

PLANNING CONSULTATION



Response Form

Deadline 9 December 2011

Mid Devon District Council is consulting on proposed new planning policies for:

Meeting Housing Needs (Supplementary Planning Document)

Website link: www.middevon.gov.uk/spd

Green Infrastructure Plan (including Strategy to 2026 and Delivery Plan as Supplementary Planning Document)

Website link: www.middevon.gov.uk/gip

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Comments 1

Are you
commenting
on

Planning Document
Meeting Housing
Needs Supplementary

Green Infrastructure Plan

(please tick or check the
appropriate box)

Please indicate which sections, policies or paragraph numbers your comments refer to

**GI Assessment – Section 2
Paragraphs 4.7 and 4.29**

Are you

Objecting

Supporting

(please tick or check the appropriate box)

X

Please state clearly why you are objecting to or supporting the specified parts of the document/s (continue on a separate sheet if necessary)

Whilst we are pleased to see the references to Ancient Woodlands and Accessible Woodlands in Paragraph 4.29, we would like to see the reference to woodland in Paragraph 4.7 specifically mention the irreplaceable habitat of ancient woodland.

Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 86% of ancient woodland in the South West has no statutory protection. This is particularly relevant as ancient woodland is still facing considerable threats – research from the Woodland Trust shows that in the last decade 100 square miles (26,000 hectares or 5% of the total amount of ancient woodland remaining in the UK) of ancient woodland in the UK has come under threat from destruction or degradation. Development threats associated with transport and infrastructure appeared to be the most significant (31% of cases), followed by amenity and leisure developments (14%), housing (10%), and quarrying and mineral extraction (6%).

With only 2.4% of the land area in Great Britain and, 2.1% of Mid Devon District Council, covered by ancient woodland, we cannot afford any more of this finite resource to be lost forever in the locality (source: Ancient Woodland Inventory, Natural England).

We therefore suggest an amended sentence in Paragraph 4.7 to read (amendments emboldened in italics) : 'Woodland constitutes about 19% of Mid Devon's total land coverage, **with ancient woodland accounting for about 2%**, and provides habitat 'stepping stones' for a variety of species'.

Would you like to be notified when the Council adopts the documents?

(please tick or check the appropriate box)

Meeting Housing Needs Supplementary Planning Document

Green Infrastructure Plan (Strategy to 2026 and Delivery Plan)

Comments 2

Are you commenting on

(please tick or check the appropriate box)

Planning Document Meeting Housing Needs Supplementary

Green Infrastructure Plan

Please indicate which sections, policies or paragraph numbers your comments refer to

Section 3 Policy GI/1 – Delivery of Green Infrastructure

Are you

Objecting

Supporting

(please tick or check the appropriate box)

X

Please state clearly why you are objecting to or supporting the specified parts of the document/s (continue on a separate sheet if necessary)

Whilst we are pleased to see 'Public access to natural green space and woodland' as an objective, we should point out that the best way to increase access to woodland is to create new woodland that is publicly accessible.

- In a letter to all Local Authorities calling for support for the Government's National Tree Planting Campaign ('The Big Tree Plant'), the **Environment Minister Caroline Spelman** has extolled the many virtues of trees: *'Trees offer so many benefits to our citizens. They capture carbon and hold soils together, prevent flooding and help control our climate. They also add immeasurably to our quality of life by making areas more attractive and healthier places to live. In recent years the number of trees being planted annually across the country has declined, and could decrease further, unless action is taken to reverse this trend'* (letter to all Local Authorities, 12th November 2010).
- An important publication from the Forestry Commission, ***The Case for Trees in development and the urban environment*** (Forestry Commission, July 2010), sets out *'The multiple value of trees for people and places – increasing greenspace and tree numbers is likely to remain one of the most effective tools for making urban areas more convivial'*,

We therefore suggest an amended sentence in Policy GI/1 to read (amendments emboldened in italics) : ***'Increase Public access to natural green space and woodland by habitat creation'***.

Would you like to be notified when the Council adopts the documents?

(please tick or check the appropriate box)

Meeting Housing Needs Supplementary Planning Document

Green Infrastructure Plan (Strategy to 2026 and Delivery Plan)

Comments 3

Are you commenting on

(please tick or check the appropriate box)

Planning Document Meeting Housing Needs Supplementary

Green Infrastructure Plan

Please indicate which sections, policies or paragraph numbers your comments refer to

**Section 3
Policy GI/3 – Biodiversity
Paragraph 1.11**

(This area is intentionally left blank for providing comments.)

Are you

(please tick or check the appropriate box)

Objecting

Supporting

Please state clearly why you are objecting to or supporting the specified parts of the document/s (continue on a separate sheet if necessary)

1. We object to the reference in GI/3 to a 'net gain in biodiversity' unless accompanied by a commitment to absolute protection of semi-natural UKBAP habitats such as ancient woodland. Ancient woodland (land that has been continually wooded since at least AD1600) is our richest terrestrial 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.

With only 2.4% of the land area in Great Britain and, 2.1% of Mid Devon District Council, covered by ancient woodland, we cannot afford any more of this finite resource to be lost forever in the locality (source: Ancient Woodland Inventory, Natural England).

In terms of compensatory measures, it is impossible to replace ancient woodland as this habitat has evolved over centuries and it is impossible to replace hundreds of years of ecological evolution by planting a new site or attempting to translocation.

Under section 74 of the **Countryside and Rights of Way Act 2000**, the Government has a statutory duty to publish lists of priority conservation habitats. Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity. The UK BAP targets includes a new Habitat Action Plan for Native Woodland which specifies a clear 'maintenance' target of no more loss of ancient woodland - <http://www.ukbap.org.uk/BAPGroupPage.aspx?id=98>. It is therefore axiomatic that Mid Devon District Council has a statutory obligation to protect ancient woodland.

We would therefore like to see Policy GI/3 contain a commitment to maintenance of UKBAP habitats.

2. The UK BAP refers to **native** woodland as a priority habitat. We therefore suggest an amended sentence in Paragraph 1.11 to read (amendments emboldened in italics) : 'There are several priority habitats within the broad classes of wetland, lowland habitats and **native** woodland'.

Would you like to be notified when the Council adopts the documents?

(please tick or check the appropriate box)

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Green Infrastructure Plan (Strategy to 2026 and Delivery Plan)

Comments 4

Are you commenting on

(please tick or check the appropriate box)

Planning Document Meeting Housing Needs Supplementary

Green Infrastructure Plan

Please indicate which sections, policies or paragraph numbers your comments refer to

Section 3

Policy GI/6 – Integrating green infrastructure in major development

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Are you

(please tick or check the appropriate box)

Objecting

Supporting

Please state clearly why you are objecting to or supporting the specified parts of the document/s (continue on a separate sheet if necessary)

We would like to see a reference in this Policy GI/3 to the positive role that land use management, such as native woodland creation, can play in mitigating the climate change effects on flooding and also water quality.

We believe that native woodland can make a significant contribution to water risk management in green infrastructure.

Throughout the UK winter is predicted to be wetter and summers drier and there is also a predicted increase in the frequency of very heavy rainfall. Trees can reduce the likelihood of surface water flooding, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (*Using green infrastructure to alleviate flood risk, Sustainable Cities - www.sustainablecities.org.uk/water/surface-water/using-gi/*).

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 ***Woodland actions for biodiversity and their role in water management*** (pdf) - <http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx>.

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'.

The South West Forestry Framework Implementation Plan 2009-2012 (Forestry Commission, 2009) contains two key actions – "2.4: Undertake pilot projects using new planting or woodland management to manage river flows and contribute to Water Framework Directive objectives" and "2.5: Develop projects to demonstrate and monitor benefits of riparian planting in reducing river temperatures".

We therefore suggest an amended sentence in section (1) c of Policy GI/6 to read (amendments emboldened in italics) : 'climate change adaptation and mitigation by design ***and land use management such as native woodland creation***'.

ongoing annual costs have been discounted using a discount rate of 3.5% to provide present value (PV) estimates over a period of 100 years, since the offsets are assumed to be preserved in perpetuity and the annual PV costs are negligible after 100 years' This effectively means the cost is for restoration and maintenance in perpetuity, and this should be made clear to avoid misinterpretation.

2. We are concerned at the absence in the Biodiversity section of any costs for woodland under habitat creation. Whilst we appreciate that Mid Devon DC has already has a high proportion of woodland, much of this is likely to be coniferous, which has less value for delivering multiple benefits for green infrastructure than native woodland. We also appreciate that there is a separate costing for woodland under climate change mitigation.

Notwithstanding this, native woodland creation is a key delivery tool for green infrastructure at all scales, large or small, and should be an integral component of any green infrastructure habitat mix. Whilst Mid Devon may have above average woodland cover, the UK as a whole is one of the least wooded areas of Europe, with just 11.8% woodland cover compared to around 44% for Europe as a whole and 27% for the EU. The Woodland Trust is therefore working to achieve its ambitious aim of doubling native woodland cover by 2050.

In addition, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, which indicates a noticeably below average score for Mid Devon.

The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- 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.

Applying this standard in Mid Devon District, with equivalent comparisons for Devon County Council plus the South West as a whole, gives the following figures (see table below). It shows that Mid Devon exhibits a marked deficit in accessible woodland for both size categories. This presents an excellent opportunity for using both new and existing accessible woodland in order to support robust green infrastructure delivery for sustainable neighbourhoods. The data used can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form.

Accessibility to Woodland in Mid Devon District using the Woodland Trust Woodland Access Standard

		Mid Devon DC	Devon County Council	All SW
Accessible woods	% population with access to 2ha+ wood within 500m	2.38%	8.55%	12.84%
	% population with access to 20ha+ wood within 4km	49.31%	67.78%	67.35%

'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. The full 'Space for People' report can be found at <http://www.woodlandtrust.org.uk/en/about-us/publications/key-publications/space-for-people/pages/space-for-people.aspx>.

We therefore feel strongly that woodland creation should form a category for biodiversity habitat creation in the table on ps 25/26.

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