

LDF

From: Nick Sandford [REDACTED]
Sent: 05 December 2016 13:04
To: LDF
Subject: Local Plan Review Regulation 18 consultation

Dear Sir/Madam,

I would like to respond to your consultation on the proposed local plan review. I have tried to use your response form but the PDF documents have frozen on two occasions and I have lost the data which I put onto them. So, to avoid further delay, I hope you can accept an email submission instead.

Please treat this email as a response to Question 12 of the form, in relation to the policies in the Local Plan and how we would like to see them revised. I am writing on behalf of the Woodland Trust, who are the UK's largest woodland conservation charity, owning and managing over 1,200 woods throughout the UK and having nearly 500,000 members and active supporters.

Being Carbon Neutral

We welcome the commitment in Policy QE1 to requiring new development to generate a proportion of its energy from renewable or low carbon sources.

We would like to see the core strategy encourage more use of wood as a fuel providing that harvesting is carried out sensitively and respects the biodiversity, scale and cultural importance of the site especially ancient woods.

We believe that woodland owners can benefit from the developing markets for wood fuel and that income streams generated would help owners deliver environmental and social benefits from their woods to society. Developing a market for low-grade timber through wood fuel projects could also make other woodland management operations with a high biodiversity benefit more economically viable, for example the restoration of planted ancient woodland sites currently under non-native conifers.

Being Natural and Durable

We welcome the reference in the vision to the need for an integrated green infrastructure network and the specific reference to the role of woodland in mitigating the effects of climate change. We also welcome the statements in policy QE3 about the need for the green infrastructure network to be well connected. Looking for opportunities to reconnect areas of natural greenspace and habitats which have become fragmented can be of great benefit in enabling species to move and adapt to the impact of climate change.

The objectives and policy QE4 recognise that flood risk is a particular issue in Warrington. We welcome reference in the objectives to the role which green infrastructure can play in alleviating risk from certain types of flooding.

You could also consider including a specific reference to the role which trees and woodland can play in alleviating flood risk and improving water quality as part of green infrastructure. The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. They 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": <http://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow>

The recently published 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).

Local Authorities should steer risk management towards developing green infrastructure, increasing tree cover and investment in the management of trees. Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission’s publication, *The Case for Trees in development and the urban environment* (Forestry Commission, July 2010), explains how: ‘the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems’.

We would like to see the wording in Policy QE5 give more explicit protection to ancient woodland and ancient and veteran trees, in view of the fact that these are irreplaceable habitats.

Ancient woodland (land that has been continually wooded since at least AD1600) is our richest land habitat. Ancient woods form a unique link to the primeval wildwood habitat that covered most of lowland Britain following the last Ice Age.

Ancient woods are uniquely valuable. Their wildlife communities are generally richer than those of recent woods⁵, having developed over long periods of time. They contain a high proportion of rare and vulnerable species, many of which require the stable conditions that ancient woodland affords. As the terrestrial habitat most representative of original, natural, stable conditions, ancient woodland is home to more threatened species than any other habitat in the UK. Ancient woods are the jewel in our woodland crown. They are our richest sites for wildlife and are full of cultural heritage. Ancient woods are also some of our prettiest woodland - some have carpets of bluebells, wood anemones and celandines in spring.

- The draft National Policy Planning Framework clearly states: “...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...” (DCLG, July 2011, para 169).

We would urge you to consider adopting a wording such as that in the Leeds City Council draft Core Strategy (2011) POLICY G5B: ANCIENT WOODLAND AND VETERAN TREES
Development, which would result in harm to, or the loss of Ancient Woodland and Veteran Trees, will be resisted...

We welcome the commitment in the supporting text to Policy QE6 to the use of access standards to assess the need for different types of green infrastructure.

As stated earlier, we believe that trees and woods are a particularly important component of GI. . They are good for our health, they improve our quality of life, and they are a vital part of healthy, functioning landscapes that can provide us with the necessities of life. The Woodland Trust believes that everyone should be able to access woodland within easy reach of their homes. Space for People, the Woodland Trust’s analysis of access to woodland in the UK shows that in order for this to happen, we urgently need to begin creating more woodland close to where people live.

So woods and trees can clearly improve the quality of life in our communities but in order to do so it is vital that there are sufficient woods close to where people live. At present less than 15% of the UK population live within easy walking distance of a wood.

Using the Woodland Access Standard, developed by the Woodland Trust and now adopted by many others including the Forestry Commission, the proportion of people who currently have access to woodland within easy reach of their homes was calculated.

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 2 ha in size
- That there should also be at least one area of accessible woodland of no less than 20 ha within 4km (8km round trip) of people

Our standard shows that in Warrington currently 19% of people have access to a 2ha wood within 500m of their home and 57% have access to a 20ha wood within 4km. These figures indicate that there is a particular need to create smaller woods near to where people live.

We would like to see the Council, in its Local Plan, adopt a strong commitment to new woodland creation as part of green infrastructure and to set targets for the amount of woodland which is needed. Our Space for People report (see <http://www.woodlandtrust.org.uk/en/about-us/publications/Documents/space-for-people-new.pdf>) extrapolates our access standard into possible targets for new woodland creation and shows that to satisfy the first part of the access standard, 160ha woodland would be needed.

As you may know, the Woodland Trust manages a number of small urban woods in Warrington and Runcorn (mainly sites inherited from the former development corporation) and we would be happy to advise you on creating new woods if you were able to find suitable areas of land, either in public or private ownership.

We have recently produced a report entitled Trees or Turf (see www.woodlandtrust.org.uk/treessavemoney) which shows that selective conversion of short mown grass to woodland can be a highly cost effective method of urban greenspace management for local authorities.

See contact details as below:

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