

## Development Management

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**Subject:** FW: FAO Jonathan Haine - Woodland Trust comments on application LCC/2021/0012

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**From:** Jack Taylor [REDACTED]  
**Sent:** Thursday, February 15, 2024 7:17 PM  
**To:** Haine, Jonathan [REDACTED]  
**Cc:** [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)  
**Subject:** RE: FAO Jonathan Haine - Woodland Trust comments on application LCC/2021/0012

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Dear Jonathan,

Many thanks for allowing the Trust an extended period for comments on application LCC/2021/0012.

Following an assessment of the proposals, the Trust holds an **objection** to this proposal on account of potential for deterioration of ancient woodland. While the quarry extraction area appears to be a sufficient distance from the nearest area of ancient woodland, the associated access road appears to run alongside an area of ancient woodland known as Samlesbury Wood (grid ref: SD 59428 30456). This wood is designated as an area of ancient semi-natural woodland on Natural England's Ancient Woodland Inventory (AWI).

The National Planning Policy Framework, paragraph 186, 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 reasons<sup>67</sup> and a suitable compensation strategy exists;*".

It is not clear how close the access road is to the ancient woodland, however, locating new development close to ancient woodland could have significant impacts resulting in deterioration. While the applicants do reference ancient woodland, they do not acknowledge any potential impacts. A haul road / access road associated with a quarry development could also result in indirect impacts in the form of disturbance (noise and light) and pollution (dust, traffic emissions and air). Dust is a substantial by-product of both construction and operational activities associated with quarrying and can have deleterious impacts on ancient woodland, affecting flora particularly but with knock-on impacts throughout a woodland ecosystem. Noise and light associated with quarry traffic can also negatively impact on ancient woodland, affecting faunal species, particularly those species active during dawn and dusk, and twilight or nocturnal species, such as moths, bats, and certain species of birds.

It does not appear that the applicant has considered these potential impacts by either addressing these within the Environmental Statement or applying any form of mitigation measure that would act to limit impacts on the ancient woodland. One of the main forms of mitigation for reducing impact would be the implementation of a buffer zone between the ancient woodland and development to establish distance that helps to alleviate harmful impacts whilst also creating new areas of habitat.

Without a full assessment of impacts of the haul road on the ancient woodland, a precautionary approach should be taken through the establishment of a buffer zone of 50 metres to prevent adverse impacts such as pollution and disturbance. This is in line with Natural England and Forestry Commission's [standing advice](#) which states that "*the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.*" Therefore, a 50m buffer would be appropriate in this instance, unless the applicant is able to demonstrate that a smaller buffer would suffice.

Additionally, HERAS fencing fitted with acoustic and dust screening measures, should be utilised during construction to ensure the ancient woodland is protected from encroachment of construction activity and to limit the effects of indirect effects during construction.

We would expect to see further information provided by the applicant to ensure that there would be no deterioration of ancient woodland associated with the proposals. At this present moment, we consider that the proposals could result in adverse impact to Samlesbury Wood and are therefore in contravention of national planning policy, para 186. Until it can be demonstrated that the ancient woodland would not be subject to deterioration, the Trust will hold an **objection** to this application.

We hope you find our comments to be of use to you. Please do not hesitate to contact us if you would like to discuss our comments further.

Best regards,  
Jack

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