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**From:** Justin Milward  
**Sent:** 10 April 2015 15:52  
**To:** DPD  
**Subject:** Local Plan Review consultation  
**Attachments:** 1542 (jagm) Mid Devon DC Local Plan REview 270415.doc

Dear Sirs

Please find attached the Woodland Trust's response to the above consultation. If you have any queries, please do not hesitate to contact me.

Yours sincerely,

**Justin Milward)**  
Lead Government Affairs Officer - Local



The Woodland Trust  
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<http://www.woodlandtrust.org.uk>

**Mid Devon District Council – Local Plan Review**  
**2013- 2033 – Proposed Submission**  
**Feb 2015**

**Woodland Trust response**



**Policy S5 - Public open space**

**We are objecting to this policy because it still does not include a reference to accessible woodland.**

In addition, paragraph 4.89 of this Local Plan Submission document states that **Policy DM26 - Green infrastructure in major development**, which specifically supports woodland creation, should be considered alongside this Policy S5. For the two policies to cross reference, accessible woodland should therefore be included in any policy on public open space.

In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. At the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities.

Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.

Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.

This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry –

- **Health:** *"Access to green spaces is associated with better mental and physical health across socioeconomic groups.....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities." **Healthy Lives, Healthy People** (Government White Paper, November 2010, paras 3.36-37).*
- **Planning:** *"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision." **National Planning Policy Framework** (DCLG, March 2012, para 73).*

- **Forestry:** *"Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits....The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone's health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities".* **Government Forestry Policy Statement (Defra, January 2013, p.16).**

The Woodland Trust believes that trees and woods can deliver a wide range of benefits for placemaking for local communities, in both a rural and urban settings, and this is strongly supported by current national planning policy (as discussed in our comments on 'Our Heritage & Our Environment'. The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits.

Our publication ***Woodland Creation – why it matters***

<http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodandCreationbro.pdf> was brought to your attention with our response to your DDC SPD consultation, as was the Woodland Access Standard, where access to woodland is a key issue linking the environment with health and other social and economic issues that can benefit from green infrastructure provision.

Access to woodland is a key issue linking the environment with health and other social and economic issues that can benefit from green infrastructure provision. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering community services and facilities for improving peoples' quality of life and be taken into account as a principle and with the operation of development contributions which can also support a Core Strategy in a Local Plan with delivery and development contributions.

The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size
- that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.

Research by the Woodland Trust shows that less than 17% of the population of England has access to local woodland within 500m of their home. In Mid Devon DC this figure is significantly lower at 2.4%. Providing more accessible trees, woods and green space can therefore provide a critical link to healthier lives in Mid Devon and, consequently, to saving money. Our accessible woodland data is available via our *Space for People* publication is available on request.

**We would like to see accessible woodland, using the Woodland Access Standard (above), included in Policy S5.**

**Policy DM26 - Green infrastructure in major development**

**We support this policy, particularly the reference to new green infrastructure incorporating the creation of new native woodland. We would like this policy**

**enhanced within a dedicated Trees & Woodland SPD, setting out the full range of benefits that woodland can deliver.**

This complies with national policy as evidenced by the **Government Forestry Policy Statement** (Defra Jan 2013) which states: *'We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity.'*

**Policy DM28 - Other protected sites**

**We appreciate the efforts made in this policy to protect ancient woodland and ancient trees but we are objecting because recent policy evolution suggests that this protection should be absolute, without any caveat.**

It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna.

With Mid Devon DC showing a below average ancient woodland resource at 2.1% of land area compared to a UK average of 2.5%, it is critical that this valuable natural resource is absolutely protected in the Local Plan.

Emerging national policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The **Communities and Local Government (CLG) Select Committee** published its report following its June 2014 inquiry into the '**Operation of the National Planning Policy Framework (NPPF)**', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16<sup>th</sup> Dec 2014). The **CLG Select Committee report** states: *'We agree that ancient woodland should be protected by the planning system. Woodland that is over 400 years old cannot be replaced and should be awarded the same level of protection as our built heritage. We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be "wholly exceptional". We further recommend that the Government initiate work with Natural England and the Woodland Trust to establish whether more ancient woodland could be designated as sites of special scientific interest and to consider what the barriers to designation might be.'*

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf>.

This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended, there is a clear role for Local Plans and associated documents to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.

This recommendation should also be considered in conjunction with other - stronger - national policies on ancient woodland -

- The Government's policy document '**Keepers of Time – A statement of Policy for England's Ancient & Native Woodland**' (Defra/Forestry Commission, 2005, p.10) states: *'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'*.
- The Government's **Independent Panel on Forestry** states: *'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time – A statement of policy for England's ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.'* (Defra, Final Report, July 2012). This has been endorsed by the response in the **Government Forestry Policy Statement** (Defra Jan 2013): *'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'*.
- The Government's Natural Environment White Paper – **The Natural Choice: securing the value of nature** (HM Government, July 2011, para 2.56) states that: *'The Government is committed to providing appropriate protection to ancient woodlands....'*
- The **Biodiversity Strategy for England** (*Biodiversity 2020: A Strategy for England's Wildlife & Ecosystem Services*, Defra 2011, see 'Forestry' para 2.16) states that – *'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'*.

There is increasing evidence of other local authorities supporting absolute protection of ancient woodland in their LDF planning documents -

**North Somerset Council Core Strategy Adopted April 2012 –**

**'Policy CS4: Nature conservation**

*North Somerset contains outstanding wildlife habitats and species. These include limestone grasslands, traditional orchards, wetlands, rhynes, commons, hedgerows, ancient woodlands and the Severn Estuary. Key species include rare horseshoe bats, otters, wildfowl and wading birds, slow-worms and water voles.*

*The biodiversity of North Somerset will be maintained and enhanced by:...*

*3) seeking to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees'*

**The Plan for Stafford Borough** - Pre-submission publication: Jan 2013 states in Policy N5 that: *'New developments will be required to include appropriate tree planting, to retain and integrate healthy, mature trees and hedgerows, and replace any trees that need to be removed. Development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows'*.

**The Bristol City Council - Site Allocations and Development Management Policies** (Adopted July 2014) [part of Local Plan) states that

Policy DM17: Development Involving Existing Green Infrastructure

*"Trees*

*All new development should integrate important existing trees. Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted"*.

**In order to conform with national planning policy and local plan evidence, we would therefore like to see an additional sentence added to Policy DM28 reading: "Development which would result in the loss of Ancient Woodland or Ancient trees will not be permitted". We would like this policy enhanced within a dedicated Trees & Woodland SPD.**

For further information please contact:

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