# PROOF OF EVIDENCE - DETERIORATION OF ANCIENT WOODLAND

**Statement of on behalf of local resident group, Stocksmoor Vision**

**Appeal by Newett Homes**
**Erection of residential development with associated access, parking, public open space, landscaping and infrastructure**
**Site at land north east of Shepley Road, Stocksmoor, Huddersfield, HD4 6XW**

**Planning Reference: 2024/62/91242**
**Appeal Reference: APP/Z4718/W/25/3375000**
**Appeal Start Date: 24 November 2025**

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# FOREWORD

***'As the terrestrial habitat most representative of original, natural, stable conditions, ancient woodland is home to more threatened species than any other habitat in the UK.*** *This has been documented by the UK Biodiversity Steering Group (1995), showing that broadleaved woodland supports almost twice as many species of conservation concern as any other habitat, e.g. more than twice as many as chalk grassland and almost three times as many as lowland heathland…'*

***'Ancient woods have high intrinsic value, as sites where the interactions between plants, fungi, animals, soils, climate and people have developed over hundreds of years.*** *As a result, they are functionally irreplaceable and cannot be re-created…'*[1]

[1] Our emphasis. Both quotes from *'Impacts of nearby development on the ecology of ancient woodland',* The Woodland Trust, Corney, Smithers, Kirby, Peterken, Le Duc, & Marrs [2008]. The second quote goes on to cite Defra [2007]; Forestry Commission/Defra [2005]; Kirby & Goldberg [2002]; Land Use Consultants [2001]; Thomas et al. [1997]; and Woodland Trust [2002a].

**Statement of**

I am a resident of Stocksmoor and I make this statement on behalf of Stocksmoor Vision.

## SUMMARY ARGUMENT

1. Nestled in the valley floors below Stocksmoor sit two woodlands: *Shepley Mill Wood* and *Hartley Bank Wood.* Both are **Ancient Woodland**. Both are 'irreplaceable habitats' and—as a result—both have special planning protection.

2. Each is under 'deterioration' threat from the development. However, while both Newett and Kirklees Planning comment on the risks to *Shepley Mill Wood,* neither appears to have considered *Hartley Bank Wood*.

3. Yet as explained below, this second **Ancient Woodland** already experiences 'deterioration' effects from existing Stocksmoor surface water and sewage outflows. Adding a further 50 houses is likely to materially amplify these effects.

4. In terms of *Shepley Mill Wood* [*the closest of the two woods*], the draft Statement of Common Ground indicates that if Newett takes limited basic steps [*such as a 15m 'buffer' and special precautions during construction*], Kirklees Planning will not contest the appeal on any **Ancient Woodland** grounds.

5. Government guidance[2] and Woodland Trust materials[3] describe the many possible impacts a development can have on **Ancient Woodland** (and its soils, flora and fauna), both during and after construction.

6. Based on these materials—and our analysis of Newett's Ecological Impact Assessment and Flood Risk Assessment—we conclude that various key impacts have either been underestimated or left out of consideration. This means that vital planning principles have not been properly applied.

7. Because we are not technical experts, we rely on simple observation and logic. We factor for the very steep local gradients and underlying geology. Both are likely to significantly amplify contamination and disturbance effects on *Shepley Mill Wood* (and its soils, flora and fauna) during the construction phase [*via, for example, noise, dust, chemicals, liquids, mud, light and vibration*].

8. The steepness of the gradients also calls into question the adequacy of a 'basic' 15m buffer. Advisory and guidance materials point to this being a minimum and government guidance indicates that—by steep slopes (as here)—buffers should be larger than this.

9. Our analysis also takes account of the various hydrological pathways [*watercourses, dikes, sewer systems and underground infiltration pathways*] that would convey contaminants and pathogens from the site to **Ancient Woodland** (either *Shepley Mill Wood* or *Hartley*

[2] *'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions'* [including its 'click-throughs'] gov.uk, Natural England and Forestry Commission [2022]

[3] *'Impacts of nearby development on the ecology of ancient woodland'*, The Woodland Trust [Corney, Smithers, Kirby, Peterken, Le Duc, & Marrs] [2008]; *'Impacts of nearby development on ancient woodland - addendum',* The Woodland Trust, Luci Ryan [2012]

*Bank Wood*) during both construction and post-construction phases. Steep gradients are relevant here, too, because they increase water pressure in, for example, sewage pipes.

10. In the same vein, it is not necessary to possess technical expertise to understand that if ecological surveys are done at the wrong time of year (as Newett's ecologist admits) then the full picture cannot be known.

11. Surveys done in December 2022 and February 2024—as these were—will, for instance, not necessarily reveal the presence of various protected species, such as reptiles, hazel dormice, great crested newts, roosting and foraging bats, and rare invertebrates (see **Appendix A**).

12. Domestic cats are an important factor in 'deterioration' effects. One academic paper has even gone so far as to describe them as *'among the most ubiquitous and environmentally damaging invasive predators on Earth'*[4].

13. Domestic cats are not stopped by buffer zones or fencing. Their faeces damage Ancient Woodland soils. Based on a research paper (see later), the estimated 12 or so cats that would live on the development might in total kill—over a 5-month April to August period—between c.760 and c.1748 reptiles, birds or mammals (see later for workings).

14. We therefore see it as unrealistic to claim—as Newett does and as Kirklees Planning appears to agree—that all these various forms of contamination, disturbance and predation (and therefore 'deterioration') can be eliminated by a few basic steps.

15. We also consider it technically incorrect to argue—as both these parties appear to do—that *non-material* or *non-significant* 'deterioration' to **Ancient Woodland** is permissible. If this is what NPPF had meant, it would have said so.

16. In this regard, NPPF accurately describes these habitats as 'irreplaceable'. If something is 'irreplaceable' then it cannot be 'replaced', 'repaired' or somehow compensated for via biological net gain.

17. **The development would in our view inevitably cause 'deterioration' to these two 'irreplaceable habitats'. In this way, § 193 (c) NPPF 2024 is engaged, and the appeal should be refused**.

18. We do not consider there to be any *'wholly exceptional reasons'* within the meaning intended by § 193 (c) NPPF 2024 (as explained by footnote 70).

19. When it comes to ecological impact, there is also the matter of Google Earth historical images of the development site itself (which is adjacent to the Ancient Woodland). These show the site as ploughed in around early 2021. All other Google Earth images (back to 2003) show the site unploughed.

[4] *'Population impacts of free-ranging domestic cats on mainland vertebrates'*, Loss and Marra, Frontiers in Ecology [2017]

20. There are questions as to whether Natural England consents under SI 2005 No.2522 were required for this ploughing and if so, whether they were obtained. Ploughing can remove original biological and ecological features that might otherwise impede development.

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21. Separately, we believe that there are other further grounds for refusal, which we cover in other proofs of evidence. They include that:

    (a) the development has general flood risk implications and would also *'increase flood risk elsewhere'* [*by increasing CSO flows in Thunderbridge*][see § 181 NPPF 2024] and that:

    (b) the development would be 'unsustainable' [*by reason of, for instance: highway risk for cyclists and walkers; near-complete absence of amenities; ill-health (increased pathogenic discharges into Thunderbridge Dike); and the difficulties of travelling anywhere other than by car*]

22. Highway risk on Stone Wood Lane is—as between Newett and Kirklees Planning—the principal issue in the case. In line with Kirklees Planning's position, we too agree that Stone Wood Lane is already at capacity.

23. However, we also believe that there is a further dimension to this, on which Stocksmoor Vision will submit a separate proof of evidence.

24. In brief, we say that 'conflict analysis'—not raw vehicle numbers—is a more meaningful way to assess both highway capacity and risk to walkers and cyclists.

25. Stocksmoor Vision's conflict analysis concludes that highway risks are materially higher than raw vehicle numbers would imply.

## PREVIOUSLY SUBMITTED DOCUMENTS

26. Stocksmoor Vision has submitted two formal documents to the Inquiry: its request for Rule 6 status and its Rule 6 Statement of Case.

27. We respectfully ask the Inquiry **to treat the following paragraphs from our Rule 6 Statement of Case as read into this proof of evidence**, as supplemented by our further comments made in the remainder of this proof.

28. For the Inquiry's convenience we include brief synopses (in faint text) of these paragraphs:

    (a) **Topography and geology of Stocksmoor**: **paragraphs 15 to 24; 44 to 46**. [*Brief synopsis: steep gradients throughout descending into fluvial valleys; slope above the Ancient Woodland (Shepley Mill Wood) at gradients of up to 1 in 3; underlying hard rock at shallow depth (c.2m); surface water drainage via infiltration unsafe with risk of re-emergence of flows and destabilisation of the slope; civil engineering work likely to require a breaker and possibly blasting, especially for the c.827 cubic metre attenuation tank to be built fairly close to the Ancient Woodland; breakers and blasting likely to generate noise and vibration at the upper end of the impact scale which will transmit into the woodland through the underlying hard rock; during construction risks of earth, rocks, cement, mortar, fuels and other pollutants moving down the hill into the Ancient Woodland.*]

    (b) **The drainage arrangements: paragraphs 25 to 31; 37 to 41; 47**. [*Brief synopsis: lack of capacity means that Yorkshire Water will only permit the main combined sewer to accept foul water from the development; surface water is to be run off separately through interception, attenuation and concentrated discharge into the local interconnected system of dikes which pass either through or alongside both sections of Ancient Woodland; in this way, surface-water-borne pollutants (e.g. car wash residues and garden chemicals) will contaminate both sections of Ancient Woodland; in addition, the CSO in Thunderbridge now monitors spills (33 in total for years 2021 to 2024); each spill ejects sewage waste into Thunder Bridge Dike, which runs alongside Hartley Bank Wood, contaminating this second Ancient Woodland with pathogens and other materials and chemicals; with foul waste (not surface water) being added from 50 more homes, the volumes running through the sewer would be higher and have even greater toxicity than now; steep gradients throughout would amplify all these effects.*]

    *(c)* **Ecological impacts: paragraphs 48 to 56** [*Brief synopsis: Ecological impact Assessment surveys conducted in February and December and would have missed certain species; once occupied, many permanent pressures on the woodland such as light, domestic pets, bird population conflicts; planting of inappropriate tree types; buffer zones may need to be as much as 400m in relation to birds.*]

## TOPOGRAPHY AND GEOLOGY - FURTHER COMMENTS

29. The magnitude of the forces generated by these steep gradients is underscored by the Lead Local Flood Authority's objection to permitting surface water to drain via infiltration into the underlying soil. The Authority's officer noted:

> **'The LLFA considers infiltration into the underlying soil as not being feasible due to the steeply sloping ground to the east of the development and the risk of re-mergence of flows that could destabilise the slope'**

30. The developer's *'Preliminary Geoenvironmental Report'* prepared by Lithos in 2022 ('the Lithos Report') describes part of the site's internal topography as follows:

> **Given the existing topography (the slope in the east with gradients of up to 1 in 3), some site regrade may be required, with the need for underbuild and retaining walls.**

31. As a result, the design of the site includes a large, 40m-long, attenuation tank of c.827 cubic metres (827,000 litres) plus a long retaining wall across the slope. The relevance is that to build both these, the construction works will be on a very large scale and will, we think, inevitably call for heavy machinery to be operated within the proposed 15m buffer zone.

32. Finally, one more 'deterioration' aspect—so far unaddressed—is the large volume of mud and debris that will inevitably be deposited on Shepley Road itself. This was a very noticeable and unpleasant side effect of the building operations on the nearby Newett site in Fenay Bridge.

33. There is, however, a key difference with Newett's Stocksmoor site. Here, the deposited mud and other debris on the road would constitute *contaminants* that could cause harm to the **Ancient Woodland**.

34. Even if Newett were to regularly clean the highway, heavy rainfall, passing traffic and the gravitational effects of the steep gradients could quickly move large amounts of this mud and debris down the steep road into the heart of the **Ancient Woodland**. This contamination would be just as harmful as materials moving down into the **Ancient Woodland** on the site itself.

## DRAINAGE ARRANGEMENTS - FURTHER COMMENTS

35. In its Appeal Statement of Case, Newett is at pains to stress that the drainage arrangements were acceptable to both Yorkshire Water and to the Local Lead Flood Authority (LLFA):

> **2.29 The Lead Local Flood Authority (LFFA) have confirmed that the surface water drainage strategy is acceptable subject to full technical standards being provided via condition (CD 4.9). Such a condition is acceptable to the appellant.**
>
> **2.30 Foul sewerage is proposed to be pumped to the existing 150mm diameter public combined sewer recorded in Shepley Road. Yorkshire Water have raised no objection to the proposal.**

36. A key question is whether the LLFA was aware that there was an **Ancient Woodland** below the site (as well as one further along the dike network) which could potentially be contaminated and damaged by chemical and other pollutants in the surface water run-off from the 50-house site. See **Appendices B, C** and **D**.

37. In the same way, it is reasonable to ask whether the Yorkshire Water officers who raised no objection to foul sewage being pumped into the main combined sewer were aware of:
    (a) the regular CSO spills
    (b) the manhole cover sewage spills on Garganey Trust land, flowing into Thunder Bridge Dike and
    (c) the presence of the **Ancient Woodland** (Hartley Bank Wood) immediately across the that Dike from the Garganey Trust nature reserve.

38. Garganey Trust said in its original 2024 planning objection that it had complained to Yorkshire Water about the sewage spills on its land but had received no substantive response. See **Appendices E, F** and **G**.

## ECOLOGICAL IMPACT - GENERAL FURTHER COMMENTS

39. The statement of common ground says that:

> **6.22 It is agreed that the impact and risks of the development on protected/important species are low and can be minimised with appropriate mitigation measures, subject to appropriately-worded conditions.**

40. We disagree with this on several levels. **First**, when it comes to **Ancient Woodland**, it is technically incorrect to talk in terms of 'low' impact and risks. The NPPF test is, in effect, whether the development would cause *any* deterioration. In the context of threatened species, a principal reason for this policy is set out in this excerpt from a Woodland Trust paper[5]:

> **As the terrestrial habitat most representative of original, natural, stable conditions, ancient woodland is home to more threatened species than any other habitat in the UK. This has been documented by the UK Biodiversity Steering Group (1995), showing that broadleaved woodland supports almost twice as many species of conservation concern as any other habitat, e.g. more than twice as many as chalk grassland and almost three times as many as lowland heathland**

41. **Secondly**, the site surveys for Newett's EIA were carried out at the wrong time of year, in December 2022 and February 2024.

42. Given this, it is unclear how Newetts and Kirklees Planning can say with confidence that the impact and risks are 'low', since by conducting surveys when they did, they may have missed many protected/important species.

43. The Natural England-DEFRA advice[6] includes the table at **Appendix A** which clearly shows when surveys should be conducted for various species.

44. **Thirdly**, a large attenuation tank and retaining wall are to be built on the site and all surface water is to be intercepted, attenuated and discharged through an existing watercourse to the northeast of the site. Previously that water would have infiltrated the underlying soil and moved gradually down the steep slope to the **Ancient Woodland** across (broadly) the whole width of the site.

45. With that infiltration route now blocked, a key potential consequence for the **Ancient Woodland** is that the water table may change to the detriment of the **Woodland's** ecology. Government guidance[7] is clear on the risks where this happens:

> **Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by: …**
>
> - **changing the water table or drainage**

[5] *'Impacts of nearby development on the ecology of ancient woodland',* The Woodland Trust, Corney, Smithers, Kirby, Peterken, Le Duc, & Marrs [2008].
[6] *'Protected species and development; advice for local planning authorities',* gov.uk, natural England and DEFRA [2025]('click-through' from *'Ancient woodland, ancient trees and veteran trees; advice for making planning decisions'* Natural England and Forestry Commission [2022])
[7] *'Ancient woodland, ancient trees and veteran trees; advice for making planning decisions'* Natural England and Forestry Commission [2022])

## ECOLOGICAL IMPACT - PREDATION BY DOMESTIC CATS

46. There is a great deal of research into the predatory behaviour of domestic cats, but there is much variation in the data.

47. It does seem clear, however, that many cats routinely kill significant numbers of other creatures, with one group of researchers[8] summing it up this way:

> **The domestic cat (Felis catus) is among the most ubiquitous and environmentally damaging invasive predators on Earth**

48. The researchers go on to say:

> **Cats have contributed to 26% of reptile, bird, and mammal extinctions (Doherty et al. 2016) and pose a global risk to threatened and endangered vertebrates (Bellard et al. 2016).**

49. The general consensus seems to be that one in four households has a cat, meaning one might expect 12 extra cats for the development.

50. With this in mind, another research paper from 2003[9] looked at the number of times a sample group of cats brought home prey to their owners. There were 986 in the sample. They brought home 14,370 items over a 5-month period from April to August.

51. A key question is what percentage of killed prey is brought home? This was not covered in the research paper, but the range indicated by general internet searches seems to be from around c.10% to 23%.

52. A simple calculation would therefore indicate that the 12 Stocksmoor cats, over the same 5-month period, would kill between c.1748 (10%) and c.760 (23%) reptiles, birds or mammals in the general area around the development.

53. The implications for deterioration to the wildlife in the **Ancient Woodland** are clear.

54. We also add that cat faeces are harmful to **Ancient Woodland** soils.

[8] *'Population impacts of free-ranging domestic cats on mainland vertebrates'*, Loss and Marra, Frontiers in Ecology,
[9] *'Predation of wildlife by domestic cats Felis catus in Great Britain'*, Mammal Review, Woods, Mcdonald, Harris [2003]

## ECOLOGICAL IMPACT - THE SITE COMPOUND

55. The EIA says:

> **A Pollution Prevention Plan shall be developed and implemented on Site to ensure no water pollution events occur during construction. This must include the use of silt fencing, cut off drains, or similar measures, on the top of the field to prevent site run off from travelling eastwards down the slope; therefore, protecting both the woodland and stream habitats.**
>
> **The site compound and storage are to be sited at least 10 m from the watercourse with no refuelling within 10 m of the stream or newly created watercourse. Spill kits shall be readily available on Site at key locations, such as adjacent to the stream, and all staff shall be trained in spill response. Further guidance is provided in CIRIA C532, 'Control of water pollution from construction sites: guidance for consultants and contractors'**
>
> **With the above measures in place, no significant residual effect is predicted and no contravention of wildlife legislation is anticipated.**

56. We do not agree with the conclusions concerning the site compound and storage. The implication is that the site compound will itself be within the proposed buffer zone. We consider that these arrangements pose a very serious risk of deterioration to the **Ancient Woodland**.

57. It is also misleading to talk in this context about 'wildlife legislation'. The rules on **Ancient Woodland** do not constitute 'legislation'. Instead, **Ancient Woodland** is very strongly protected through planning policy as laid down by the NPPF. Under this, no residual effects are acceptable.

## BUFFER ZONES

59. Newett's Appeal Statement of Case says:

> **2.32 The planning layout Rev J identifies a significant buffer to the woodland with dwellings being located 50 metres away from the woodland edge.**
>
> **2.33 The government guidance titled *Ancient woodland, ancient trees and veteran trees; advice for making planning decisions* confirms that *'for ancient woodland the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage'*. The 15m buffer zone accords with national guidance as a typical minimum and no identified harms have been raised to warrant a larger buffer zone. A zone of 15m is shown on the planning layout Rev J. Notwithstanding the guidance buffer zone, as identified above, the proposal makes provision for a standoff distance far in excess of this between the woodland and the proposed built form.**
>
> **2.34 The Woodland Trust (CD 4.3) advocate for a buffer of at least 30m from the woodland based on the scale of development. There is no direct link between the application site and the woodland. Whilst there is no justification for a 30 metre buffer zone, it is again reiterated that a 50 metre standoff has been provided within the layout. While areas of POS are included within 30 metres of the woodland, it is not expected that the use of this land would give rise to adverse harm to the woodland.**

60. We should firstly say that Government guidance[10] is clear that 15m should not be an automatic 'go to' buffer:

> **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**
> - **<u>steeply sloped</u> [*our emphasis*]**

61. In its *'Planners Manual for Ancient and Veteran Trees'* [2019], Woodland Trust says:

> **Although there is no 'one size fits all' with buffer design, each one should be designed to fulfil the specific requirements of its location and the type of proposed development.**
>
> **As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations…**

It also gives examples of two cases where buffers of 50m and 100m respectively were applied in local plans.

62. In *'Impacts of nearby development on the ecology of ancient woodland - addendum* [2012]*'* Woodland Trust includes a chart showing different buffer zones that have been used or recommended. Some of these are as large as 400m: see **Appendix**

[10] *'Ancient woodland, ancient trees and veteran trees; advice for making planning decisions'* Natural England and Forestry Commission [2022])

## APPENDIX A - WHEN TO SURVEY SPECIES[11]

| Species | When to survey (dependent on weather conditions) |
|---|---|
| Badgers (required for impact assessments) | Any time of year<br>February to April or October to November for bait marking surveys to establish territories |
| Bats (preliminary roost assessment) | Any time of year (trees are best surveyed without foliage) |
| Bats (hibernation roosts) | November to mid-March |
| Bats (summer roosts) | May to August |
| Bats (foraging or commuting) | April to October for spring, summer and autumn behaviour |
| Bats (swarming) | August to October |
| Beavers | October to March |
| Birds (breeding) | March to August (species dependent) |
| Birds (winter behaviour) | October to March |
| Birds (migration) | March to May, August to November (dependent on species) |
| Hazel dormice | April to November |
| Great crested newts | Mid-March to mid-June (mid-April to end of June for eDNA) |
| Invertebrates | April to September |
| Natterjack toads | April to May (aquatic survey)<br>July to September (terrestrial survey) |
| Otters | Any time of year |
| Protected plants, fungi and lichens | Spring or summer for vascular plant surveys (depending on species, habitat and location)<br>October to April for bryophyte surveys |
| Reptiles | April to mid-October |
| Water voles | Mid-April to September |
| White-clawed crayfish | July to September |

[11] *'Protected species and development; advice for local planning authorities',* gov.uk, natural England and DEFRA [2025]('click-through' from '*Ancient woodland, ancient trees and veteran trees; advice for making planning decisions'* Natural England and Forestry Commission [2022])

## APPENDIX B - MAP OF SHEPLEY MILL WOOD AND HARTLEY BANK WOOD[12]

The two **Ancient Woodlands** at risk of **deterioration** because of the proposed development are Shepley Mill Wood [*to the east: bottom right on the plan below*] and Hartley Bank Wood [*to the north east: top right on the plan below*]. Stocksmoor is shown at bottom left. The development site directly abuts Shepley Mill Wood:

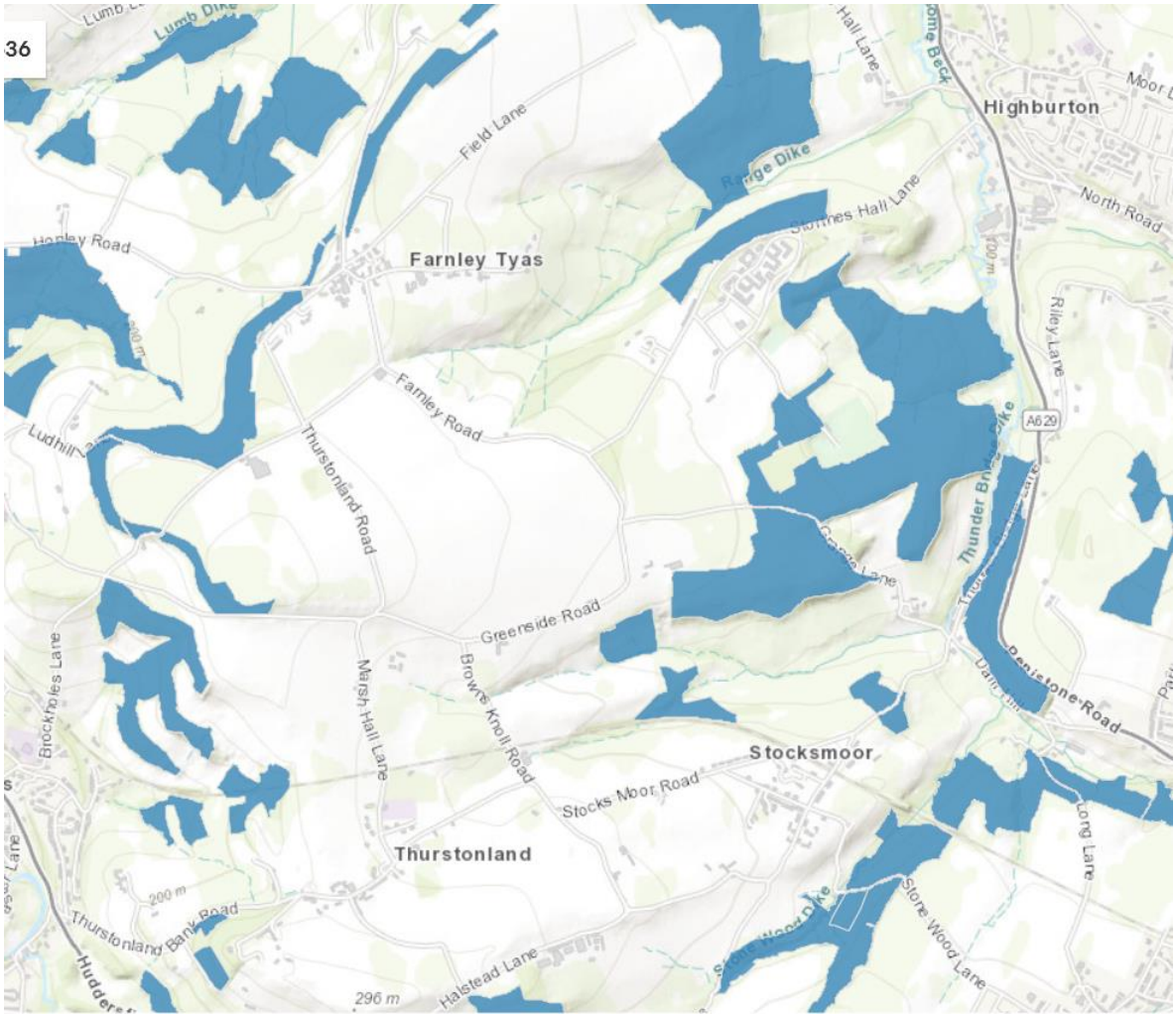



Natural England Open Data Publication - authoritative
There are no public access constraints to this data. Use of this data is subject to the Open Government Licence

[12] Source: Natural England Open Data Publication

# APPENDIX C - MAP SHOWING THE LARGER GROUPING OF WOODLANDS

Shepley Mill Wood and Hartley Bank Wood form part of a larger group of **Ancient Woodlands**[13] that encircle Farnley Tyas (to the north), Thurstonland (to the west) and Stocksmoor (to the East):




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[13] In blue on the map. The **Ancient Woodlands** are Wood End Wood, Shepley Mill Wood, Hartley Bank Wood, Birks Wood, Clough Wood, Browns Knoll Wood, North Spring Wood, Carr Wood, Farnley Bank and Stock Dove Woods, Royd House Wood, Mellor Wood, Arthur Wood, Roaf Wood, Hey Wood, West Wood, Great Plain Wood, Cliff Wood, Black Gutters Wood, Round Wood, Sinking Wood and Halstead Wood.

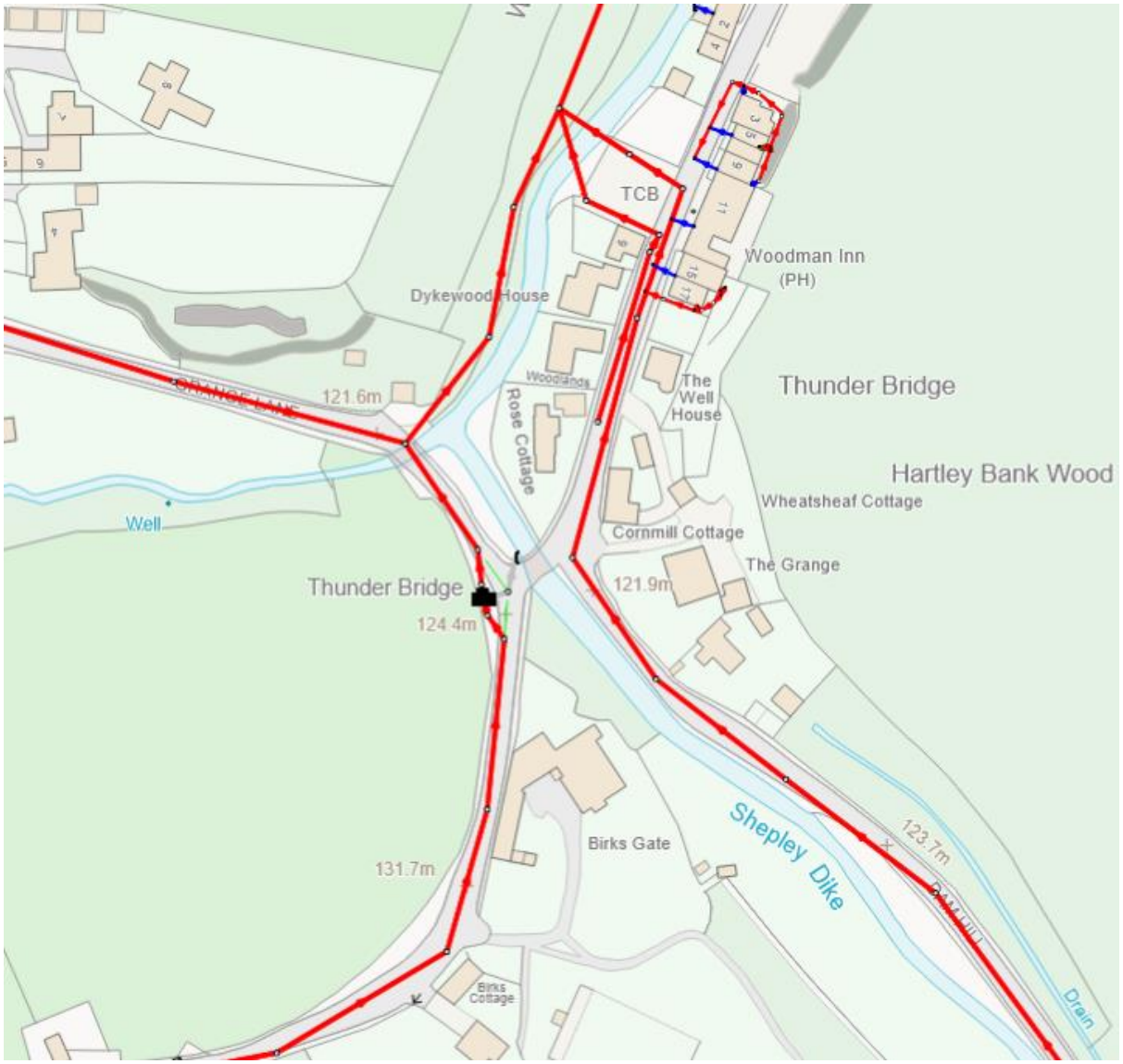
## APPENDIX D - MAP SHOWING DIKE-WOODLAND INTERCONNECTIONS

The map shows the linkages between the Dikes and the way in which those Dikes interconnect with the two **Ancient Woodlands**:




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## APPENDIX E - YORKSHIRE WATER DRAINAGE MAP



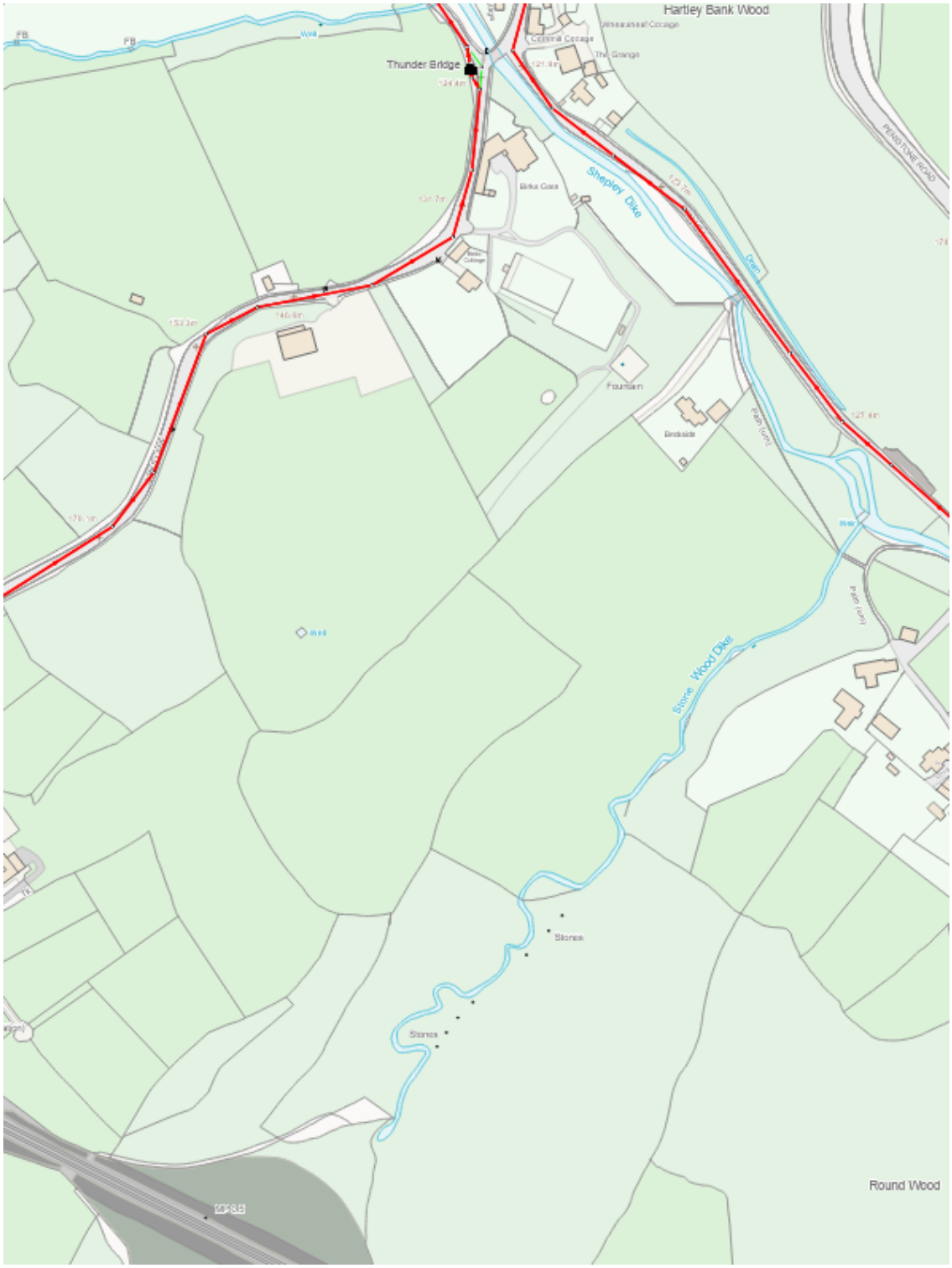

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## APPENDIX F - YORKSHIRE WATER DRAINAGE MAP




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## APPENDIX G - YORKSHIRE WATER DRAINAGE MAP




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# APPENDIX H - EXCERPT CHART FROM WOODLAND TRUST TEXT[14]

**Table 3 Buffer Zones**

| Size of buffer | Reason for buffer | Reference |
|---|---|---|
| 15m (minimum) | To protect woodland from the effects of development such as run-off, noise, damage to tree roots etc. There is no discussion about how the figure of 15m was reached. (UK) | Standing Advice for Ancient Woodland, Natural England, 30 May 2012 (taken from Bolnore Village appeal decision 2007) |
| 50m | To protect woodland from encroachment activities from adjacent housing, such as waste disposal, garden extension. This paper specifies that the buffer should be wooded. (Canada) | McWilliam *et al.* (2010) |
| 100 – 200m | To protect plant species from the effects of vehicle emissions from roads (UK). | Keely *et al.* (2008) |
| 300m | To protect woodland bird species from the effects of roads (Spain). | Palomino and Carrascal (2007) |
| 400m | To protect woodland bird species from the effects of urban development (Spain). | Palomino and Carrascal (2007) |
| ? | Lightly wooded buffer around existing woodland to protect the core from impacts of development (UK) | Merkx *et al.* (2012) |

[14] *'Impacts of nearby development on ancient woodland - addendum',* The Woodland Trust, Luci Ryan [2012]

STATEMENT OF TRUTH

I confirm that the facts and opinions expressed in this Proof of Evidence are true to the best of my knowledge and belief.

Signed: __ _____

Name:
Dated: 27 January 2026