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Staffordshire Moorlands District Council  
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12<sup>th</sup> July 2016

Dear Ms Curley

**Planning application: SMD/2016/0378**

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own and manage over 1,000 sites covering around 24,000 hectares (59,000 acres) and have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost.

The Woodland Trust **objects** to the planning application on the basis of loss and damage to Frame Wood (grid ref: SK047454), a Plantation on Ancient Woodland, designated as such on Natural England's Ancient Woodland Inventory (AWI).

National Planning Policy Framework paragraph 118 states that "planning permission should be refused for development resulting in the **loss or deterioration of irreplaceable habitats**, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

The recently published (April 2014) Natural England Standing Advice for Ancient Woodland and Veteran Trees, paragraph 4.8.1 states: 'Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodland:

- Is exceptionally rich in wildlife, and supports many rare and threatened species;
- May contain surviving descendants and features from the original natural forests;
- Acts as reservoirs from which wildlife can spread into new woodlands;

- Has valuable soils due to their undisturbed nature;
- Is an integral part of England's historic landscapes and the biological and visual functioning of a landscape;
- Contains a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance;
- Contributes to people's sense of place and imagination.'

Within the Environmental Impact Assessment Chapter 9: Ecology it states:

"9.186 One area of Ancient Woodland (Frame Wood) is present within the proposed application site. This designation is restricted to an area of re-planted ancient woodland within the central section of the woodland. Direct impacts to this woodland will occur as a result of the provision of shared pedestrian/cycle routes which will be approximately 1.8–3.5 m in width. This woodland is not subject to any management and as a consequence has a dense ground layer dominated by bramble. The main impacts during construction will be potential impacts upon the root systems of trees, removal of trees/saplings for access and impacts to the sensitive ground flora. Due to the significant value of this habitat, these impacts are considered to have a moderate adverse impact."

The proposed pathways within the ancient woodland will cause direct loss to the ancient woodland due to disturbance to the soil, which is one of the main features of ancient woodland.

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. The Woodland Trust **objects** to this proposal due to the direct loss of this irreplaceable habitat.

If you would like clarification of any of the points raised please contact us via [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)

Yours sincerely,

Katharine Rist

Campaigner- Ancient Woodland