood.	Numerous badger / mammal trails are evident throughout Dell Wood, occasional pedestrian desire lines are present through the woodland vegetation, off the main walked footpaths. Existing and new desire lines have the potential to exacerbate trampling of woodland vegetation and general disturbance, particularly with increases in visitor pressure.		DESIREABLE 14. Fencing (Box 1) of desire lines with native planting behind (i.e. thorny shrubs), sufficient to deter access. A balance will be required between a deterrence solution and retaining the semi-natural character of woodland location.

Ref.	Offsite Location	Current Issues	Photograph(s)	Potential Offsite Outline Mitigation Options
DW4 Fig. 2	Dell Wood – eastern pedestrian entrance from PRoW through Application Site.	Pedestrian access point into Dell Wood from the PRoW through the Application Site. This location would be a principal pathway for recreational and urban edge pressures from the proposed Scheme. The access point provides PRoW access to the wider woodland network, specifically Dell Wood, Newlands / Merlin's Spring Wood and Long Newlands Spring Wood. The current access asset is a narrow metal swing gate with dense vegetation either side, however the access asset does not prevent ingress / egress from off-road motorbikes nor deter use by bicycles. No visitor information is currently present at this location, nor are dog bins / litter bins.		ESSENTIAL 15. Install 1 Nos kissing gate or 'squeeze post' with fencing (Box 1) to deter access from off-road motorbikes / bicycles at the entrance to Dell Wood. Ownership of access asset to be determined. 16. Install 1 Nos dog bin / litter bin to deter instances or dog fouling and littering (subject to Local Authority adoption for waste collection / maintenance). 17. Install 1 Nos WT interpretation board to educate visitors, particularly the importance of ancient woodland and protection of sensitive woodland habitats. Define the important of dogs on leads / close control, as part of a 'Woodland Code'.
DW5 Fig. 2	Dell Woodland – along northern PRoW.	The northern PRoW along Dell Wood would be a principal pathway for recreational and urban edge pressures from the proposed Scheme. There is the potential for an increase in desire lines to be created through Dell Wood from the PRoW and thereby exacerbate trampling of woodland vegetation and general disturbance pressures, as well as anti-social behaviour and urban edge activities.	N/A	DESIREABLE 18. Fencing (Box 1) of woodland edge adjacent to northern PRoW, sufficient to deter access into Dell Wood. Measures to be informed by a survey of existing boundary treatments.
DW6 Fig. 2	Dell Woodland – secondary pedestrian entrance proximal to PRoW entrance.	Secondary access point into Dell Wood, 5m south of PRoW access point (DW5). The access point is not on a PRoW but appears to be a formalised entrance point, with WT badging. This access point provides an additional principal pathway for recreational and urban edge pressures from the proposed Scheme.		ESSENTIAL 19. Permanently remove the access point through fencing (Box 1) and native planting (i.e. thorny shrubs). 20. Install waymarking and/or fencing (Box 1) further within Dell Wood, to prevent pedestrians accessing a closed footpath.

Table 10 Additional Offsite Outline Options to Mitigate Recreational and Urban Edge Pressures

Additional Offsite Outline Mitigation Options	Description	Method for Securing	Priority
Future monitoring, management, maintenance and renewal of offsite mitigation assets, agreed as part of the grant of planning consent for the Scheme. Remediation of residual recreational and urban edge pressures to woodland habitats because of the proposed Scheme (including invasive and non-native species), following cyclical monitoring. Litter picking and waste disposal.	Additional funding by the Planning Applicant to secure the long-term functionality of offsite mitigation assets and monitor and remediate residual impacts to woodland habitats.	Financial payment by Planning Applicant, through legal agreement.	ESSENTIAL
Interactive Woodland Trust interpretation boards, using QR codes and a mobile application.	Development and operation of a mobile application allowing visitors to directly report residual recreational and urban edge impacts to the Woodland Trust, accessed through QR codes on interpretation boards.	Financial payment by Planning Applicant, through legal agreement.	DESIREABLE
Woodland Trust Information / educate packs to schools and residents. Woodland Trust talks within local schools. Woodland Trust guided walks around surrounding Ancient Woodland.	On importance of ancient woodland and protection of sensitive woodland habitats. Define the importance of dogs on leads / close control, as part of a 'Woodland Code'.	Financial payment by Planning Applicant, through legal agreement.	DESIREABLE
Support with Woodland Trust volunteer coordination.	Organisation and managing volunteers to undertake woodland habitat management and enhancement works.	Financial payment by Planning Applicant, through legal agreement.	DESIREABLE

5 RESPONSE TO CONSULTEE COMMENTS

- i. This Management Plan summaries and responds to the consultee comments from the Woodland Trust, Forest Commission and TRDC Principal Tree and Woodlands Officer (Appendix 4), with reference to the outline mitigation solutions presented.
- ii. See Table 11.

Table 11 RammSanderson Response to Consultee Comments

Consultee Comment	RammSanderson Response
WOODLAND TRUST (WT)	
<i>'As far as we are aware, the applicant has not approached the Woodland Trust to better understand or survey biodiversity within our woodland'.</i>	Only Harrocks Wood is identified on the WT website as being owned by the Trust, Dell Wood and Newlands Spring / Merlin's Wood does not appear to be identified on the WT website.
<i>'Dell Wood is already experiencing significant deterioration. The name "Dell Wood" is a reference to the large hollow within the woodland, which currently suffers from anti-social behaviour, fires and barbecues'.</i>	Anti-social and urban edge pressures to the dell were identified during our site scooping visit as described by the WT, however it was our observations that the ' <i>significant deterioration (sic)</i> ' of Dell Wood was largely confined to the dell.
<i>'The Woodland Trust is not in a position to agree to the principle of a development of this nature and scale at this location in the absence of a robust evidence-based assessment of the impact on Dell Wood and proposals for mitigation'.</i>	An impact assessment and outline mitigation solutions have now been provided in the form of this Management Plan, to provide a framework for further dialogue with the Trust. We would welcome a site visit with the Trust to discuss potential mitigation solutions in more detail and would value their input.
<i>'We have similar concerns with regards to Newland's Spring wood, although to a lesser extent as this woodland would be adjacent to the new Country Park and further from built up areas'.</i>	We have not considered mitigation solutions for Newland's Spring Wood for the reasons cited by the WT; however, this does not exclude further dialogue with the Trust in this direction.
<i>'The applicant is proposing 15 metres of undeveloped buffer, with a further 15 metre zone incorporating some development, such as pathways and allotments. However, there is no supporting assessment to demonstrate that these proposals will be adequate to prevent impacts on the woodland from the increase in recreational pressure associated with a housing development of this scale'.</i>	It was not the intention of the buffer zones to be the sole deterrent from recreational pressures. However, we would welcome more detailed commentary from the WT on how the buffer zones can be enhanced further, within the proportionate limits of the Scheme design.
<i>'It is stated in the Ecological Impact Assessment that the pressures on Dell Wood could be of a similar magnitude to the pressures on Green Lane Wood, and yet the circumstances are completely different'.</i>	Whilst it is considered that our assessment of the pressures between Dell Wood and Green Lane Wood has been taken somewhat out of context, the Trust's own insights on the pressures to Dell Wood are welcomed and therefore we have adopted a bespoke mitigation solution approach for Dell Wood within this Management Plan.
<i>'It is not clear why Green Lane Wood would be provided with an un-encroached 30 metre buffer, whereas Dell Wood would be provided with a 15 metre un-encroached buffer'.</i>	The proposed Scheme will draw heavily upon the existing landscape and natural features of the village and Ancient Woodland setting to inform the subsequent design proposals. As mentioned above, we would welcome more detailed commentary from the WT on how the buffer zones can be enhanced further, within the proportionate limits of the Scheme design. It is unclear where the mention of differences between a 30-metre buffer and a 15-metre buffer has arisen from. It is our understanding upon the advice given by Tyler Grange, that both woodlands will receive a minimum of 30m development buffer zones will be implemented around all areas of Ancient Woodland which are within or adjacent to the Site. Whilst the Illustrative Masterplan is illustrative, this offset and 30-metre buffer for both Green Lane Wood and Dell Wood can be secured via the Land Use Parameters Plan (Ref. P24-1200_DE_0015 REV C - Appendix 3) submitted as part of the application, to be approved and conditioned as part of any grant of planning permission.

Consultee Comment	RammSanderson Response
<i>'To conclude, we have not been able to find any modelling to assess the level of intensification of access and use of the woodlands, and therefore it is not possible to fully understand the pressures on the various areas of ancient woodland, including Woodland Trust sites, from the increase in people, dogs and cats associated with a development of 600 houses. It does not appear that the scale of recreational pressure resulting from the housing mix has been properly considered through evidence-based analysis'.</i>	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. Furthermore, we believe that the additional time and cost spent on modelling visitor data would be better spent on stakeholder consultation and site visits, to determine factual evidence of recreational and urban edge pressures on the ground and further determine mutual solutions to mitigate those impacts.
<i>'Protection for ancient woodland is outlined within National Planning Policy Framework (NPPF) at paragraph 193(c). This policy provides a test for developments and impact on ancient woodland. However, the test for impact is not a test of significance or magnitude, it is a test of whether there would be any negative impact'.</i>	<i>'The test for impact (sic)' as defined within the National Planning Policy Framework (NPPF) at paragraph 193(c) is 'loss or deterioration of irreplaceable habitats' and not 'any negative impact (sic)'. Deterioration is not clearly defined as a term within the NPPF or current Natural England or Forestry England Standing Advice.</i>
<i>'Feasibility of adequate mitigation needs to be demonstrated by the applicant before this outline application can be approved'.</i>	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.
TRDC PRINCIPAL TREES AND WOODLAND OFFICER (TRDC Officer)	
<i>'The potential for indirect impacts on trees and woodlands, and the deterioration of irreplaceable habitats over the longer term, are significant. The proposal to site up to 600 new dwellings within 30 metres (at the closest points) to ancient woodland and notable / veteran trees would result in a significant increase in the residential population close to these irreplaceable habitats. This increase in population would inevitably lead to additional recreational pressures on the trees and woodland, such as the compaction of soils around important trees; the trampling of ground flora in woodland areas; erosion and widening of footpaths through woodland areas; and the disturbance of wildlife, through activities such as dog walking'.</i> <i>'There will also be additional anti-social behaviour issues relating to an increased population. This may include vandalism; arson; off-road motorcycling and mountain biking; and fly-tipping, which would all contribute towards the deterioration of this irreplaceable habitat'.</i> <i>'To prevent any long-term deterioration of these irreplaceable habitats would require a suitable compensation and mitigation strategy'.</i>	The potential impacts identified by the TRDC Officer has been recognised within this Management Plan and used as part of a wider baseline to design outline mitigation solutions for recreational and anti-social behaviour pressures, as further defined within this Management Plan. The design of the outline mitigation solutions has also been based on our site scoping visit, to provide a robust framework for further dialogue with TRDC, the Woodland Trust and other relevant stakeholders.
<i>'managing visitor access and pressure to the surrounding woodland and being able to deal with antisocial behaviour issues will be key to preventing the deterioration of the trees and woodlands. To successfully manage the open space, and visitor access and recreation, would require some form of ranger team or on-site maintenance staff to be able to respond to issues'.</i>	Various mitigation proposals and options have been defined within this Management Plan to manage longer-term residual recreational and urban edge pressures to the surrounding Ancient Woodlands, with the intention of being funded by the Planning Applicant and further agreed and developed through dialogue with TRDC, the Woodland Trust and other relevant stakeholders.

Consultee Comment	RammSanderson Response
effectively and quickly. This ongoing management and maintenance would need to be adequately funded and resourced to ensure the irreplaceable habitats are protected over the long term.	
'Placing development close to notable and veteran trees and incorporating them into more formal green spaces will also increase the level of risk should a tree fail. This could be detrimental to these ecologically important trees if overzealous safety works to fell or heavily prune them is undertaken to address perceived safety concerns'.	This potential impact is acknowledged within this Management Plan with a recommendation for Tree Safety Audits and Remedial Measures undertaken onsite to follow the principles set out in the 'National Tree Safety Group's Common sense risk management of trees' guidance.
FORESTRY ENGLAND (FE)	
'Whilst we note plans for a 30m buffer for the ancient woodlands, and plans for thorny shrub planting in the buffer zone, the application may still have the potential to cause deterioration to the ancient woodland. Although the buffer may be sufficient to avoid direct soil compaction during construction, indirect soil damage and disturbance would still be expected due to the extent of the proposed development. Impacts from machinery, movement of the workforce and from new residents would be expected to cause a deterioration'. (17/02/2025)	The RS 2025 EclA provides various recommendations for the protection of Ancient Woodlands within the prescribed buffer zones and requires mitigation measures to be secured through a Construction Ecological Management Plan (CEMP) and planning condition. It was not the intention of the buffer zones to be the sole deterrent for recreational and urban edge pressures. Outline solutions to mitigate such pressures 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 FE and other relevant stakeholders.
'The minimum suggested buffer mentioned in the Natural England/Forestry Commission Standing advice is more suited to a single dwelling, rather than a large development of up to 600 dwellings'. (10/06/2025)	The Standing Advice does not state that the required 15m buffer zone 'is more suited to a single dwelling (sic)' and it is our opinion that the Standing Advice cannot be interpreted, in any way, to mean this. Whilst the Standing Advice does provide broad advice on when the 15m buffer zone may need to be extended, this is not clearly defined. It is our opinion that alongside the mitigation solutions presented within this Management Plan, the width of the proposed buffer zones as presented in the submitted Masterplan (Appendix 1) are sufficient to meet the requirements of the Standing Advice. https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions
'... we have rather more concerns regarding the potential increase in recreational pressures on the ancient woodlands within and adjacent to the site ... With the associated direct and indirect impacts of both development, traffic, people and domestic pets'. (10/06/2025)	Various mitigation proposals and options have been defined within this Management Plan to manage longer-term residual recreational and urban edge pressures to the surrounding Ancient Woodlands, with the intention of being funded by the Planning Applicant and further agreed and developed through dialogue with FE, the Woodland Trust and other relevant stakeholders.
'We would encourage considering a mix of habitat types to create a graded edge from the existing woodland including new woodland, scrub and species rich grassland with effective management that maximises biodiversity value'. (17/02/2025)	It our opinion that these enhancements have already been captured in the submitted Illustrative Landscape Strategy (Appendix 2).

Consultee Comment	RammSanderson Response
<i>'We also note the inclusion of amenity public open space and footpaths within the Ancient woodland buffer, these may be better located outside of the buffer, with the buffer itself managed as a semi natural habitat less attractive to be used as public open space'.</i> <i>(17/02/2025)</i>	It is our opinion that, based on the submitted Illustrative Landscape Strategy (Appendix 2), there is minimum/or no inclusion of footpaths within the Ancient Woodland buffers. Notwithstanding, the Forestry Commission's view that amenity public open space would be better located outside of the buffer can and would be secured via the Land Use Parameters Plan (Ref. P24-1200_DE_0015 REV C – Appendix 3) submitted as part of the application, to be approved and conditioned as part of any grant of planning permission. The Land Use Parameters Plan sets out the Land Use Budget across the Site in terms of Public Open Space, but how this comes to fruition, in terms of typology, can differ and offers flexibility for any future Reserved Matters application. The Illustrative Masterplan shows one way the scheme could come forward. It is understood the Forestry Commission would be consulted upon any future detailed Reserved Matters application.
<i>'The proposed development will not improve habitat connectivity between Dell Wood, Long Newland's Spring and Green Lane Wood. In fact, it could sever it completely. With Green Lane Wood becoming completely isolated in its landscape. While managed grassland and play areas are to be provided, there is a greater opportunity to provide habitat connectivity between Green Lane Wood and Dell Wood in particular.</i> <i>With current plans, there would be very limited movement of species (flora and fauna) between habitat areas and therefore the species quality and diversity in the smaller, isolated woodland would likely decline and would be unlikely to improve (especially without appropriate management) and would further impact the woodland's resilience to future threats including climate change. The measures taken by the application to offset the proposal do not appear to take account for habitat connectivity or continuity.</i> <i>Whilst we understand that all trees and woodlands on site will be retained, there is an opportunity for increased woodland planting between the two woodlands to improve connectivity across the whole landscape.</i> <i>Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole site'.</i> <i>(17/02/2025)</i>	Whilst we acknowledge the FE's concerns around habitat fragmentation for Green Lane Wood, it should be noted that the wood is currently surrounded by managed arable cropland of low biodiversity value for woodland species and current green corridor connections to surrounding woodlands such as through the southernmost hedgerow are weak. Therefore, we do not agree in respect of habitat connectivity that the proposed development would result in Green Lane Wood becoming '<i>completely isolated in its landscape (sic)</i>'. Furthermore, as demonstrated within the submitted Illustrative Landscape Strategy (Appendix 2) and the RS 2015 EclA, the conversion of arable cropland to species-rich grassland and scattered trees between Green Lane Wood and the surrounding woodlands would be a significant biodiversity enhancement. However, the opportunities identified by FE to increase connectivity between Green Lane Wood and surrounding woodlands such as additional hedgerows and woodlands are welcomed and will be explored by the Applicant during the detailed design of the Scheme which can be further commented on by FE at the Reserved Matters stage.
CHILTERN CONSERVATION BOARD (CCB)	
<i>'The statutory boundary of the Chilterns AONB/National Landscape is set away from the application site and lies some 2.4 to 2.6km to the west of the submitted red line. The landscape within and surrounding the application site shares several characteristics with the Chilterns landscape, notably narrow and partly sunken lanes, dry chalk valley features, and a chalk plateau landscape. The River Gade, a Chilterns Chalk stream and valley landscape, is located</i>	Whilst not specifically related to Ancient Woodland, we recognise the CCB's concerns about the potential for recreational impacts to the River Gade because of recreational pressures. Whilst we have not proposed mitigation solutions along the PROWs between the Site and Cassiobury Park (where public access to the River Gade would be more likely) because there is no Ancient Woodland in this specific direction, this does not exclude further dialogue with the CCB in this direction.

Consultee Comment	RammSanderson Response
<i>approximately 2-3 km to the east of the application site. This flows from within a source within the National Landscape.</i> <i>It is material that in the Spring of 2025, Natural England ceased work on the Chilterns boundary extension review, along with other candidate projects. The distance and intervening topography to the east of this application site result in a very marginal impact upon the setting of the Chilterns, and we accept that this would not harm the special qualities following an appraisal of visual impacts alone.</i> <i>In taking a more holistic view of the impacts upon the Chilterns, we would seek assurances that the River Gade's ecology is not impacted. The applicants within their submitted landscape and visual impact assessment and/or ecological assessment are welcome to comment on the wider implications upon the River Gade and the recreational impacts upon footpaths and green infrastructure more generally. We would welcome an addendum to the landscape assessment with a Chilterns perspective'.</i>	

6 REFERENCES

MHCLG (2024) *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government.

Natural England and Forestry Commission (2022) *Standing advice for ancient woodland, ancient and veteran trees: protecting them from development*.

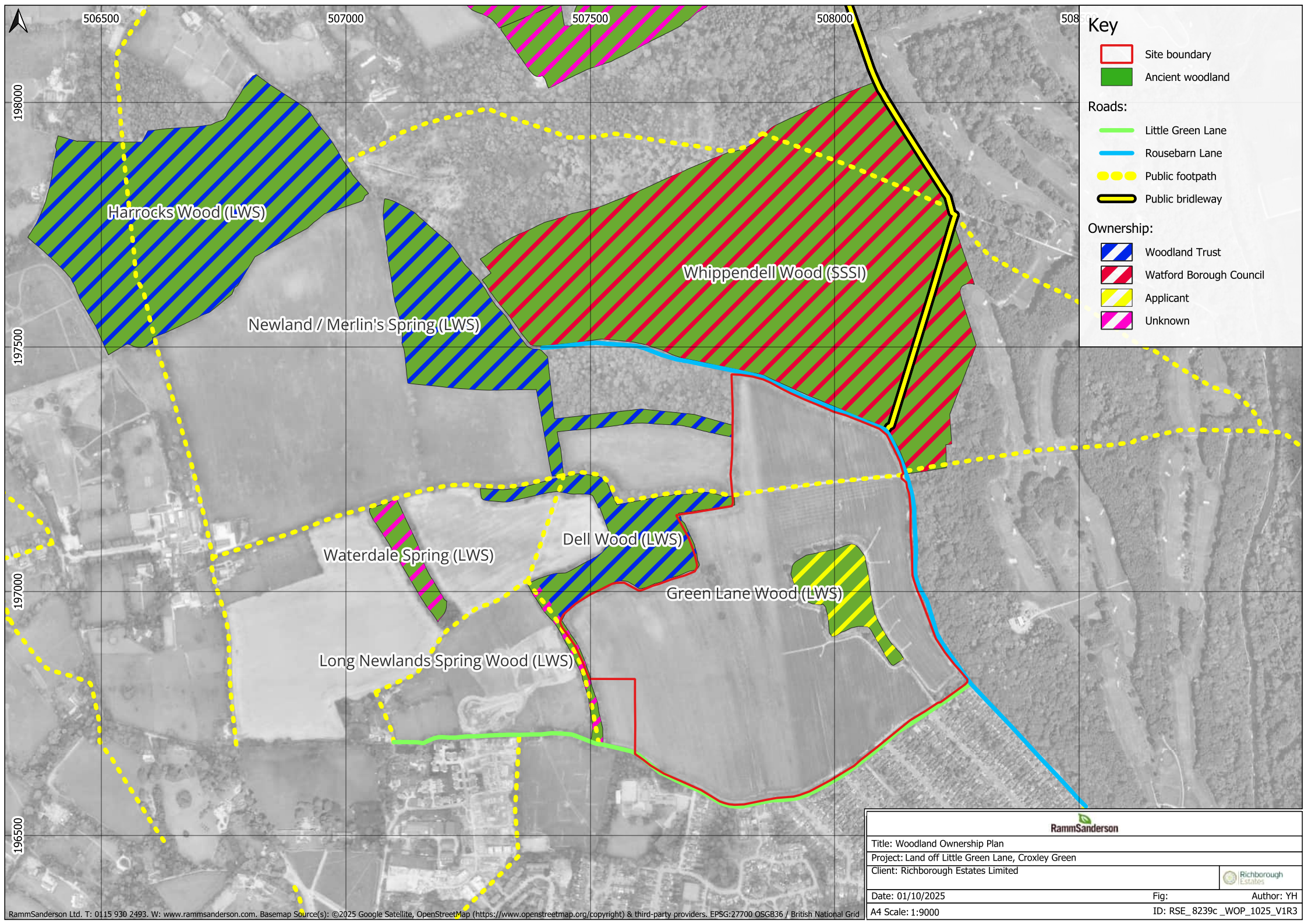
RammSanderson Ecology Ltd (2024) *Ecological Impact Assessment: Land north of Little Green Lane, Croxley Green* (Ref. RSE_8239_R1_V4_EcIA). Prepared on behalf of Richborough.

Three Rivers District Council (2011) *Core Strategy*.

Three Rivers District Council (2013) *Development Management Policies Local Development Document*.

7 FIGURES

Figure 1 Ancient Woodland Location and Ownership Plan



Key

- Site boundary
- Ancient woodland

Roads:

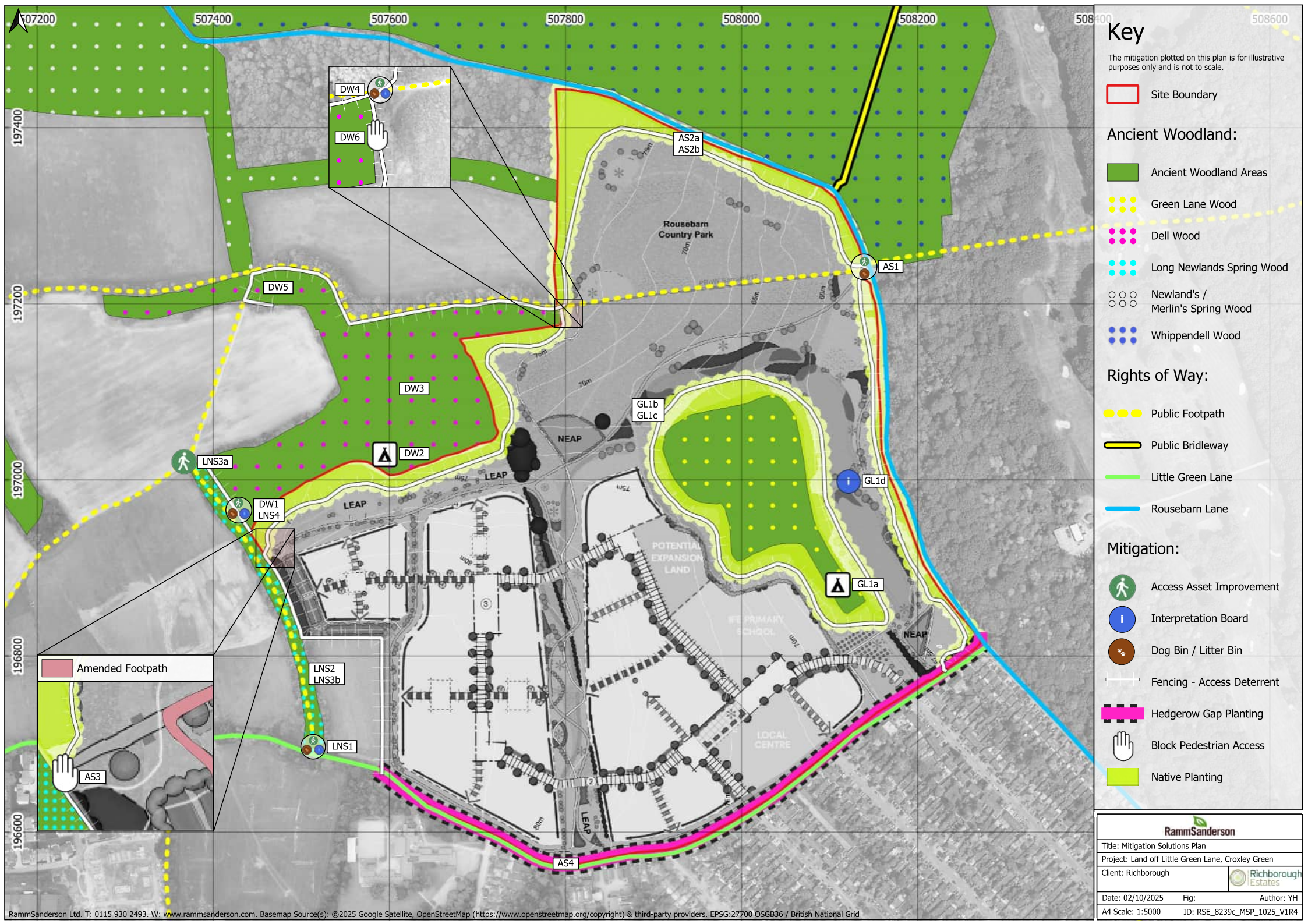
- Little Green Lane
- Rousebarn Lane
- Public footpath
- Public bridleway

Ownership:

- Woodland Trust
- Watford Borough Council
- Applicant
- Unknown

		
Title: Woodland Ownership Plan		
Project: Land off Little Green Lane, Croxley Green		
Client: Richborough Estates Limited		
Date: 01/10/2025		Author: YH
A4 Scale: 1:9000		Fig: ID: RSE_8239c_WOP_1025_V1R3

Figure 2 Mitigation Solutions Plan



Key

The mitigation plotted on this plan is for illustrative purposes only and is not to scale.

 Site Boundary

Ancient Woodland:

-  Ancient Woodland Areas
-  Green Lane Wood
-  Dell Wood
-  Long Newlands Spring Wood
-  Newland's / Merlin's Spring Wood
-  Whippendell Wood

Rights of Way:

-  Public Footpath
-  Public Bridleway
-  Little Green Lane
-  Rousebarn Lane

Mitigation:

-  Access Asset Improvement
-  Interpretation Board
-  Dog Bin / Litter Bin
-  Fencing - Access Deterrent
-  Hedgerow Gap Planting
-  Block Pedestrian Access
-  Native Planting

 RammSanderson

Title: Mitigation Solutions Plan		
Project: Land off Little Green Lane, Croxley Green		
Client: Richborough		
Date: 02/10/2025	Fig:	Author: YH
A4 Scale: 1:5000	ID: RSE_8239c_MSP_1025_V1R4	

8 APPENDICIES

Appendix 1 Illustrative Masterplan



KEY

- SITE LOCATION
- PUBLIC OPEN SPACE AND AMENITY SPACE
- HARD LANDSCAPE FEATURE SQUARES/ FOCAL SPACES WITH PEDESTRIAN/CYCLE PRIORITY
- EXISTING TREES
- NEW TREE PLANTING
- WILDFLOWER / LONG GRASS
- COMMUNITY ORCHARD
- AREA FOR PLAY
- SUSTAINABLE DRAINAGE
- TRIM TRAIL ROUTE (2KM)
- PROPOSED NATIVE THICKET PLANTING
- PROPOSED ORNAMENTAL SHRUBS
- PROPOSED HEDGEROW
- SWALE
- MOWN PATHS
- PROPOSED SHARED PEDESTRIAN / CYCLE WAY ALONG CANTERBURY ROAD

KEY PRINCIPLES

1. PROPOSED DEVELOPMENT ACCESS VIA DURRANTS DRIVE AND LINKS WAY,
2. PRIMARY STREET AND BUS ROUTE,
3. FOCAL SPACE WITH AREAS OF LANDSCAPING, PLAY AND RECREATION,
4. ACTIVE TRAVEL ROUTES, TRIM/FITNESS TRAIL
5. PEDESTRIAN ROUTES PROVIDING ACCESS TO ALL AREAS OF PUBLIC OPEN SPACE,
6. RETENTION AND BUFFER TO THE ANCIENT WOODLAND AND EXISTING VEGETATION,
7. PROPOSED NATIVE WOODLAND PLANTING TO BUFFER ROUSEBARN LANE AND ANCIENT WOODLANDS,
8. NEW LANDSCAPE AND RETAINED HEDGEROW TO THE PERIMETER OF DEVELOPMENT,
9. WILDFLOWER PLANTING AND NEUTRAL GRASSLANDS PROMOTING BIODIVERSITY AND HABITAT CREATION,
10. WETLAND FEATURES WITH ASSOCIATED BANKSIDE AND AQUATIC VEGETATION,
11. COMMUNITY SPACE,
12. AREAS OF EQUIPPED PLAY AND RECREATION FOR OLDER CHILDREN/TEENAGERS,
13. LOCAL PLAY AND NATURAL PLAY FOR YOUNGER CHILDREN,
14. DWELLINGS OVERLOOKING NEWLY CREATED AREAS OF PUBLIC OPEN SPACE,
15. VIEW CORRIDOR TO DURRANTS HOUSE
16. BUS GATE.

Appendix 2 Illustrative Landscape Strategy



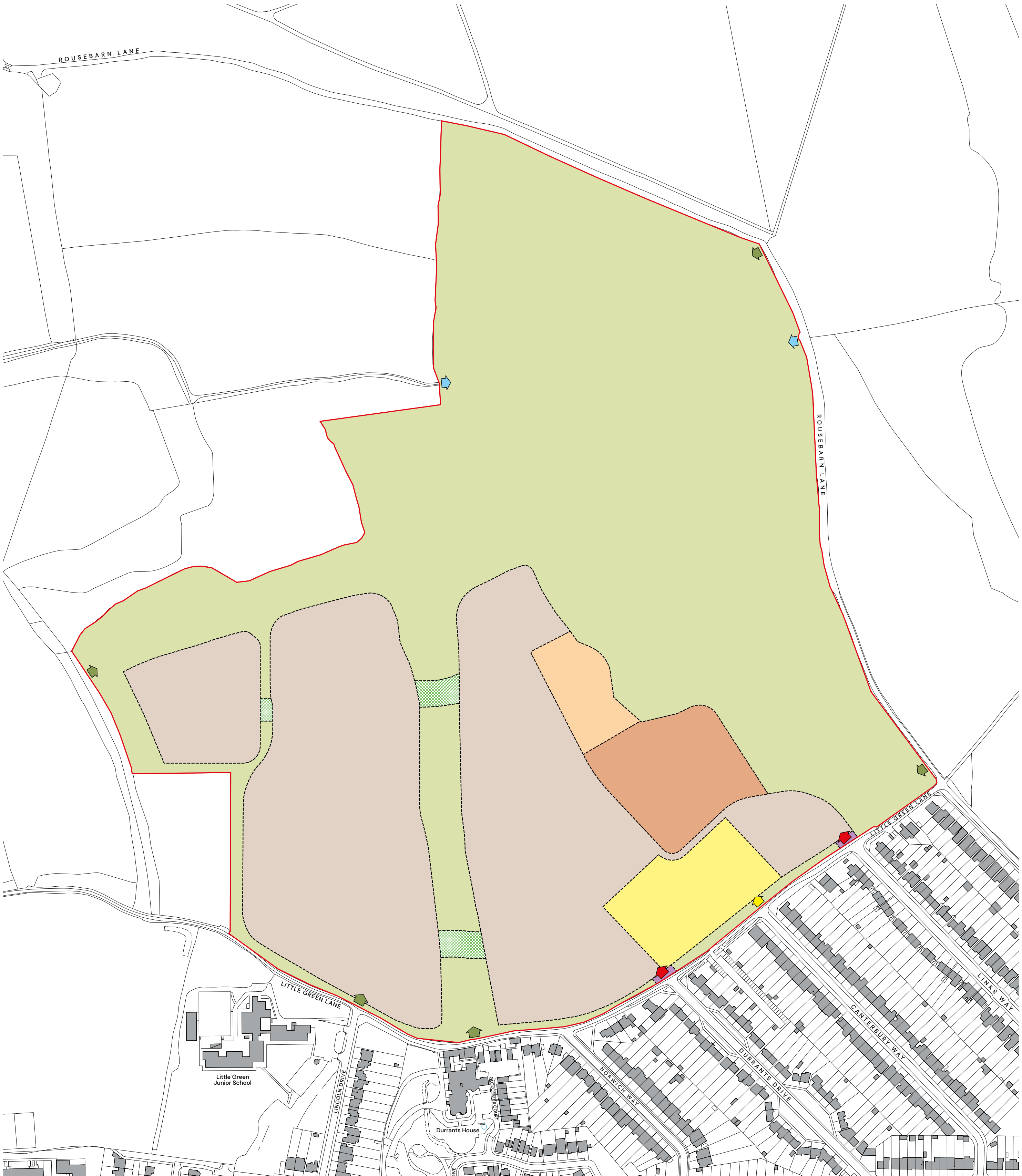
- Site boundary
- Existing vegetation
- Existing vegetation to be removed
- Proposed native trees
- Proposed native thicket planting
- Proposed ornamental shrubs
- Proposed hedgerow
- Wildflower/long grass
- 3m wide cycleway
- 2m wide footway
- Hoggin path
- Mown path
- Paved square
- Drainage basins and swales
- Marginal and aquatic planting
- Decking area
- Locally Equipped Area for Play
- Neighbourhood Equipped Area for Play
- Community orchard
- Community allotments
- Bandstand/pavilion
- Focal feature e.g. public art or sociable seating
- Local Area for Play
- Trim trail station
- Seating area
- 2.5km circular route
- Public footpath
- Bridleway
- Lanes
- Informal kickabout area

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CLIENT			Richborough		
PROJECT			Land north of Little Green Lane, Croxley Green		
TITLE			Illustrative Landscape Strategy		
DRAWN BY	KL		CHECKED BY	RH	
SCALE @ A1	1:2,000		DATE	DECEMBER_2024	
PROJECT NO.	I000010		DRAWING NO.	DL02	REV. F

Appendix 3 Land Use Parameters Plan



LEGEND

Site boundary

LAND USE PARAMETERS

Indicative area of land required for the proposed access, not within the residential land use (subject to detailed design)

Indicative area of land required for internal access roads not within the residential land use (subject to detailed design)

Proposed residential development (Use Class C3(a)) and a 5-bedroom property for children's social care and supported living (Use Class C3(b)) (including roads, footpaths, private drives, amenity and incidental open space and other associated infrastructure)

Proposed open space (including amenity green space, children's play provision, allotments, country park, landscaping, footpaths, drainage and other associated infrastructure)

Proposed mixed-use local centre including provision for NHS health and social care services (Use Class E(e)); community building (Use Class F2); retail and café provision (Use Class E(a-c)); and residential dwellings (Use Class C3) (including amenity space, landscaping, footpaths, drainage, car parking and other associated infrastructure, subject to detailed design)

Proposed one form entry primary school (Use Class F1(a)) and associated infrastructure (subject to detailed design)

School expansion land (subject to detailed design)

ACCESS PARAMETERS

Proposed access/egress for all modes (subject to detailed design)

Potential access/egress for cyclists and pedestrians only (subject to detailed design)

Potential access/egress for pedestrians only (subject to detailed design)

Existing public right of way access retained

0

100m

N

REV E: Access points amended/added (04.06.25 CM)

REV D: Amended legend classifications (03.12.24 CM)

REV C: Access point to PROW on western boundary amended (09.12.24 CM)

REV B: Amended access point and legend (06.12.24 CM)

REV A: Amended areas (03.12.24 CM)

FIRST ISSUE: For client comment (29.11.24 CM)

Appendix 4 Consultee Comments



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

18th February 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

Objection – impact on Woodland Trust sites and 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

The Trust **objects** to this planning application on the basis of deterioration of Woodland Trust sites, and ancient woodlands designated on Natural England's Ancient Woodland Inventory (AWI), as detailed below:-

- Woodland Trust site Dell Wood (grid ref: TQ 07630 97103) - designated Ancient Semi Natural Woodland
- Woodland Trust site Harrocks Wood / Newland's Spring Wood (grid ref: TQ 07632 97418) - part designated Ancient Semi Natural Woodland

The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Telephone

01476 581111

Facsimile

01476 590808

Website

woodlandtrust.org.uk

- Long Newland's Spring (grid ref: TQ 07448 96826) - designated Ancient Semi Natural Woodland
- Green Lane Wood (grid ref: TQ 08013 97009) - designated Ancient Semi Natural Woodland
- Whippendell Wood (grid ref: TQ 07939 97631) - designated Ancient Semi Natural Woodland, SSSI, and Wood Pasture and Parkland

Impact on Ancient Woodland

The application is for 600 dwellings, a school and associated infrastructure on land which includes, and is adjacent to, areas of ancient woodland and Woodland Trust sites. We are particularly concerned about the impact of the proposals on two Woodland Trust sites adjacent to the development - Dell Wood ancient woodland and Newland's Spring (part ancient woodland).

A key suggestion for mitigation of impacts on ancient woodland is the provision of a "Woodland Recreational Management Plan", the details of which are only briefly outlined in this application, but which appear to include both measures to manage recreational impacts within the woodlands, such as signposting and fencing, and measures to deter the public from accessing woodlands. We are not aware that the Woodland Trust Operational or Land & Property teams have been consulted with regards to any such measures or approached regarding any associated permissions.

The Ecological Impact Assessment concludes that the implementation of a Woodland Recreational Management Plan, together with an un-encroached buffer of 15 metres and a further encroached buffer of 15 metres, will be sufficient to mitigate impacts on Dell Wood and "*maintain the level of biodiversity within the woodland*". However, there is no evidence provided in the application to support this conclusion.

As far as we are aware, the applicant has not approached the Woodland Trust to better understand or survey biodiversity within our woodland. It is not clear, on the basis of the information provided, whether it would be feasible to ensure that for example, sensitive species are not disturbed by noise and recreation; that sensitive ground flora will not be trampled; that pollution or disturbance from dogs will be avoided; or that cat predation will be controlled.

Dell Wood is already experiencing significant deterioration. The name "Dell Wood" is a reference to the large hollow within the woodland, which currently suffers from anti-social behaviour, fires and barbecues. This has resulted in a large area of compacted bare ground within the woodland and high levels of discarded items and broken glass. The hollow is surrounded by vegetation, which increases the risk of fire spreading through the woodland during periods of drought.

The Woodland Trust is not in a position to agree to the principle of a development of this nature and scale at this location in the absence of a robust evidence-based assessment of the impact on Dell Wood and proposals for mitigation.

We have similar concerns with regards to Newland's Spring wood, although to a lesser extent as this woodland would be adjacent to the new Country Park and further from built up areas.

Natural England and Forestry Commission have identified impacts of development on ancient woodland and veteran trees within their standing advice¹ (see annex at the foot of this document for the full range of impacts outlined). This guidance should be considered the Government's position with regards to development impacting ancient woodland or veteran trees.

We note that Natural England has specified a "minimum 30 metre buffer" and has drawn attention to the need for the local planning authority to consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193(c) of the NPPF and the standing advice.

The applicant is proposing 15 metres of undeveloped buffer, with a further 15 metre zone incorporating some development, such as pathways and allotments. However, there is no supporting assessment to demonstrate that these proposals will be adequate to prevent impacts on the woodland from the increase in recreational pressure associated with a housing development of this scale.

The appropriate width, design and management of a buffer zone will be influenced by numerous factors, including, but not limited to: the proposed housing mix and density; the nature and extent of existing development close to ancient woodland; existing recreational use of the woodland; the position of the woodland within the landscape in relation to the development; and the design of the development, including green space and available options for activities such as recreation and dog walking.

It is stated in the Ecological Impact Assessment that the pressures on Dell Wood could be of a similar magnitude to the pressures on Green Lane Wood, and yet the circumstances are completely different. There are public footpaths leading directly to Dell Wood from the development site, whereas Green Lane Wood would be enclosed with barrier fencing. It is not clear why Green Lane Wood would be provided with an un-encroached 30 metre buffer, whereas Dell Wood would be provided with a 15 metre un-encroached buffer. Even with a 30 metre buffer, the applicant concedes that it would not be possible to fully mitigate all potential negative urban edge impacts to Green Lane Wood.

In addition to the woodlands discussed above, we are concerned that impacts have not been assessed with regards to the finger of ancient woodland (Long Newland's Spring) connecting Dell Wood with Little Green Lane. This woodland will be particularly vulnerable to intensified use due to its extremely narrow width, and the location of the public footpath within it. The application should include an assessment of the impact of the development on Long Newland's Spring.

With regards to lighting, it is unclear how lighting will be controlled into the future as residents make changes to their properties. We are aware of research that suggests light pollution above 0.1 lux around ancient woodland and ancient and veteran trees will elicit responses in animals (Azam et al., 2018)². Mitigation of light pollution through buffers and screened zones that result in light pollution levels of 0.1 lux or below is suitable mitigation.

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

² Azam, C., Le Viol, I., Bas, Y., Zissis, G., Vernet, A., Julien, J., Kerbiriou, C. 2018. Evidence for distance and illuminance thresholds in the effects of artificial lighting on bat activity. *Landsc. Urban Plan.* 175, 123-135. <https://doi.org/10.1016/j.landurbplan.2018.02.011>

To conclude, we have not been able to find any modelling to assess the level of intensification of access and use of the woodlands, and therefore it is not possible to fully understand the pressures on the various areas of ancient woodland, including Woodland Trust sites, from the increase in people, dogs and cats associated with a development of 600 houses. It does not appear that the scale of recreational pressure resulting from the housing mix has been properly considered through evidence-based analysis.

Protection for ancient woodland is outlined within National Planning Policy Framework (NPPF) at paragraph 193(c). This policy provides a test for developments and impact on ancient woodland. However, the test for impact is not a test of significance or magnitude, it is a test of whether there would be any negative impact.

In this case, not only has the feasibility of mitigating impact not been demonstrated, but the applicant has acknowledged that it will not be possible fully to mitigate impact with the current proposals. Feasibility of adequate mitigation needs to be demonstrated by the applicant before this outline application can be approved.

Impacts on Veteran Trees

We are concerned to ensure that all veteran trees on site have been correctly identified and appropriately protected. In this respect, we note that the RAVEN methodology has been used to assess for the presence of veteran trees.

The Woodland Trust does not use, or agree with, the RAVEN methodology as we consider that the application of a standard 'tick box' methodology and use of disqualifying factors such as girth is not in line with government guidance. Planning Practice Guidance for the 'Natural environment' ([Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment)), which is intended to clarify and interpret the NPPF, states: "Trees become ancient or veteran because of their age, size or condition. Not all of these three characteristics are needed to make a tree ancient or veteran as the characteristics will vary from species to species." The Arboricultural Association provides further information here [Arboricultural Association - VETcert \(trees.org.uk\)](https://www.arboricultural.org.uk/vetcert).

When assessing veteran status, size alone should not be a disqualifier and we would expect to see full consideration of the tree's condition and whether significant decay features have been identified, in line with the most recent government definition provided within The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. This states:

"Ancient and veteran trees can be found as individual trees or collections of trees in any setting.

Ancient trees have passed beyond maturity into an ancient life stage or are old in comparison with other trees of the same species which exhibit one or more of the following—

(i) demonstrably great age relative to others of the same species

(ii) changes to their crown and trunk development indicative of the ancient life stage

Veteran trees are mature trees that share physical and other characteristics in common with ancient trees, due to their life or environment, but are neither developmentally nor chronologically ancient. All ancient trees are veteran trees, but not all veteran trees are ancient. Veteran and ancient trees which have died are still recognised as such because they retain significant biodiversity value for many decades.

Veteran trees exhibit one or more of the following—

- (i) significant decay features such as deadwood, hollowing or signs of advanced decay in the trunk or major limbs*
- (ii) a large girth, depending on and relative to species, site and management history*
- (iii) a high value for nature, especially in hosting rare or specialist fungi, lichens and deadwood invertebrates"*

We would therefore encourage the involvement of the Council's tree officer to help determine the veteran status of trees on site. For example, we are concerned that oak tree T15 may need further assessment, and that its relatively small girth may have resulted in potential veteran status being ruled out. Any veteran trees on site should be provided with a veteran tree buffer zone in line with the standing advice.

Supporting Information - 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 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'³. 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."*

Supporting Information - Veteran Trees

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 trees⁴. They are

³ <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>

⁴ <https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf>

irreplaceable keystone structures disproportionately supporting ecosystem function and acting as critical refugia for biodiversity. Where they occur outside of woods they are also particularly important for landscape connectivity.⁵ They are an essential part of our landscape and cultural heritage.

Natural England and Forestry Commission's standing advice on ancient and veteran trees states that they *"can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats."*

"A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value."

"An ancient tree is exceptionally valuable. Attributes can include its: great age; size; condition; biodiversity value as a result of significant wood decay and the habitat created from the ageing process; and cultural and heritage value."

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

Conclusion

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

The Trust **objects** to this planning application on the basis that the feasibility of mitigating deterioration of ancient woodland has not been demonstrated. The applicant should submit additional information to demonstrate that effective mitigation could be provided. Until such time as the application is supported by an evidence-based assessment, it is not possible to determine whether a development of this nature and scale could be delivered in accordance with the National Planning Policy Framework.

Please don't hesitate to contact us at planningcasework@woodlandtrust.org.uk if it would be helpful to discuss any of the points raised.

⁵ [Ancient and veteran trees. An assessment guide. \(woodlandtrust.org.uk\)](https://www.woodlandtrust.org.uk/ancient-and-veteran-trees-an-assessment-guide/)

Kind regards

Cathy Johannesen
Programme Officer - Woods Under Threat

Annex

Natural England and Forestry Commission's standing advice:-

Ancient woodland, ancient trees and veteran trees: advice for making planning decisions

Direct and indirect effects of development:-

Development, including construction and operational activities can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby.

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:-

- *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*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*
- *damaging archaeological features or heritage assets*
- *changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss*

Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:-

- *breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects*
- *reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species*
- *reducing the resilience of the woodland or trees and making them more vulnerable to change*
- *increasing the amount of dust, light, water, air and soil pollution*
- *increasing disturbance to wildlife, such as noise from additional people and traffic*
- *increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*
- *changing the landscape character of the area*

Mitigation measures

Mitigation measures will depend on the type of development. They could include:-

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

Use of buffer zones

Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the:-

- scale and type of development and its effect on ancient woodland, ancient and veteran trees*
- character of the surrounding area*

For example, larger buffer zones are more likely to be needed if the surrounding area is:-

- less densely wooded*
- close to residential areas*
- steeply sloped*

Buffer zone recommendations

Where possible, a buffer zone should:-

- contribute to wider ecological networks*
- be part of the green infrastructure of the area*

A buffer zone should consist of semi-natural habitats such as:-

- woodland*
- a mix of scrub, grassland, heathland and wetland*

The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.

You should not approve development proposals, including gardens, within a buffer zone.

You should only approve sustainable drainage schemes if:-

- they do not affect root protection areas*
- any change to the water table does not negatively affect ancient woodland or ancient and veteran trees*

We have been notified of this application and would like to submit comments.

As the Government's forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient semi natural Woodland as well as other woodland. We are particularly concerned about any impact on Ancient Semi natural Woodland and will expect to see careful consideration of any impact when assessing the site.

The site is directly adjacent to Dell Wood and Long Newland's Spring Ancient Semi Natural Woodlands, with Green Lane Ancient Semi Natural Woodland within the site.

Ancient Woodland:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

Decisions should be made in line with paragraph 193 (c) of the National Planning Policy Framework (Dec 2024), which states:

"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 and a suitable compensation strategy exists"

As Ancient woodland, ancient trees and veteran trees are irreplaceable, you should not consider proposed compensation measures as part of your assessment of the merits of the development proposal.

We particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and ["Keepers of Time" – Ancient and Native Woodland and Trees Policy in England](#).

The Joint NE/FC Standing Advice states that both the direct and indirect effects of development should be considered for both the construction and operational phases of the proposed development.

Not just including the potential for actual construction to impact on soils, trees and tree roots. But also the potential for effects when the residential development is in use.

Other impacts to the ancient woodland, for example reducing the resilience of the woodland and making it more vulnerable to change. Increasing the amount of dust, light, air and soil pollution and increasing disturbance to wildlife, also trampling of plants, erosion of soil and noise from additional people, traffic and domestic pets.

Ancient Woodland Buffer:

The Standing Advice also states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic.

Whilst we note plans for a 30m buffer for the ancient woodlands, and plans for thorny shrub planting in the buffer zone, the application may still have the potential to cause deterioration to the ancient woodland. Although the buffer may be sufficient to avoid direct soil compaction during construction, indirect soil damage and disturbance would still be expected due to the extent of the proposed development. Impacts from machinery, movement of the workforce and from new residents would be expected to cause a deterioration.

We would encourage considering a mix of habitat types to create a graded edge from the existing woodland including new woodland, scrub and species rich grassland with effective management that maximises biodiversity value. We also note the inclusion of amenity public open space and footpaths within the Ancient woodland buffer, these may be better located outside of the buffer, with the buffer itself managed as a semi natural habitat less attractive to be used as public open space.

Priority Habitat:

Both Dell Wood and Green Lane Wood are also listed as mixed deciduous woodlands on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Paragraph 187b of the NPPF states:

"Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."

Habitat Fragmentation and Connectivity:

Fragmentation is one of the greatest threats to mixed deciduous woodland and especially ancient woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.

The proposed development will not improve habitat connectivity between Dell Wood, Long Newland's Spring and Green Lane Wood. In fact, it could sever it completely. With Green Lane Wood becoming completely isolated in its landscape. While managed grassland and play areas are to be provided, there is a greater opportunity to provide habitat connectivity between Green Lane Wood and Dell Wood in particular.

With current plans, there would be very limited movement of species (flora and fauna) between habitat areas and therefore the species quality and diversity in the smaller, isolated woodland would likely decline and would be unlikely to improve (especially without appropriate management) and would further impact the woodland's resilience to future threats including climate change. The measures taken by the application to offset the proposal do not appear to take account for habitat connectivity or continuity.

Whilst we understand that all trees and woodlands on site will be retained, there is an opportunity for increased woodland planting between the two woodlands to improve connectivity across the whole landscape.

Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between the existing woodland blocks on site, to link them and ensure maximum gains to increase habitat connectivity, to make woodlands more resilient and to benefit biodiversity across the whole site

Canopy Cover and Woodland Management:

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss.

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas near ancient woodlands.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, including deer management and would recommend the creation of a UK Forestry Standard compliant management plan, access also needs to be considered for future management.

Active management of woodlands, especially ancient woodlands, is essential for a host of reasons but crucially to create and maintain the valuable biodiversity element of these habitats. This diversity leads to greater resilience and productivity along with environmental benefits. The diversity and benefit of woodlands will be lost over time if they are neglected. These interventions are also crucial in the face of climate change where active management is needed to help woodlands adapt.

If the Local Authority is minded to approve this application, we would recommend that full details of any woodland protection measures, a woodland management plan, a planting plan including species selection and lighting strategy to avoid illuminating all woodlands on site and adjacent to it, be provided at the reserved matters stage.

We hope these comments have been useful to you. If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

Local Partnership Advisor
East & East Midlands

Tel: 07900 227123

Sandra.Squire@forestrycommission.gov.uk



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From: Claire Westwood <claire.westwood@threerivers.gov.uk>
Sent: 11 Jun 2025 07:24:40
To: TR.EDMSmyemails@threerivers.gov.uk
Cc:
Subject: Land North of Little Green Lane, Croxley Green, WD3 3SP - 24/2073/OUT
Attachments:

From: Squire, Sandra
Sent: 10 June 2025 14:31
To: Claire Westwood
Subject: RE: Land North of Little Green Lane, Croxley Green, WD3 3SP - 24/2073/OUT

Dear Claire

Thank you for contacting us regarding changes to the application. While any separation between the suds and the woodland is to be welcomed, we have rather more concerns regarding the potential increase in recreational pressures on the ancient woodlands within and adjacent to the site. The minimum suggested buffer mentioned in the Natural England/Forestry Commission Standing advice is more suited to a single dwelling, rather than a large development of up to 600 dwellings. With the associated direct and indirect impacts of both development, traffic, people and domestic pets.

Larger planted buffers, better connectivity between woodlands, provision of alternative recreational space and appropriate woodland management may go some way to mitigate these effects. However an assessment of the impacts of the development on the woodland habitats as a whole should be undertaken before appropriate mitigation can be proposed.

It is however worth noting that The Town and Country Planning (Consultation) (England) Direction 2024 (published January 2024) requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, including development that affects ancient woodland: [The Town and Country Planning \(Consultation\) \(England\) Direction 2024 - GOV.UK \(www.gov.uk\)](#)

Strategic tree planning can also be used to assist with minimising flood risk on some sites and should also be a consideration.

If you need any further information, please don't hesitate to contact me

Best wishes

From:

Sent: 02 April 2025 15:20

To: Claire Westwood <[REDACTED]>

Cc:

Subject: 24/2073/OUT - Land To North Of Little Green Lane Croxley Green

Hi Claire,

The site is in Metropolitan Green Belt and the woodland within its boundary is recorded as ancient on the Ancient Woodland Inventory. Within the fields are a number of notable and / or veteran field and hedgerow trees. There is a Right of Way (Public Footpath Sarratt 017) running east / west across the northern end of the site and another (Public Footpath Sarratt 063) running north / south along the western boundary. There are trees and woodland bordering the site that are protected by Tree Preservation Order (TPOs 182; 026 & 118). Most of this woodland is also recorded as ancient, and some of the woodland (Whippendell wood) is a designated SSSI (Site of Special Scientific Interest).

The National Planning Policy Framework states that:

'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;

70 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.'

The outline plans indicate that there will be no direct impacts on trees and woodland on the site. With no trees needing to be felled or pruned, and no loss of irreplaceable habitats. In addition, no development is proposed to take place within the root protection areas of retained trees. Although some short sections of existing hedgerow would need to be removed.

However, the potential for indirect impacts on trees and woodlands, and the deterioration of irreplaceable habitats over the longer term, are significant. The proposal to site up to 600 new dwellings within 30 metres (at the closest points) to ancient woodland and notable / veteran trees would result in a significant increase in the residential population close to these irreplaceable habitats. This increase in population would inevitably lead to additional recreational pressures on the trees and woodland, such as the compaction of soils around important trees; the trampling of ground flora in woodland areas; erosion and widening of footpaths through woodland areas; and the disturbance of wildlife, through activities such as dog walking.

Other unintentional impacts of an increased population would be increased localised air and water pollution from vehicle movements, and the use of pesticides in gardens and allotment areas.

There will also be additional anti-social behaviour issues relating to an increased population. This may include vandalism; arson; off-road motorcycling and mountain biking; and fly-tipping, which would all contribute towards the deterioration of this irreplaceable habitat. Placing development close to notable and veteran trees and incorporating them into more formal green spaces will also increase the level of risk should a tree fail. This could be detrimental to these ecologically important trees if overzealous safety works to fell or heavily prune them is undertaken to address perceived safety concerns.

To prevent any long-term deterioration of these irreplaceable habitats would require a suitable compensation and mitigation strategy. The plans indicate that buffer zones between the housing areas, and the woodlands and trees, would be created, comprising of a Country Park, formal areas of green space, and allotment sites. These will provide some mitigation but over the long term, managing visitor access and pressure to the surrounding woodland and being able to deal with antisocial behaviour issues will be key to preventing the deterioration of the trees and woodlands. To successfully manage the open space, and visitor access and recreation, would require some form of ranger team or on-site maintenance staff to be able to respond to issues effectively and quickly. This ongoing management and maintenance would need to be adequately funded and resourced to ensure the irreplaceable habitats are protected over the long term.

Kind regards

Alex Laurie MA ArborA MCIEEM

Principal Trees and Woodlands Officer

Three Rivers District Council

www.threerivers.gov.uk



Chilterns
National
Landscape

Contact: Michael Stubbs MRTPI
Email: planning@chilterns.org.uk

By portal upload to

My Ref: F:\Planning\DM\Three Rivers\Little Green lane Croxley Green.
21st July 2025

By email to the planning case officer.

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

Three Rivers DC reference: 24/2073/OUT

CCB Comments.

Thank you for consulting the Chilterns Conservation Board (CCB). Our duties and responsibilities are set out in the Countryside and Rights of Way Act 2000, at section 87, and we have confined our scrutiny of this application to ensuring it falls within this duty.

The statutory boundary of the Chilterns AONB/National Landscape is set away from the application site and lies some 2.4 to 2.6km to the west of the submitted red line. The landscape within and surrounding the application site shares several characteristics with the Chilterns landscape, notably narrow and partly sunken lanes, dry chalk valley features, and a chalk plateau landscape. The River Gade, a Chilterns Chalk stream and valley landscape, is located approximately 2-3 km to the east of the application site. This flows from within a source within the National Landscape.

It is material that in the Spring of 2025, Natural England ceased work on the Chilterns boundary extension review, along with other candidate projects. The distance and intervening topography to the east of this application site result in a very marginal impact upon the setting of the Chilterns, and we accept that this would not harm the special qualities following an appraisal of visual impacts alone.

In taking a more holistic view of the impacts upon the Chilterns, we would seek assurances that the River Gade's ecology is not impacted. The applicants within their submitted landscape and visual impact assessment and/or ecological assessment are welcome to comment on the wider implications upon the River Gade and the recreational impacts upon footpaths and green infrastructure more generally. We would welcome an addendum to the landscape assessment with a Chilterns perspective.



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Chilterns
National
Landscape

To assist all parties, we have recently produced the Chilterns Chalk Streams Planning Guidance (in collaboration with Land Use Consultants), which was released a few weeks ago. This specifically sets out development management policies, and we welcome assurances that the Gade is unaffected.

This new guidance may be accessed at
<https://www.chilterns.org.uk/news/new-planning-guidance-launched-to-protect-fragile-chalk-streams/>

Yours faithfully

Chilterns Conservation Board (Chilterns National Landscape)

Station Road

Chinnor

Oxon

OX39 4HA

21st July 2025



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From: Planning <Planning@chilterns.org.uk>

Sent: 21 July 2025 17:16

Subject: Re: 24/2073/OUT

Dear Claire,

Many thanks for this. I had initially reviewed this back in Feb and screened it for 'no comment', but should have informed TRDC of that - apologies.

Fortuitously, we have just produced Chalk Streams planning guidance (published two weeks ago). In view of the River Gade, which is located some distance to the east, we thought it useful to obtain, and if it is the applicant's reassurance on that. The new guidance is linked and set out in the attached pdf.

I hope this may assist and if easier for me to load to the TRDC portal, feel free to let me know.

Many thanks and also for this opportunity to add a few comments. We can confirm, as in the attached letter, that there would be no physical impact upon the visual setting of the NL/AONB (following the Landscape Institute's approach).

All best wishes

Michael

Dr Michael Stubbs MRTPI

Planning Adviser

Chilterns National Landscape

Planning@chilterns.org.uk