



The Woodland Trust
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Dear Sir / Madam,

Stroud District Council: Local Plan Consultation Response – The Woodland Trust

About the Woodland Trust:

The Woodland Trust (“the Trust”) is the UK’s leading woodland conservation charity and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people’s understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, including Northdown Wood at Bickleigh. In total our sites cover over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

We welcome the opportunity to comment on the above CONSULTATION.

The Woodland Trust is responding to the Regulation 19 Consultation on the following basis:

By making the following changes, the plan will be more effective in delivering sustainable development.

The Woodland Trust seeks modifications to the following site allocations to ensure the protection of the following ancient, veteran and notable trees and woodlands:

Table 1: Site Allocation that the Woodland Trust Objects to

Site reference number (Policy Reference)	Name of site	Nearest Town	Proposed Development description	Proximity to ancient woodland – within or adjacent?	Ancient woodland/tree information
PS06	The New Barn, Nailsworth	Nailsworth	Brownfield redevelopment for housing	Adjacent	High/Bowlas Wood ASNW (grid reference: ST83629992)
PS32	Quedgeley East Extension	Gloucester	Employment	Within Within Within	Ancient Oak (ATI no: 3352) Ancient Oak (ATI no: 29364) Ancient Oak (ATI no: 10748)
PS34	Sharpness Docks	Newtown	Mixed use	Within Within Within Within	Veteran Oak (ATI no: 113473) Veteran Oak (ATI no: 113471) Veteran Oak (ATI no: 113469) Notable Horse Chestnut (ATI no: 113704)

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it more important that vital protections for ancient woodland and veteran trees are upheld.

PSO6:

Proposed Change: Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be

required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

PS32 / PS34:

Proposed change: The Woodland Trust asks for a presumption in favour of the retention and enhancements of existing tree, woodland, and hedgerow cover. Planning permission should not be granted in these two site allocations where the proposal adversely affects these ancient, veteran, and notable trees which are defined in Natural England's inventory of ancient woodlands. If there is an unavoidable loss of trees on site, replacement trees should be planted on sites where appropriate at a rate of two new trees for each tree lost. Tree survey information should be submitted with all planning applications, where trees are present on site. The tree survey information should include protection, mitigation and management measures. Appropriate management measures will be required to be implemented to protect newly planted and existing trees, woodlands and / or hedgerows.

Wider Comments:

There are a number of areas where Stroud District Council could strengthen the policies within the plan for Ancient Woodland. The Woodland Trust welcomes the references made throughout the plan to Nature Based Solutions. The Woodland Trust advocates the maintenance of ancient woodland as a key tool for amongst other benefits, flood alleviation, air quality improvements and reducing urban heat island effect using trees. At Page 25, paragraph 2.3.14, the Trust is pleased to see the planned use of trees in landscaping projects for ecosystem services, such as those mentioned above.

Therefore, on page 21 of Part 2, I would recommend the inclusion of a last bullet 'including the use of Nature Based Solutions', to make this more explicit.

To that end, I am pleased to see in part 3F, page 191, that no development is planned in the Severn Vale to minimise flood risk and ensure growth is resilient to climate change.

The Woodland Trust welcomes the references to nature, health and wellbeing in Part 1, page 14, Part

2, page 28. I would like to refer you to the following case study publication:

<https://www.woodlandtrust.org.uk/publications/2013/10/healthy-woods-healthy-lives/>, for further information on Healthy Woods, Healthy Lives.

Part 2, page 36, we would welcome a reference to building with nature standards.

Finally, in part 6, page 284, I urge the inclusion in Policy ES3 of Ancient Semi Natural Woodland, and that the plan has the following line:

'Development which would result in the loss of ancient woodland, aged trees or veteran trees will not be permitted. Development proposals should maintain and extend tree cover where important to amenity, through the retention of important trees, appropriate replacement of trees lost through development and new planting to support green infrastructure'.

We know that local authority resources are limited: we have planning, urban, policy and community expertise that may be able to assist the team working on your local plans, green infrastructure strategies and climate change and ecological emergency plans. We are particularly keen to work with you to ensure new development works for trees; for example, in ensuring they deliver new NPPF requirements for tree lined streets.

Please do not hesitate to get in touch to discuss any of these items further. Finally, I would like to introduce you to the following document,

<https://www.woodlandtrust.org.uk/publications/2017/06/space-for-people-woodland-access/> which explains why access to woodland is so important to making a sense of place for communities.