

Mr S. Kilmartin,
Planning Department,
Ribble Valley Borough Council,
Church Walk,
Clitheroe.

24 September 2022.

Re Planning Application 3/2022/0574

Dear Sir,

[REDACTED] been sent notice of the above application for comment. On studying the relevant information on the Ribble Valley Borough Council website, our comments are noted below.

For the reasons mentioned by Mellor Parish Council, we fully support their position regarding the risks posed by:-

- the planned storage of highly flammable substances (the application specifically mentions, but is assumed to be not limited to, petrol and weedkiller) in the shipping containers currently found on that site.
- heavy plant and machinery, especially when delivered by huge articulated commercial vehicles completely unsuitable for the narrow lanes leading to the site, blocking essential road access. Note, additionally, there are a number of bridges across water courses along the lanes leading to the site, including one immediately east of the site entrance, that could sustain significant damage due to the considerable combined weight of such vehicles and plant).

In addition, the following observations are provided for your consideration. Many of these observations will obviously touch on areas that surely will be fully covered by your Tree Preservation Officers. But hopefully, observations from [REDACTED] of protected woodland such as ourselves will be of use to the applicants to show protected woodland ownership is not quite as intense and demanding as they appear to have been led to believe.

The application points out several times that the applicants wish to preserve or even increase biodiversity at the site. However, various actions they plan to take to achieve that aim would appear to be counter productive, and mostly of relevance to establishing a new woodland, not dealing with an established, albeit young, woodland.

For example...

- With their clear and oft stated aim of preserving the woodland's diversity of flora and fauna, how can the planned use of weedkiller be anything other than counterproductive to that aim?! In a garden a weed is said to be a wild flower in the wrong place, but in a woodland, Himalayan Balsam aside (of which, more later), how can there be a wrong place?! Even Bramble and Nettle have their place in assisting biodiversity, as anyone who knows even a little about the topic of biodiversity will attest.

- Regarding the proposal to carry out leaf collecting, given that rotting leaves return nutrients to the soil and additionally provide habit and food for countless species of mice, voles, insects, fungi, bacteria and other soil enhancing species, something essential for healthy trees, the widespread collection of leaves would surely be highly counterproductive to their aims, especially given the inevitable and extensive unintentional disturbance that such an activity would promote.
- Trees adapt to natural conditions so should not need watering once established, especially as it encourages roots to grow up towards the soil surface rather than down towards groundwater. So surely the stated need for ring-sprays actually applies more to establishing a woodland after planting, and possibly a commercial woodland at that?
- Keeping a tree clear of weeds and grass for the first few years after planting obviously reduces competition for moisture and nutrients. But in a now well established wild woodland is it needed? Again, maybe in a commercial woodland, but surely not a wild woodland?
- Keeping deer out of the area is also counter to the proposal to encourage wildlife. Whilst deer are obviously a problem for saplings, mature trees are surely not threatened to any great extent by deer. [REDACTED] have had deer in [REDACTED] garden for years (although rarely in recent years), and yes, you can get the occasional deer that will rub their antlers on the trunk and remove some bark, but we have plenty of evidence that such behaviour does no real harm to the tree concerned, and plenty of saplings that have developed into well established, healthy trees. And surely, the sight of these magnificent creatures is one of the best you can get in a UK woodland, so why would you want to keep them away? Another commercial woodland issue and not relevant to a mature wild woodland?

Has a biodiversity consultant been sought to support or counter the various proposals in the application and discussed above? It would appear not.

Surprisingly, given the small size of the woodland, the planning application refers to the need for a welfare unit with decontamination facilities (see next paragraph) and toilets, hot water, etc [REDACTED] the application makes no reference to how the utilities required by such a unit (i.e. electricity, water, drainage including sewerage) would be provided. Surely any or all of those utilities would require further loss of protected trees and/or damage to their root systems already damaged by the unauthorised work carried out on the site to date.

As an aside, the need for decontamination facilities ('if required by risk assessment' – see email from [REDACTED] brings into question just what horrendous hazardous chemicals might be used on this site so close to residential properties? The considerations relevant to the use of weedkiller discussed previously apply to any such chemicals – they surely have no place in a woodland within which the owners state they wish to promote biodiversity!

The need for a welfare unit is predicated by the applicants' declared proposal to carry out extensive woodland maintenance activities, some of which are discussed above. Given that the trees are protected, this is another surprising statement. Clearly, the issues associated with Ash die-back need addressing, along with the extensive HB infestation (we whole heartedly agree to the need for this extremely invasive biodiversity-sapping plant to be eliminated from the site – and everywhere else for that matter!). But the 40+ recently inspected, healthy mature protected trees in [REDACTED]

(obviously just a small percentage of the number contained within the Raan woodland, but nonetheless, indicative of maintenance requirements) have required very little in the way of 'regular maintenance' in the significant number of years [REDACTED] and most of that has been associated with keeping the canopy above areas used by people and away from buildings and highways, none of which appear relevant to this application.

Given this is protected woodland, your website notes that all tree work must be carried out in accordance with British Standard 3998 for tree work and carried out by a fully qualified and insured arboricultural contractor. Such contractors will surely have their own established ways of dealing with welfare matters. Furthermore, it is difficult to believe that such contractors would use anything other than their own equipment. Both would impact the need for on-site storage and/or a welfare unit.

[REDACTED] overhead power supply has been kept free of obstruction over the years by United Utilities. Surely the same approach applies to the power lines crossing the Raan woodland, with a consequent reduction in the cumulative maintenance man-hours needed to be expended by the new owners and a further concomitant reduction in the planned infrastructure?

The need for access for vehicles in the event of a woodland fire is mentioned. Given that statistics show that most fires are caused by people, and the general public are not allowed in the wood, the biggest risk would appear to be due to people being present to carry out the huge and extensive maintenance planned. A more realistic maintenance regime would clearly reduce the risks by reducing human presence.

In conclusion...

[REDACTED] fully support the position of Mellor Parish Council regarding the risks posed by:-

- the planned storage of highly flammable substances on the site in question
- heavy plant and machinery attending the site.

Overall, the impact of all the planned and extensive tree maintenance must surely be counterproductive to applicants' stated aim of promoting biodiversity. Natural development rather than some preconceived human view of how to create biodiversity must surely hold sway.

And a much reduced maintenance plan would surely eliminate both the need for the storage areas to remain and a welfare unit to be established, especially as the latter would more than likely come at the cost of further damage to already damaged protected woodland.

Finally, with no need for on-site storage or welfare, the damaged area of the Raan woodland could be restored to its earlier condition.

Yours faithfully,

[REDACTED]