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4th December 2024

Dear Stephanie Bryant

Reference: DC/24/1289
Proposal: Proposed construction, operation and maintenance of a Battery Storage Energy System (BESS) with associated Infrastructure and works including highway access, landscaping and bio-diversity enhancements | Land To The South of Hartsgravel Wood Shipley Road Southwater West Sussex

Thank you for re-consulting the Woodland Trust on this application.

We have reviewed the applicant's comments with regards to the points raised in our original holding objection dated 10th October 2024 and can confirm that we will be **maintaining an objection** to this application.

In our original comment we made a number of points in relation to ensuring appropriate protection for ancient or veteran trees. For convenience these are summarised below:-

1. The LVIA states that there are veteran trees on site, some of which are becoming stag-headed.
2. The LVIA points to the presence of "*remnant linear groups of former hedge oak trees*" and it is apparent that these linear strips of woodland/hedge boundaries within the site show on the first edition county series maps published between 1843 and 1893 (Epoch 1).
3. The AIA states that *"where significant niche habitat potential was present such as deadwood, hollowing of stems, cracks and fissures etc. …. These trees would usually be the subject of further ecological evaluation."*

We were not able to identify the "*further ecological evaluation*" and therefore recommended that further assessment is undertaken to identify ancient or veteran trees on site and to demonstrate that appropriate veteran tree buffers have been provided in line with Natural England and the Forestry Commission's standing advice.

It appears that the applicant's response to our comments is as follows: "*The Woodland Trust have queried if there are any veteran trees with the site. The project Arboriculturist has confirmed that there are no veteran trees within the site. Mention of veteran trees within the*

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LVIA is due to the use of language rather than designation". We have not been able to find any further discussion or meaningful assessment beyond this brief response.

With regards to these two points, we would comment as follows:-

The project Arboriculturist has confirmed that there are no veteran trees within the site
We are concerned that there is no supporting information with which to underpin this statement. Where a tree is stag-headed this is either a sign that the tree is veteran or a sign that the tree is diseased. Even if the trees do not have a particularly large girth, if they are stag-headed this is a clear indicator of likely veteran status. **The applicant should provide information to show which trees have been assessed, to link the veteran and stag-headed trees identified in the LVIA with trees described in the Tree Survey, and to explain the methodology for assessing veteran status, including the application of key criteria used and whether girth has been used as a disqualifier.**

Mention of veteran trees within the LVIA is due to the use of language rather than designation
We do not understand this point. There is no comprehensive national register of ancient and veteran trees – the term 'veteran' is not a designation in the same way that, for example, the term 'ancient woodland' is a designation. The Woodland Trust's Ancient Tree Inventory categorises trees as veteran based on an assessment of criteria such as veteran characteristics, context, position in the landscape etc, but the lack of inclusion in the ATI does not mean that a tree is not veteran. To describe a tree as veteran is using language to summarise that the tree has developed unique features (such as hollowing of stems, cracks, fissures and deadwood) that provide such a rich and diverse range of habitats that the trees have become disproportionately valuable parts of our natural environment.

We hope these comments are useful and help to explain why the application, as it stands, has not demonstrated compliance with NPPF paragraph 186.

Kind regards

Cathy Johannesen
Programme Officer - Woods Under Threat