

Woodland Trust Submission Stroud Local Plan – Consultation Response

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 Stroud Local Plan Issues and Options Consultation. The Woodland Trust strongly welcomes the recognition in section 1.3 of the environment as a key issue for the emerging Local Plan. In particular we support the decision to prioritise the following issues: **19. To conserve and enhance the countryside, landscape and biodiversity, including maximising potential for green infrastructure delivery; 20. Mitigating the impacts of climate change; 25. Promoting natural flood management projects; 26. Strategies to avoid, reduce and mitigate impacts of development on the natural environment and; 32. Providing a network of public open space to increase accessibility.**

We believe that many of these issues can be tackled in part by ensuring adequate protection of ancient woodland, ancient and veteran trees, and by woodland creation and tree planting. Overall, within the vision and objectives of the plan, we would welcome a specific reference to maintaining and enhancing the tree canopy in the area. Given the level of proposed growth, high quality green infrastructure design will be required in order to maintain biodiversity and connectivity and to mitigate the impacts of development.

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. Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits: - These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).

Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat climate change effects. In particular, we would like to see ancient woodland and ancient or veteran trees given the strongest possible level of protection in your local plan. Ideally we would like to see a statement that these assets, being irreplaceable, should be protected in all but the most wholly exceptional circumstances. Protection of irreplaceable ancient and semi-natural woodland, restoration of degraded ancient woodland together, plus the addition of new and diverse woodland creation to buffer and extend our depleted and fragmented habitats can all significantly help resilience.

The **National Planning Policy Framework** (NPPF) supports the need for more habitat creation by stating that: *'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*, (DCLG, March 2012, para 114). Also para 117 states that: *'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re- creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'*.

The **England Biodiversity Strategy** makes it clear that expansion of priority habitats like native woodland remains a key aim - *'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England'*, (*Biodiversity 2020: A strategy for England's wildlife and ecosystems services*, DEFRA 2011, p.26).

A reading of these two policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for Stroud's Local Plan.

The levels of development proposed for the area create parallel opportunities for environmental growth, and it is essential that a range of green infrastructure should be prioritised at the outset including clear targets to increase tree canopy cover across the plan area. The Woodland Trust would like to see a strong commitment here to the expectations on developers to provide trees as part of a new development or of any regeneration scheme. Our guide to [residential developments and trees](#) may help to provide a framework.

The Woodland Trust recommends that our **Woodland Access Standard be adopted here as a measure of success**. This standard aims to ensure everyone has reasonable access to woodland – as encapsulated in our [Space for People](#) publication.

The Woodland Trust's Woodland Access Standard aspires that:

- No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size; and
- 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

Woods make particularly outstanding green spaces for public access because of the experience of nature they provide, their visual prominence alongside buildings which offers balance between the built and natural worlds, their low maintenance costs and their ability to accommodate large numbers of visitors.

Woodland and related activities can also be valuable in promoting social inclusion. Woodland activities, such as tree planting, walking and woodland crafts, can provide a forum for people of all ages and cultural backgrounds to come together to learn about and improve their local environment.

The extensive links 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).

A recent report from Natural England highlights recent good practise in social prescribing for mental health, in particular the role of nature-based interventions (Natural England, 2017). It demonstrates the benefits of green prescriptions for mental health, wellbeing and the NHS budget. The report cites a study of social prescriptions for woodland health promotion activities for those with mental health problems in Scotland, which ranked as a 'highly cost effective' intervention for health by NICE benchmarks (Willis et al., 2016; Buck, 2016).

Finally on flooding, Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including:

- Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off.
- Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act as a drag on flood waters, slowing down floods and increasing water storage.
- Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging.
- The greater water use of trees can reduce the volume of flood water at source.
- Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% of rainfall.

A joint Environment Agency/Forestry Commission publication **Woodland for Water: Woodland measures for meeting Water Framework objectives** states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives' (Environment Agency, July 2011- <http://www.forestry.gov.uk/fr/woodlandforwater>).

Planting a range of native trees increases the resilience of the landscape to climate change impacts. In addition to water management, trees can combat the effects of urban heat island and have a role in improving air quality.

Good recent examples of Local Plan policies on Trees and Woods are provided by;

Ipswich Borough Council Local Plan (adopted) DM10 Trees Policy

The Council will protect and ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity by:

- a. making Tree Preservation Orders;*
 - b. in relation to applications for works to trees, only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided;*
 - c. adhering to the principles of BS3998 'Tree work – Recommendations' 2010 for established tree management options (including soil care and tree felling);*
 - d. refusing planning permission for development resulting in the loss or deterioration 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; and*
 - e. encouraging tree planting to help achieve a target of 22% canopy cover by 2050. Applications for development should retain existing trees and hedgerows of amenity or biodiversity value where possible. Where development affecting trees or hedgerows is proposed, the application must be accompanied by:*
 - f. an accurate survey and assessment of all existing trees and hedgerows on site in accordance with BS5837 'Trees in relation to design, demolition and construction – Recommendations' 2012 by a competent arborist; and*
 - g. details of protective measures to be put in place during the development process to ensure the health and safety of each specimen and hedgerow to be retained; and*
 - h. where removal of a mature tree is proposed, a plan for replacement planting on a two for one basis and using semi-mature specimens, unless otherwise agreed by the Council.*
- Design in new development should have proper regard to the setting of protected trees. Landscaping and tree planting should be integrated into new development.*

**Taunton Deane Site Allocations and Development Management Plan - Adopted Dec 2016
Policy ENV1: Protection of trees, woodland, orchards and hedgerows**

Development should seek to minimise impact on trees, woodlands, orchards, historic parklands and hedgerows of value to the areas landscape, character or wildlife and seek to provide net gain where possible. Where the loss is unavoidable, the works (or development) should be timed to avoid disturbance to species that are protected by law. Adequate provision must be made to compensate for this loss. Development which would result in the loss of Ancient Woodland, Aged or Veteran Trees will not be permitted. The proper management of this resource for nature conservation purposes will be sought.

East Hants DC Local Plan: Joint Core Strategy (adopted June 2014) -

CP21 Biodiversity

New development will be required to: b) extend specific protection to, and encourage enhancement of, other sites and features which are of local value for wildlife, for example important trees, rivers, river corridors and hedgerows, but which are not included in designated sites."

Solihull Local Plan (adopted Dec 2013) -

"Policy P14 Amenity

Safeguard important trees, hedgerows and woodlands, encourage new and replacement tree and hedgerow planting and identify areas that may be suitable for the creation of new woodland".

Finally on the proposed site allocations for development we note that Site ref NEW002 Adjacent Tintock Woods (10.72 Ha PAWS) grid ref SO686002 could pose a threat to ancient woodland. We would refer you to the updated Natural England Standing Advice <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> and recommend a 50 metre buffer to protect the irreplaceable ancient woodland should a decision be taken to develop this site.

We hope you will take these comments into consideration as part of the consultation process and that the examples and document references contained herewith are useful for policy development. If you have any queries, please do not hesitate to get in touch via this email address governmentaffairs@woodlandtrust.org.uk

Yours sincerely,



South West External Affairs Officer

