

From: [REDACTED]
Sent: 22 March 2023 19:29
To: Local Plan
Subject: Local Plan Consultation - Priority Habitat & Ancient Woodland

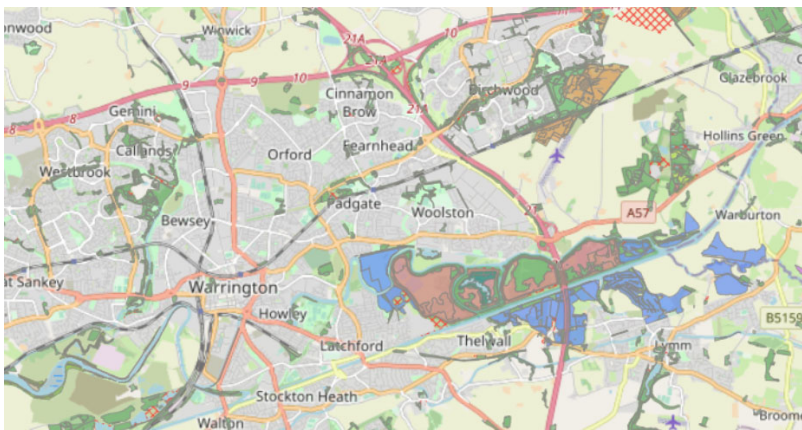
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Thank you for the opportunity to consult on yet another stage of the local plan.

I cannot find any reference to Ancient Woodland nor Priority Habitat in the Updated Proposed Submission Version Local Plan 2021 – 2038 Habitats Regulation Assessment – including assessment of Main Modifications March 2023 although connected habitat is mentioned. There is an emphasis on designated sites but not Priority Habitat nor Ancient Woodland upon which WBC has legal and moral obligations to protect and enhance.

Warrington has many areas of identified priority habitat as shown in the diagram below.



UK BAP priority habitats cover a wide range of semi-natural habitat types, and were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).

As a result of devolution, and new country-level and international drivers and requirements, much of the work previously carried out by the UK BAP is now focussed at a country-level rather than a UK-level, and the UK BAP was succeeded by the '[UK Post-2010 Biodiversity Framework](#)' in July 2012. The UK list of priority habitats, however, remains an important reference source and has been used to help draw up statutory lists of priority habitats in [England](#), [Scotland](#), [Wales](#) and [Northern Ireland](#), as required under [Section 41 of the Natural Environment and Rural Communities \(NERC\) Act 2006](#) (England), [Section 7 of the Environment \(Wales\) Act 2016](#), [Section 2\(4\) of the Nature Conservation \(Scotland\) Act 2004](#), and [Section 3\(1\) of the Wildlife and Natural Environment Act \(Northern Ireland\) 2011](#).

The National Planning Policy Framework makes clear that Local plans in England should include policies to promote the preservation, restoration and re-creation of priority habitats.

Rather than just concentrating on European designated sites which is laudable you must also consider priority habitats as well as ancient woodland which is irreplaceable.

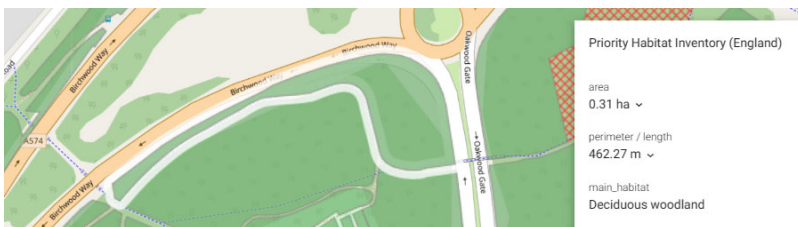
WBC has not done well in fulfilling its obligations to Biodiversity despite declaring a climate emergency. Let me give you some examples.

1) Ordnance Avenue - A bus only road was put through deciduous woodland (green) and additional habitats (red hatched) both identified priority habitats the council are supposed legally to protect and enhance.



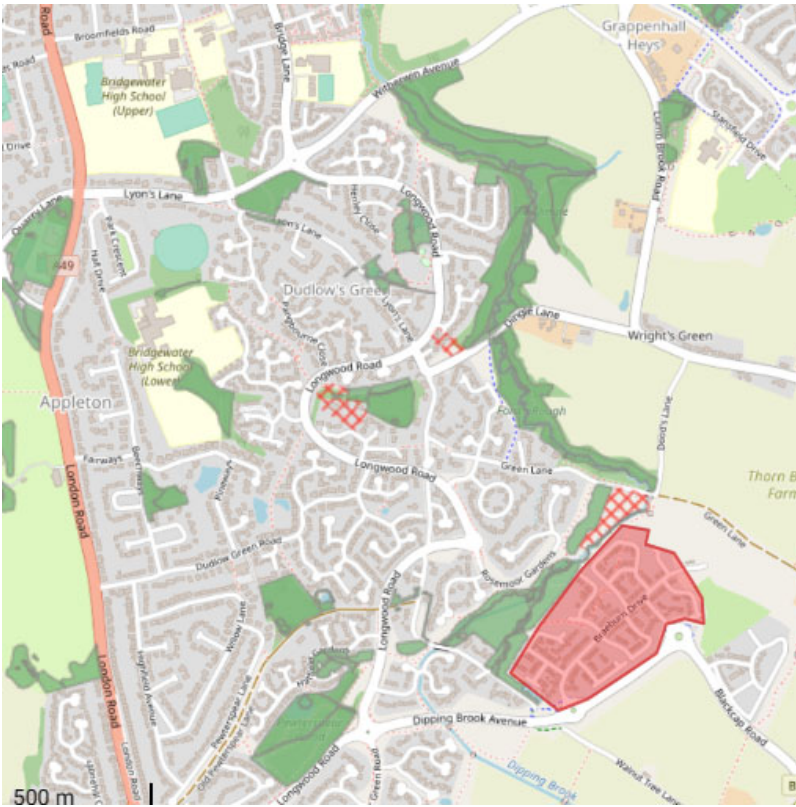
2) Birchwood Way

A slip way was added to the "dog bone" roundabout which resulted in significant felling of priority habitat deciduous woodland. The landscaping did not include indigenous native woodland shrub species to enhance biodiversity. Instead species such as Rhododendron were introduced by WBC. A species which has some varieties that are invasive and is known to harbour phytophthora - a tree disease that affects different species of tree including oaks. Oaks are present in the priority habitat woodland you reduced in size and replaced with an oak harbouring non native plant despite a legal obligation not to do so.



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The recent development of houses continue to hem in ancient woodland and priority habitat. Not only with little to no buffering to protect these priority habitats WBC has a legal obligation to protect and enhance but also affecting water catchment, flow and variability over natural watercourses and the habitats that need them.



The Local plan also needs to consider where Deep Peat is and a commitment not to build or disturb it as this will release substantial amounts of CO2. Currently WBC has decided not to oppose a development on deep peat despite declaring a climate emergency just north of the M62 at Birchwood.



As you can see from the examples above Warrington Borough Council is failing in its legal obligations to protect and enhance identified areas of biodiversity under the Biodiversity Action Plan (BAP). It is not a good custodian of habitats despite declaring a climate emergency. The Local Plan must go further than considering designated sites with high legal protection and status and also consider areas identified under BAP to protect and enhance these specified areas rather than vague references to connected habitat.

Areas of peat should be designated as no build areas and restored as habitat if WBC is serious about addressing the Climate Emergency.

Images courtesy of Land App.

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