

Yorkshire and North East Area

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Area Director

Mark Child

By email only

Date: 13th March 2026

Dear Sir/Madam,

Ref: 2025/60/93572/E - Outline application with all matters reserved, bar vehicle access into the site, for erection of up to 123 dwellings with associated works including open space, landscaping, drainage infrastructure.

Please find enclosed the Forestry Commission's advice about the impacts that this application may have on the trees and woodland identified in this proposed application. As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather, we are providing information on the potential impact that the proposed development could have on trees and woodland. The Forestry Commission is pleased to provide you with the following information that may be helpful when you consider the application:

- Details of Government policy relating to ancient woodland and ancient & veteran trees
- Information on the importance and designation of ancient woodland and ancient & veteran trees
- Details of Government policy relating to non-ancient woodland and trees

Ancient Woodlands (ASNW/PAWS) and Ancient & Veteran Trees (AVT)

Ancient woodlands, and ancient and veteran trees, are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed, including immensely complex ecological processes and relationships, above and below the ground. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS) and ancient and veteran trees (AVT).

It is Government policy to refuse development that will result in the **loss or deterioration** of irreplaceable habitats including **ancient woodlands and/or ancient and veteran trees**, unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 186c). It is not possible to compensate for the loss of an irreplaceable habitat.

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 \(www.gov.uk\)](https://www.gov.uk/government/consultations/town-and-country-planning-consultation-2024)**

The Application

Although the Forestry Commission was not consulted about this application, it came to the attention of the Yorkshire and North East area team. A Forestry Commission Woodland Officer is familiar with the site and is of the opinion that the 15m buffer proposed for the ancient woodland identified in the application, is not sufficient to prevent deterioration of this irreplaceable habitat. There are also no wholly exceptional reasons in support of the application.

Joint Natural England and Forestry Commission Standing Advice on Ancient Woodland

For more information on the impacts of development on ancient woodland and how to assess these, please see the joint Forestry Commission /Natural England [Standing Advice on Ancient Woodland](#) – “Ancient woodland, ancient trees and veteran trees: advice for making planning decisions”, the supporting [guidance](#) included within it, and [Keepers of Time](#) – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).

The standing advice also provides information on mitigation, including the use of buffers. Proposals in proximity to ancient woodland should have a buffer zone of at least 15m from the boundary of the woodland to avoid root damage. **Where assessment shows other impacts are likely to extend beyond this distance the proposal is likely to require a larger buffer zone.** We would be keen to engage further with the developer in relation to any mitigation and compensation strategies.

In relation to non-ancient woodland and trees, we would like to draw your attention to paragraph 131 of the NPPF which states that planning policies and decisions should ensure that existing trees are retained wherever possible.

Biodiversity Net Gain

Paragraph 186(a) of the NPPF sets out the mitigation hierarchy, stating that where significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, planning permission should be refused. As ancient woodland is an irreplaceable habitat, it cannot be compensated for. Any deterioration of an irreplaceable habitat such as ancient woodland, including ancient woodland soils, would therefore represent a significant harm to biodiversity.

The Biodiversity Gain Hierarchy (Articles 37A and 37D, Town and Country Planning (Development Management Procedure) (England) Order 2015) does not apply to irreplaceable habitats, and the NPPF and Government guidance state that where there is loss of irreplaceable habitat it is impossible to achieve a 10% biodiversity net gain.

Mitigation

It is the Forestry Commission's position that, in-line with Government policy, development should not result in the loss or deterioration of ancient woodland, or ancient or veteran trees, all of which are considered irreplaceable habitats.

Because it is not possible to compensate for the loss or deterioration of ancient woodland, we would support efforts to ensure the protection of the ancient woodland identified in the application. The most effective way to protect ancient woodlands from harm caused by development is to provide buffer zones which ensure that none of the detrimental impacts of

the development, extend to the woodland. Please refer to the Natural England and Forestry Commission standing advice for more information about buffer zones.

We hope these comments are helpful to you. We look forward to hearing from you with regards to any future planning applications for this site. If you have any further queries or would like a follow up meeting to discuss this planning application, please do not hesitate to contact the Forestry Commission on the email address provided above.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Dan Brown', written in a cursive style.

Dan Brown, Local Partnership Advisor
Yorkshire and North East Team