

6207/S11/MOD

6207/C07-CV22/MOD

6207/DM28/MOD

6207/CV1-CV6/MOD

6207/DM26/MOD

6207/C1/19/MOD

From: Local Plan Review
Subject: FW: Woodland Trust Consultation Response
Attachments: Mid Devon Local Plan review.docx

6207/S12/MOD

6207/CB1/MOD

6207/W11

From: Catherine Brabner-Evans
Sent: 10 February 2017 10:08
To: Local Plan Review
Subject: Woodland Trust Consultation Response

Dear Planning Team,

Please find attached a submission from the Woodland Trust on your Local Plan Review Consultation.

Kind regards,

Catherine

Catherine Brabner-Evans
Regional External Affairs Officer - South West

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WOODLAND TRUST

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Woodland Trust Submission Mid – Devon Local Plan Review Consultation

As the UK's leading woodland conservation charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future. We manage over 1,250 sites, including over 200 sites in the South West, and have 500,000 members and supporters.

We welcome the opportunity to comment on the Mid Devon Local Plan review consultation.

We note with concern that the updated plan includes increased housing numbers, both in terms of units and delivery rates. There will need to be increased protections for trees and hedgerows as well as extensive green infrastructure provision to help mitigate the impacts of new development on the environment.

We therefore strongly support commitment to deliver green infrastructure has been added in **Policy S11(g)** with reference to the extension of Cullompton. The Woodland Trust believes that trees and woodland are an essential element of place making as they can deliver such a wide range of benefits. These include for recreation and amenity, health and wellbeing, water quality and flooding, air quality as well as for wildlife and landscape - see our publication *Residential Development and Trees* .

Further, we strongly support the commitments made in **Policy CU3** to environmental protection and green infrastructure to be provided and funded by all new development within the site and that there will be extensive tree planting, as well as a commitment to protect and enhance trees and hedgerows to maintain wildlife networks.

We strongly welcome the inclusion in **paragraphs 3.81 and 3.107** of recognition of the role of tree planting in flood prevention and carbon reduction. However, we feel the wording here could be more directive, rather than just requiring 'recognition', actually requiring this to be acted upon and an extensive programme of tree planting to be a planning requirement.

In **Policies CU5 and CU11** we welcome the additional wording requiring tree planting off site only when it cannot be accommodated onsite. The Woodland Trust would advocate that onsite planting is usually the preferable outcome.

We note with concern that there is a potential risk of a new road through Cullompton conservation area (**para 3.143a**) should such a recommendation arise the Woodland Trust would wish to be consulted on the potential impacts for woods and trees.

We welcome the tightening of the requirements for Green Infrastructure phasing in **Policy CU6**, the provision of a landscape buffer including replacement hedgerows in **CB1** and commitments to mitigate wildlife impact including the protection of hedgerows and provision of green infrastructure in **SP2**.

The Woodland Trust has already made an objection to the development proposal adjacent to a Woodland Trust owned site at Meadow Park, outlined in **Policy WI1**. I attach the letter herewith for your reference. In Summary, the Trust objects to the current proposed developments until our concerns are fully addressed. This includes an adequate buffer zone of 15m between the development and our site and an agreement on site access to ensure that any potential damage to our site of the three veteran/notable trees will be alleviated entirely.

Therefore, **paragraph c) of Policy WI1** should be amended to read: Mitigation of any wildlife impact, including protection of three adjacent veteran/notable trees on the development site boundary with the Woodland Trust's adjoining Meadow Park Wood – and the wood itself – by way of a tree planting buffer zone between residential curtilages and the wood boundary of at least 15 metres. Also appropriate management of increased visitor usage of Meadow Park Wood resulting from the development will be put in place.

We are extremely concerned about the caveat that has been added to **Policy DM26** that the council may seek offsite contributions for green infrastructure. We are concerned that this may weaken the councils' ability to ensure that GI is provided where it is most needed.

We strongly welcome the additional wording in **paragraph 4.94** which recognises the potential environmental impact of major developments 'adjoining' protected landscapes or National Parks. At the Woodland Trust we would stand against major developments adjoining woodlands, particularly ancient woodlands, because of the proven negative impacts on these environments.

In **Policy DM28** we are concerned that the additional wording at c) weakens the commitment to mitigating the impacts of development and offers the opportunity to provide compensation instead. The Woodland Trust reiterates that Ancient Woodland is not replaceable and therefore its loss cannot be compensated for financially or through new tree planting.

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.

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.

Approximately one quarter of priority UK Biodiversity Action Plan species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

Para 118 of the National Planning Policy Framework 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.*" Following publication of the Housing White Paper, ancient woodland will soon benefit from the same protections as green belt land.

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.

The Woodland Trust would therefore recommend that the following wording be used in **Policy DM28: Development which would result in the loss of Ancient Woodland or Ancient trees will not be permitted other than in wholly exceptional circumstances.**

If you have any queries, please do not hesitate to get in touch via this email address

[REDACTED]

Yours sincerely,

Catherine Brabner-Evans

Catherine Brabner-Evans

South West External Affairs Officer

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