

The Woodland Trust

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Re: Consultation on Woodford Neighbourhood Plan

Woodland Trust response

Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Woodford, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.

Vision, Objectives and Aims of Policies and Aspirations

The Woodland Trust is pleased to see that your Neighbourhood Plan identifies the important role that trees and woodland plays, and that opportunities should be taken to increase tree and woodland cover in appropriate locations.

Trees are some of the most important features of your area for local people. This is being acknowledged with the Local Plan being taken forward for Stockport, and the Issues Paper (2017) which acknowledged the fact that your authority has the most tree cover across Greater Manchester with close to 25 per cent cover, including some ancient woodland. Woodlands and trees provide benefits through recreation, carbon storage and capture and flood mitigation, and Stockport are looking at new tree planting, and also positive woodland management.

Therefore, this emerging Local Plan should also be taken into account with an objective for your Neighbourhood Plan for Woodford, and the environment should be amended to include the following:

To preserve and protect the openness of the Green Belt, the rural character, the landscape, *any ancient and veteran trees*, important views, natural features and biodiversity are retained for the benefit of the local community

Protecting the countryside and green spaces

We are pleased to see that policy ENV2 acknowledges the vital contribution of the countryside, which is characterised by numerous mature native trees, particularly oaks, and a network of native hedgerows, and how these need to be conserved and also enhanced by your Neighbourhood Plan for Woodford. But this should also recognise the fact that development should not lead to loss or degradation of trees in your parish. Increasing the amount of trees in Woodford will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

Information can be found here: http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/

Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). On 5th March 2018 the Prime Minister Theresa May launched the draft revised NPPF for consultation. Paragraph 173 c states:

development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss;

Whilst recognising that this policy is draft we believe it must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland.

Therefore, we would recommend that policy ENV2 should also include:

"Substantial harm to or loss of irreplaceable habitats such as trees, should be wholly exceptional".

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information:

https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences

We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Woodford. 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. Whilst, 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, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

Protecting natural features which are a key aesthetic component of the landscape

Whilst protecting natural features is being take into account with Policy ENV3, it should also seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new housing proposals. There are Natural England and Forestry Commission standards which can be used with developers on this:

The 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.
- 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.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality

implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication *Stemming the flow* — the role of trees and woods in flood protection - https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/.

Woodland Trust Publications

We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite: https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/ which may give you further ideas for your plan.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff

In addition other Woodland Trust research which may assist with taking your Neighbourhood Plan foreword is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: https://www.woodlandtrust.org.uk/publications/

Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/

If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price — Planning Advisor 0343 7705767 victoriabankesprice@woodlandtrust.org.uk

Best wishes and good luck with your plan

Ian Lings – Local Planning Support Volunteer

On behalf of the Woodland Trust