

Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AX

29th September 2023

Dear Arleta Miszewska,

Reference: APP/23/00488

Proposal: Application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access road, footways and cycleways, pumping station and drainage basins. | Land East Of, College Road, Purbrook, Waterlooville

Objection – direct loss of veteran trees

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided as part of the application to the local authority.

Natural England's standing advice on veteran trees states that they "*can be individual trees or groups of trees within wood pastures, historic parkland, hedgerows, orchards, parks or other areas. They are often found outside ancient woodlands. They are also irreplaceable habitats. A veteran tree may not be very old, but it has significant decay features, such as branch death and hollowing. These features contribute to its exceptional biodiversity, cultural and heritage value.*"

We note that the following trees identified in the Arboricultural Impact Assessment are also recorded on the Trust's Ancient Tree Inventory¹. We strongly **object** to this proposal on account of direct loss of the below trees in order to facilitate the development:

Tree no.	ATI no.	Species	ATI Categorisation	Grid reference
G78	198946	Common Hawthorn	Veteran	SU6922606975
	199053	Field Maple	Notable	SU6916706965
	198961	Wild Apple	Veteran	SU6916906966
	198945	Wild Apple	Veteran	SU6926106978
H81	199048	Spindle	Notable	SU6915706834

¹ <http://www.ati.woodlandtrust.org.uk/>

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Planning Policy

The National Planning Policy Framework, paragraph 180, states: *“When determining planning applications, local planning authorities should apply the following principles:*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists;”

Footnote 63, defines exceptional reasons as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

There is **no wholly exceptional reason** for the development in this location and as such this development should be refused on the grounds it does not comply with national planning policy.

Further to this, paragraph 174 of the NPPF states the following: *“Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”*. Where an application involves the loss of irreplaceable habitats, such as ancient woodland or ancient and veteran trees, net gain for biodiversity cannot be achieved. The development should be evaluated as meeting the wholly exceptional test before any compensation strategy is considered for the loss of irreplaceable habitats.

Impacts to Veteran Trees

It is essential that no veteran trees are lost as part of the development. The loss of any such trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Any loss of veteran trees can also be highly deleterious where there is a wider population of veteran trees within close proximity, which may harbour rare and important species.

We note that the Arboricultural Impact Assessment disputes the classification of the veteran trees which are verified on the Ancient Tree Inventory. We have reviewed the trees in question, and tree 199011 has been reclassified as a notable specimen. However, we will be maintaining our classifications of the three other veteran trees on site.

Trees are susceptible to change caused by construction/development activity. As outlined in ‘BS5837:2012 - Trees in relation to design, demolition and construction’ (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. It is

imperative that Natural England and Forestry Commission's standing advice on root protection areas for veteran trees is taken into account in planning decisions. This advice states: *"For ancient or veteran trees (including those on the woodland boundary), the **buffer zone should be at least 15 times larger than the diameter of the tree**. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone."*

With respect to notable trees, although not afforded the same protection in planning policy as ancient and veteran trees, notable trees are likely to develop veteran features if afforded time and space. As such, we ask that these trees are retained, and afforded suitable root protection areas in line with Natural England and Forestry Commission's standing advice to ensure their future longevity and protection.

Conclusion

Veteran trees are irreplaceable habitats, once lost they are gone forever. Any development resulting in loss or deterioration of veteran trees must consider all possible measures to ensure avoidance of adverse impact.

The Trust **objects** to this proposal on account of the direct loss of veteran trees. This application contravenes national planning policy designed to protect veteran trees and should be considered for refusal.

If you would like clarification of any of the points raised, please contact us via campaigning@woodlandtrust.org.uk

Yours sincerely,

Nicole Moses
Campaigner – Woods Under Threat
Woods Under Threat Team