

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

5th February 2019

Dear Ms Haywood,

Application: APP/18/00672

Proposal: Erection of 36no. dwellings with associated parking, access from Westwood Close, diversion of Havant Footpath 73, landscaping and surface water drainage. Felling and works to trees within Area A1, subject to TPO 2071. | Land off Westwood Close, Emsworth

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Loss and damage to veteran trees

The Woodland Trust **objects** to the development due to the potential loss and damage to four trees recorded as veterans on the Ancient Tree Inventory. The trees of concern are as follows:

- Veteran oak (grid reference: SU7531006994)
- Veteran oak (grid reference: SU7530506976)
- Veteran field maple (grid reference: SU7529306987)
- Veteran field maple (grid reference: SU7529806955)

Natural England's Standing Advice¹ 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.*"

Policy

National Planning Policy Framework, paragraph 175 states: "*When determining planning applications, local planning authorities should apply the following principles:*

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

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 should be refused on the grounds it does not comply with national planning policy.

Havant Borough Council's Pre-submission Local Plan, Policy E18 (Trees, Hedgerows and Woodland) states: *"Development affecting trees, hedgerows and woodlands will only be permitted where it:*

- A. Reflects, conserves or enhances the existing landscape and integrates the development into its surroundings, adding visual interest and amenity;*
- B. Adequately protects existing trees and hedgerows including their root systems prior to, during and after the construction process; and*
- C. Will not result in the loss or deterioration of ancient woodland and ancient or veteran trees.*

The Council will refuse planning permission for proposals that threaten the retention of important trees, hedgerows, and woodland, unless the need for, and benefits of development in that location clearly outweigh the impact of the proposal."

Impacts to veteran trees

Natural England has identified direct impacts of development on ancient woodland or 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*
- *polluting the ground around them*
- *changing the water table or drainage of woodland or individual trees*
- *damaging archaeological features or heritage assets "*

The Standing Advice then further 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

Trees are susceptible to change caused by construction/development activity. As outlined in Trees in relation to design, demolition and construction (BS 5837:2012), 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 the construction of a building. 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.

However Natural England's Standing Advice states that a buffer zone around an ancient or veteran tree should be **at least 15 times larger than the diameter of the tree**. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This is supported by the Ancient Tree Forum. The Council should be satisfied that the buffer zone proposed by the applicant is suitable.

Conclusion

To conclude, it is essential that no trees displaying ancient/veteran characteristics are lost or damaged 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.

Unless the applicants can ensure that the veteran trees subject to this development can be appropriately protected in line with Natural England's Standing Advice, the Woodland Trust **objects** to the following application.

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

Yours sincerely,


Campaigner – Ancient Woodland