



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

14th February 2020

Dear Ms Haywood,

Application: APP/19/01101

Proposal: Hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure. | Land East Of, College Road, Campdown, Purbrook, Waterlooville

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 29,000 hectares (71,000 acres) and we have 500,000 members and supporters.

Ancient Woodland

Natural England¹ defines ancient woodland “*as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] has been wooded continuously since at least 1600AD.*”

It includes: “*Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration*

Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi”

Both ASNW and PAWS woodland are given equal protection in the National Planning Policy Framework (NPPF) regardless of the woodland’s condition.

Veteran Trees

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 irreplaceable habitats with some or all of the following characteristics... A veteran tree may not be very old, but it has decay features, such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value.*”

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

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Loss and damage to ancient woodland and veteran trees

The Woodland Trust **objects** to the above planning application on the basis of impact to Gundymoor Wood (grid ref: SU6914507464), an Ancient Semi Natural Woodland / Plantation on Ancient Woodland Site designated on Natural England's Ancient Woodland Inventory (AWI), as well as direct loss of veteran trees.

The veteran field maple identified within H81 in the arboricultural survey is also recorded on the Ancient Tree Inventory (reference: 199011). G78 is also a group of trees containing veteran specimens as outlined in the consultee response by the Council's Arboricultural Officer (13/02/2020).

Policy

National Planning Policy Framework, paragraph 175 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 reasons⁵⁸ and a suitable compensation strategy exists;"

Footnote 58, 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.

The Council should also have regard for **Policy CS11** (Protecting and Enhancing the special Environment and Heritage of Havant Borough) of the Havant Borough Core Strategy (2011).

Impacts to ancient woodland

When land use is intensified such as in this situation, plant and animal populations are exposed to environmental impacts from the outside of a woodland. These can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

The Trust notes that one of the housing plots within the proposed development will be within close proximity to Gundymoor Wood. It is not clear from the details provided as to whether the ancient woodland has been afforded a buffer zone to the development. Without an appropriate buffer provided, the woodland is likely to be subject to detrimental impact.

Natural England's Standing Advice for ancient woodland and veteran trees states: *"Nearby development can also have an indirect impact on ancient woodland or veteran trees and the species they support. These can include:*

- *breaking up or destroying connections between woodlands and veteran trees*
- *increasing the amount of pollution, including dust*
- *increasing disturbance to wildlife from additional traffic and visitors*
- *increasing light pollution*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *changing the landscape character of the area*

The Trust is also concerned that trees which form the boundary between the ancient woodland and public areas can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.

Impact to veteran trees

It is essential that no trees displaying ancient/veteran characteristics are lost as part of the development. Any loss of veteran trees would be highly deleterious to the wider environment of veteran trees within close proximity, which may harbour rare and important species.

Natural England has also identified direct impacts of development on veteran trees including:

- *“damaging or destroying all or part of them (including their soils, ground flora, or fungi)*
- *damaging roots and understorey (all the vegetation under the taller trees)*
- *damaging or compacting soil around the tree roots”*

Mitigation

Natural England’s Standing Advice states: *“Mitigation measures will depend on the development but could include:*

- *improving the condition of the woodland*
- *putting up screening barriers to protect woodland or ancient and veteran trees from dust and pollution*
- *noise or light reduction measures*
- *protecting ancient and veteran trees by designing open space around them*
- *identifying and protecting trees that could become ancient and veteran trees in the future*
- *rerouting footpaths*
- *removing invasive species*
- ***buffer zones***

Buffering

This development should allow for a buffer zone of **at least 15 metres** to the ancient woodland, to avoid root damage and to allow for the effect of pollution from the development. The council should ensure that it is satisfied the width of the proposed buffer is adequate to protect the adjacent ancient woodland. A fence should be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles etc.

This recommendation is backed up by Natural England’s Standing Advice which states that *“you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.”*

For the veteran trees on site, these specimens should be afforded minimum root protection areas of 15 times the trunk diameter or 5 metres beyond the crown of the tree, whichever is greater. This is in line with Natural England’s Standing Advice.

Conclusion

The Woodland Trust **objects** to this planning application unless the applicant is able to retain all veteran trees on site, and both the veteran trees and ancient woodland are provided with suitable buffer zones in line with Natural England's Standing Advice.

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

Yours sincerely,

Nicole Hillier
Campaigner – Woods under Threat