

Woodland Trust Response Stroud District – Local Plan Review – Draft Plan

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 1,000 sites, including over 200 across the South West, and have 500,000 members and supporters.

Thank you for the opportunity to comment on Stroud's Draft Local Plan.

The Woodland Trust believes that trees and woodland play a crucial role in placemaking, given their value to health and wellbeing, recreation, air and water quality, wildlife, flood protection, climate adaptation and resilience, and amenity value. Given the scale of projected development in Stroud District across the plan period, it is important to ensure trees and woodland – as part of a wider approach to strategic green infrastructure – are protected and their planting also planning for from the earliest stage of the planning process to maximise these benefits.

PRIORITY ISSUES

We strongly welcome that the Draft Local Plan identifies climate change as an overarching priority issue, in line with the climate emergency declaration. We welcome the focus on adaptation and resilience as well as decarbonisation (20).

We strongly welcome the priority to create a green infrastructure network (19), which if well-planned will contribute to the other priority issues, and the emphasis on the mitigation hierarchy – to first avoid impact. In the context of the climate emergency, we highlight the role of green infrastructure in not only drawing down carbon (particularly in the case of trees) but also building resilience to the impacts of a changing climate.

We suggest an additional focus under 'Economy' (p15) as '*Promote a natural capital approach to help businesses build resilience to the impacts of climate change*'.

We welcome the identified issues under 'Environment' (p17). In addition to the abovementioned priority issues (19 and 20), we welcome issue 25, '*Providing resilience to flood risk, releasing regeneration sites from the floodplain for housing and employment, and promoting natural flood management projects*.' We highlight that this ambition is much interrelated with both the GI network (19) and building resilience (20).

We also welcome 32. '*Developing a Green Infrastructure network of public open space provision throughout the District, to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating multiple uses*'. This makes clear the role of a healthy, well-connected natural environment in supporting the health and wellbeing of people and communities.

We welcome issues 35 and 40 which make clear the role of cross-sectoral, integrated planning and funding to deliver on environmental ambitions.

VISION TO 2040

We welcome that a healthy natural environment is central to this vision. We suggest amending 'We have responded to climate change' to 'We are continuing to proactively respond to climate change' to reflect the ongoing nature, and increasing impacts of, climate change. Projections indicate that global temperatures will have likely reached 2C warmer by 2040, with greater spikes in local weather (per UK Climate Projections). The change that this will bring could be better reflected in this vision. In this context, this plan period is key to shaping places that are adaptive and resilient to a changing climate, as well as being low-carbon.

STRATEGIC OBJECTIVES

We welcome SO5: *Climate Change and environmental limits*, but this should include the role of green infrastructure (currently no reference). We welcome the focus on flood risk, but green infrastructure plays a much broader role in resilience building – including providing shade and urban cooling (especially during increasingly likely heat waves), filtering and buffering poor air, and providing connected habitats that supports biodiversity – which is foundational to life systems, including food production.

We welcome SO6: *Our District's distinctive qualities*, but feel that biodiversity could be better framed as a foundational need (reflecting the extent of the ecological crisis) rather than a 'quality'.

MEETING STROUD DISTRICT'S COMMUNITY AND GREEN SPACE NEEDS UP TO 2040

We strongly welcome 'a mapped GI network, linking urban areas to the wider countryside, identifying important habitats, landscape features, river and green corridors and ecological networks'. We would highlight the current work of the Gloucestershire Local Nature Partnership in mapping a county-wide Nature Recovery Network, and would welcome an explicit reference to this work in the Local Plan, and clarification on how it will influence off-site delivery (where appropriate) of biodiversity net gain.

We note the mitigation strategy for the Cotswold Beechwoods SAC, to assess and address recreational pressures including from growth within Gloucester. We understand this is currently in development.

CORE POLICIES

DCP1: Delivering Carbon Neutrality by 2030

We strongly welcome this new core policy which sets a clear precedent for the planning system to deliver on Stroud District's climate emergency commitments.

We welcome the policy requirement that all new development must be 'designed to maximise green infrastructure to sequester carbon and to support local food production'. We advise amending this to: 'designed to maximise green infrastructure and its multiple benefits including carbon sequestration, nature recovery and local food production' to ensure that green infrastructure is ecologically appropriate and design does not focus on carbon storage potential at the expense of biodiversity and healthy ecological function.

We also welcome the requirement, *‘designed to reduce vulnerability to and provide resilience from the impacts arising from a changing climate whilst not increasing the potential for increased greenhouse gas emissions in doing so’*. We highlight here the role of trees & woods in building resilience, in particular in providing shade and urban cooling, helping alleviate the impacts of flooding, improving air quality, supporting biodiversity and providing wellbeing benefits.

Given the important role of trees in carbon storage and building resilience to the impacts of climate change, we would welcome Stroud District setting an explicit requirement for tree provision. Explicit targets reduce the likelihood of best intentions being ‘negotiated out’. We would welcome a requirement for all development land to reach at least 30% tree canopy cover, which might translate to an explicit requirement for a number of trees per household developed (where species and design are ecologically appropriate). We would welcome the opportunity to work with Stroud District on shaping such a policy, which we are calling for in our [Emergency Tree Plan](#). Our guide to [Residential developments and trees](#) may help to provide a framework.

CP5: Environmental development principles for strategic sites

We would like to see an additional objective listed, e.g. *‘H. Minimise impact on the natural environment and optimise the multiple benefits of green infrastructure within and beyond the site’*.

CP6: Infrastructure and developer contributions

We would like to see green infrastructure explicitly mentioned as an equal component of infrastructure. Green infrastructure projects should equally be on the Infrastructure Delivery Plan and included on the CIL list as appropriate to ensure an integrated approach to funding and delivery.

CP8: New housing development

We welcome that *‘Major residential development proposals will be expected to enhance biodiversity on site and, where appropriate, through a network of multi-functional green spaces, which support the natural and ecological processes’*. However, this principle should be expanded to **all** development proposals, and not just major schemes. This also aligns with Defra’s imminent biodiversity net gain requirements.

HC1: Detailed criteria for new housing developments

We welcome the requirement that sites will not *‘result in the loss of locally valued habitat which supports wildlife’*. We would like to also see an explicit reference to the positive planning of biodiversity net gain, over and above the principle of no loss.

DHC7: Provision of new open space and built and indoor sports facilities

Access to a healthy natural environment is crucial for health and wellbeing, supported by a [growing body of evidence](#). Trees and woodland are particularly valuable given the unique

experience they provide, their prominence in the built environment, low maintenance cost and their ability to accommodate large numbers of visitors.

We recommend that our [Woodland Access Standard](#) also be adopted as a measure of success. This standard aims to ensure that everyone has reasonable access to woodland. 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 be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

CP11: New employment development

We strongly welcome the requirement that sites '*Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including SuDS and green infrastructure)*'. We would welcome an explicit requirement for employment sites to contribute to a canopy cover target across all development sites (we'd recommend at least 30%). As well as providing climate resilience benefits, trees on employment sites are beneficial to a productive working environment due to their wellbeing benefits.

ES1: Sustainable construction and design

With regards sustainable sourcing of materials, we highlight the importance of promoting sustainably sourced locally grown timber as an effective way to lock up carbon while supporting sustainable forestry. The Committee on Climate Change has produced several useful reports on this issues including: [Wood in Construction in the UK](#); and [UK housing: Fit for the future?](#) Building on their recommended national target (that 40% developments should use timber frames), the Council might consider adopting a similar, or more ambitious, target. A recent example from South Somerset's Local Plan (submitted to inspector) reads: '14.48: ... *The procurement of locally grown timber products to the UK Woodland Assurance Standard (UKWAS) should be supported, in particular in relation to development, in order to achieve improved sustainability of construction and in support of local supply chains.*'

ES5: Air quality

We recommend amending '*managing and expanding capacity in the natural environment to mitigate poor air quality*' to '*managing and expanding capacity in the natural environment, including through trees and hedgerows, to mitigate poor air quality*' for clarity.

ES6: Providing for biodiversity and geodiversity

We strongly welcome that development proposals '*shall provide a net gain in biodiversity through enhancing and creating ecological networks within and connecting beyond the district*'. We support Stroud District's intention here to ensure biodiversity net gain requirements support a strong ecological network that is locally appropriate.

We strongly welcome ‘development that would impact on the strategic ecological network causing fragmentation or otherwise prejudice its effectiveness will not be permitted.’ We would welcome clarity on whether the Council intends to formally adopt the Gloucestershire Nature Recovery Network currently in development as this ‘strategic ecological network’.

We would like to see referenced in this policy that development will not be permitted where it destroys or damages irreplaceable habitat, including ancient woodland and ancient and veteran trees. This follows NPPF para 175c, which states: ‘Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.’

ES8: Trees, hedgerows and woodlands

We strongly welcome that ‘Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of locally valued and/or protected trees, hedgerows, community orchards, veteran trees or woodlands will not be permitted’. Per the previous comment, we would like to additionally see explicit reference to the protection NPPF para 175c gives to irreplaceable habitats (including ancient woodland and veteran trees), where ‘wholly exceptional circumstances’ is stronger wording than ‘unacceptable’.

In addition to the Ancient Woodland Inventory, we’d highlight the [Ancient Tree Inventory](#) as a useful (although not comprehensive) source of information on identified ancient and veteran trees. Our publication [Planners’ Manual for Ancient Woodland and Veteran Trees](#) might provide a useful resource.

We recommend specifying ‘arboricultural best practice’, e.g. a requirement to follow BS:5837. In the case of this standard, we’d advise that for ancient and veteran trees, where a precautionary approach is warranted, the Root Protection Area should be 15 times the diameter or five metres beyond the crown, whichever is greater.

To help avoid the spread of disease, we would welcome a requirement that trees (both replacement and landscaped trees) are procured from sources with sound biosecurity measures – including sourced and grown locally or at least in the UK.

DES2: Green Infrastructure

We strongly welcome this policy. As mentioned elsewhere, we’d recommend this references the Nature Recovery Network currently in development by the Gloucestershire Local Nature Partnership.

SPATIAL STRATEGY

We welcome that protecting ancient woodland is embedded in the Stroud Valleys vision (p62), which reflects the ecological and cultural importance of this rare habitat in the area and the need to actively protect it.

Nailsworth (p71)

Development location PS06 'The New Lawn' is adjacent to ancient woodland (26.9ha ancient semi-natural woodland (ASNW) at High/Bolas Woods). ASNW is an exceptionally rare and valuable habitat, and is defined as irreplaceable in the NPPF (para 175c), which specifies that developments that would destroy or damage such habitat should be refused. Changing the site's use from a football club to a residential site with 80 dwellings will highly likely increase disturbance and pressure (including recreational) on this ancient woodland. **At this stage we object to this site allocation on the basis that it contravenes NPPF para 175c.**

Notwithstanding this objection, if the site did go forward, then any application must be refused unless it clearly avoids disturbance, including a buffer of at least 50m from the ASNW site.

Hardwicke and Hunts Grove (p105)

Development location PS32 'South of M5/J12' includes ancient trees, specifically three ancient oak trees as identified on the Ancient Tree Inventory (although a site survey may identify more). In accordance with NPPF para 175c, which includes ancient and veteran trees in its definition of irreplaceable habitat, these trees must be protected from the impacts of development. **At this stage we object to this site allocation on the basis that it is vulnerable to contravention of NPPF para 175c.**

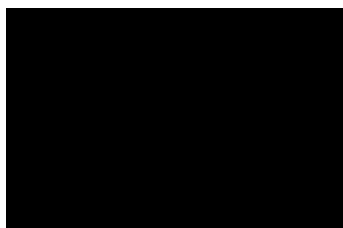
Notwithstanding this objection, any application coming forward here should include a buffer of at least 15 times the diameter or five metres beyond the crown of the tree, whichever is greater. We recommend this is specified as a policy requirement in ES8, as noted above.

New garden villages (p119)

We welcome the intent to champion best practice garden village principles at the new settlements at Sharpness and Wisloe. When planned for from the earliest stages of development, green infrastructure is likely to become better established, more championed by residents (through careful design) and can be lower cost. We would welcome these settlements being master-planned in accordance to the Building with Nature green infrastructure benchmark or similar.

If you have any queries on the above, please do not hesitate to get in touch.

Yours faithfully,



South West External Affairs Officer



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