

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Richard O'Callaghan

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

A group or organisation

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	The Woodland Trust
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	-
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

MD2 South East Warrington Urban Extension

2. What does your comment relate to? Please select one option.

None of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		
Compliant with the Duty to Co-operate		

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

The Trust is concerned about site allocations MD2 and MD4 as they could lead to the damage and loss of ancient woodland.

Planning Policy

National Planning Policy Framework (NPPF) paragraph 118 states that "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, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

Natural England's standing advice for Ancient Woodland and Veteran Trees¹ states:

"Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

Paragraph 5.2.4 of the UK Biodiversity Action Plan (UKBAP) includes objectives to conserve, and, where practicable, enhance:

- the quality and range of wildlife habitats and ecosystems;
- the overall populations and natural ranges of native species;
- 1 <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>
- internationally important and threatened species, habitats and ecosystems;
- species, habitats and natural and managed ecosystems characteristic of local areas;
- and
- biodiversity of natural and semi-natural habitats where this has been diminished over recent decades.

Section 40 of the Natural Environment and Rural Communities Act 2006 requires all public authorities (including LPAs), in exercising their functions to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Impacts on Ancient Woodland

Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and

ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. Majorly adverse impacts would occur as a result of the removal of large areas of woodland, much of which contains high quality, valuable trees, to make way for construction works.

When land use is changed to a more intensive use such as in this situation plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These detrimental edge effects can result in changes to the environmental conditions within the woodland and consequently affecting the wood's stable conditions. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.

Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging edge effects, serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods. Natural England's standing advice for Ancient Woodland and Veteran Trees states:

"Impacts of development nearby can include these effects on the trees and woodland, and the species they support:

- compacting the soil around tree roots
- breaking up or destroying connections between woodland and other habitats
- reducing the amount of semi-natural habitats (like parks) next to ancient woodland
- changing the water table or drainage
- increasing the amount of pollution, including dust
- increasing disturbance to wildlife from additional traffic and visitors
- increasing light pollution
- increasing damaging activities like flytipping and the impact of domestic pets
- changing the landscape character of the area."

We have already seen the damage that development can have on ancient woodland with the recent housing development next to the Woodland Trust Callands Wood in Warrington. It is vital that development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and Natural England recommend "leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or tree (depending on the size of development, a minimum buffer should be at least 15 metres)."

The size of the site allocations MD2 and MD4 suggests that large scale development could potentially take place. The minimum 15m buffer recommendation to all development is not effective in ensuring that ancient woodland within and/or adjacent is not affected by potential future development. In this instance we would recommend buffering of 50m.

Conclusion

The Trust is concerned about the potentially adverse impacts that the proposed site allocations MD2 and MD4 will have in relation to areas of ancient woodland within and/or adjacent to site allocations. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust objects to the inclusion of these site allocations as they are likely to cause damage and/or loss to areas of ancient woodland within or adjacent to their boundaries. For this reason we believe the sites detailed below are unsound and should not be taken forward. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

We hope you find our comments to be of use to you. The Woodland Trust is happy to provide any additional information or support regarding the protection of ancient woodland.

If you require any further information regarding points raised within this document, then please do not hesitate to contact us.

MD2

Ancient woodland and veteran trees affected by this site allocation:
Woodland Trust ASNW, Lumb Brook Valley North, SJ627849

3 ATI trees

ID 153,345 ancient dead wild cherry

ID 153,354 veteran wild cherry

ID 153,353 veteran wild cherry

Woodland Trust Wood, Grappenhall Heys, SJ627858

MD4

Woodland Trust Radley Plantation, 16915

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

See points about buffering in answer to Q4.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

No, I do not wish to participate at the oral examination

You have just completed a Representation Form for MD2 South East Warrington Urban Extension.

Please select what you would you like to do now?

Submit response (I am a Developer / Landowner / Group / Organisation)