



16th March 2018

**Re: Consultation on Rockbeare Neighbourhood Plan**

**Woodland Trust response**

*Thank you very much for consulting the Woodland Trust on your neighbourhood plan for Rockbeare, we very much appreciate the opportunity. Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.*

### Vision, Aim and Objectives

The Woodland Trust is pleased to see that one of your approved aims and objectives challenges for the natural environment of Rockbeare identifies the importance of protecting local woodlands.

Trees are some of the most important features of the area for local people. This is being acknowledged with the East Devon Local Plan 2013 to 2031 (2016), which identifies ancient woodlands and trees as being valuable, both individually and collectively, as natural assets which are irreplaceable, and it resists development resulting in the loss of woodland, hedgerows and trees. One of the objectives of Policy D3 (Trees and Development Sites) is to protect, manage and plan for the preservation of valued landscapes, such as trees and hedgerows and woodlands, and D1 (Design and Local Distinctiveness) indicates that planning proposals will not be permitted where they adversely affect trees worthy of retention. This general Local Plan policy should also be taken into account with the issues, vision and objectives in the Neighbourhood Plan for Rockbeare.

Therefore, the first Objective for the Natural Environment should be amended to also seek to protect and enhance the character of Rockbeare, and include the following paragraph as well:

*“Protect local woodlands, **ancient woodland, veteran trees hedgerows and trees**”.*

### Natural Environment

We are pleased to see that the Neighbourhood Plan for Rockbeare does identify the need to conserve and enhance its landscape, and how any new development in your Parish needs to respect its distinctive landscape character.

However, your Plan for Rockbeare should also seek to ensure development must conserve mature trees and hedgerows, so there is no loss or degradation of ancient woodland in your parish. It should also support conserving and enhancing woodland and trees, such as Oak trees, with management, and also to plant more trees in appropriate locations. Increasing the amount of trees and woods in Rockbeare will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.

Information can be found here: <http://www.magic.gov.uk/MagicMap.asp> and <http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/>

Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). On 5<sup>th</sup> March 2018 the Prime Minister Theresa May launched the draft revised NPPF for consultation. Paragraph 173 c states:

development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss;

Whilst recognising that this policy is draft we believe it must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland.

Therefore, we would recommend that your all of the land use policies of your Neighbourhood Plan should include something along these lines:

***“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.***

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017) identified the importance of ancient woodland, and how it should be protected and enhanced.

Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland in the geographical area of your Neighbourhood Plan. Standing Advice from Natural England and the Forestry Commission has some useful information:

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

The profile of Rockbeare identifies the need to retain and enhance its rural character as a small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Rockbeare, should also be taken into account with a Policy in your Plan.

Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Rockbeare. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.

### **Monitoring the Plan of Rockbeare**

Whilst Monitoring of your Neighbourhood Plan, and the impact of policies on change is being acknowledged, it should use this to seek to retain and enhance open green spaces, resist the loss of open space, whilst also

ensuring the provision of some more, to what extent there is considered to be enough accessible space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:

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 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.

The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees 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*** – the role of trees and woods in flood protection - <https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/>.

### **Woodland Trust Publications**

We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite: <https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/> which may give you further ideas for your plan.

Also, the Woodland Trust have recently released a planners manual which is a multi-purpose document and is intended for policy planners, such as community groups preparing Neighbourhood Plans. Our guide can be found at: <https://www.woodlandtrust.org.uk/mediafile/100820409/planning-for-ancient-woodland-planners-manual-for-ancient-woodland-and-veterandtrees.pdf?cb=8298cbf2eaa34c7da329eee3bd8d48ff>

In addition, other Woodland Trust research which may assist with taking your Neighbourhood Plan forward is a policy and practice section on our website, which provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease: <https://www.woodlandtrust.org.uk/publications/>

Our evidence base is always expanding through vigorous programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query. You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season: <http://www.woodlandtrust.org.uk/plant-trees/community-tree-pack/>

If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you. If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor 0343 7705767 [victoriabankesprice@woodlandtrust.org.uk](mailto:victoriabankesprice@woodlandtrust.org.uk)

Best wishes and good luck with your plan

**Ian Lings** – Local Planning Support Volunteer

On behalf of the Woodland Trust

