



## Response to the Communities and Local Government consultation on the National Planning Policy Framework

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The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have three aims: to enable the creation of more native woods and places rich in trees; to protect native woods, trees and their wildlife for the future; and to inspire everyone to enjoy and value woods and trees. We own over 1,000 sites and have 300,000 members and supporters.

### Summary of Points

1. The National Planning Policy Framework (NPPF) should offer explicit protection for ancient woods and trees - both to build upon one of the most popular and effective components of PPS 9, *Biodiversity and Geological Conservation*, and to deliver on the Government's promise to increase the protection offered to ancient woodland as part of the debate over the future of the Public Forest Estate.
2. Increasing the low levels of woodland cover should also be identified as a priority for the NPPF as this is an aspiration supported by the public and across government as evidenced by the implementation of a National Tree Planting Campaign and the multitude of commitments to woodland creation given by the three main political parties both before the last general election and subsequent to the formation of the Coalition government.
3. Protecting the natural environment is passionately supported by local communities and therefore fits with the spirit of localism. At the time of writing over 160, 000 people had signed up to the Trust's campaigns to ensure protection for England's ancient forests' both as part of the debate around the future of the Public Forest Estate and in preparation for the consultation on the NPPF.
4. The NPPF needs to reinforce the ambitions of the forthcoming Natural Environment White Paper in regard to habitat protection, restoration and creation.

### What should be protected in the NPPF?

#### **Ancient woodland**

The NPPF being proposed by the Government should ensure that there is no reduction in the area of ancient woodland. This can be achieved by giving explicit, clearly defined and unqualified protection to ancient woodland. The previous policy, PPS 9, was influential in identifying ancient woodland protection as a priority for national and local government even though the caveats often undermined its application. Ancient woodland is our equivalent of the rainforest, covers a mere 2% of the land area and is enjoyed and valuable by local communities. Once lost ancient woodland cannot be recreated. As the recent consultation on the future of the Public Forest Estate in England noted, the



proposed NPPF, and the application of the planning system more generally, is crucial in guaranteeing the continued protection of our woodland heritage.

Regrettably ancient woodland is poorly served by the SSSI system (less than 15% is designated) meaning that PPS 9 has a significant role in protecting these woods. Moreover, the case for retaining the positive elements of PPS 9 is reinforced by the Government's commitment in Parliament to ensure that protection for woodland - and ancient woodland in particular - is increased by the reforms to the planning system.

### **Ancient and Veteran trees**

In the past planning policy has recognised the value of ancient and veteran trees. The NPPF should continue to afford these trees protection given their historic, cultural and wildlife value. At present an individual tree, or groups of trees of special interest - often identified by local communities - that are not within a conservation area or protected by a TPO may be easily lost. In order to empower local communities to protect their heritage trees the NPPF should include provision for the following:

- The creation of a National Register of Trees of Special Interest to highlight the most important trees to local communities so they can be prioritised for protection and care.
- Extending conservation areas so that designations can be made on the grounds of protecting trees in their own right and not simply because they are within an area of special architectural or historic interest.

### **Woodland creation**

By creating common standards and aspirations for accessible green space the NPPF can achieve meaningful linkages between policies on the natural environment such as the forthcoming Natural Environment White Paper with those of strategic planning. It could helpfully recommend that in assessing a community's needs, local authorities adopt Natural England's Accessible Natural Greenspace standard and the Woodland Trust's Woodland Access Standard (WAS<sub>t</sub>). The Natural England standard recommends that people living in towns and cities should have an accessible natural green space:

- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
- at least one accessible 20 hectare site within two kilometres of home;
- one accessible 100 hectare site within five kilometres of home; and
- one accessible 500 hectare site within ten kilometres of home; plus
- a statutory Local Nature Reserves at a minimum level of one hectare per thousand population.



In addition, the Woodland Access Standard developed by the Woodland Trust and adopted by the Forestry Commission could be included as an aspiration of national planning policy. This standard recommends that:

- no person should live more than 500 m from at least one area of accessible woodland of no less than 2 ha in size;
- that there should also be at least one area of accessible woodland of no less than 20 ha within 4km (8km round trip) of people's homes.

### **Evidence base**

Even though PPS 9 recognised the irreplaceable nature of ancient woodland, the habitat still remained under significant threat. In the last ten years the Trust has contested 400 cases involving 900 woodlands, which equates to around 26,000 hectares of ancient woodland - this is roughly an area the size of Birmingham. Without unequivocal protection many more of these heritage woods may be lost forever.

Our evidence does however demonstrate that the introduction of PPS 9 has helped ensure that ancient woodland protection is on the agenda of planning authorities and in certain cases the policy has prevented ancient woods from being destroyed. The removal of explicit protection for ancient woodland and ancient trees could lead to further unnecessary destruction at a time when the Government is promising to increase protection for woodland and bring forward a Natural Environment White Paper that will aim to tackle many contemporary environmental challenges.

### **Localism in action**

Caring for the natural environment is an agenda that many local communities care about passionately as evidenced by the amount of voluntary support the Woodland Trust receives through its WoodWatch initiative to contest cases where woodland is under threat from development. Woods and trees matter to people in a deeply personal way. Crucially, there is a strong moral case for people having greater influence over their local environment. As such the NPPF should empower local planning authorities to help their communities conserve the natural environment. This will in turn deliver the 'ecosystem services' that trees and woodland provide such as flood alleviation, aiding climate change mitigation and adaptation, tackling wildlife loss and improving public health.