

LOCAL PLAN

shape district



Publication Draft Representation Form 2014

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|-----------------------|
| For Official Use Only |
| Person ID: 132 |
| Rep ID: |

This consultation stage is a formal process and represents the last opportunity to comment on the Council's Local Plan and accompanying Sustainability Appraisal (SA) before it is submitted to the Secretary of State. All comments made at this stage of the process are required to follow certain guidelines as set out in the **Representation Form Guidance Notes** available separately. In particular the notes explain what is meant by legal compliance and the 'tests of soundness'.

This form has two parts:

- **Part A – Personal Details**
- **Part B – Your Representations**

If you are commenting on multiple sections of the document, you will need to complete a separate Part B of this form for each representation on each policy.

This form may be photocopied or alternatively extra forms can be obtained from the Council's offices or places where the plan has been made available (see the table below). You can also respond online using the Council's e-Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Please provide your contact details so that we can get in touch with you regarding your representation(s) during the examination period. Your comments (including contact details) cannot be treated as confidential because the Council is required to make them available for public inspection. If your address details change, please inform us in writing. You may withdraw your objection at any time by writing to Warwick District Council, address below.

All forms should be received by **4.45pm on Friday 27 June 2014**

To return this form, please deliver by hand or post to: **Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH**
or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Warwick District Council Offices, Riverside House, Milverton Hill, Royal Leamington Spa

Leamington Town Hall, Parade, Royal Leamington Spa

Warwickshire Direct Whitnash, Whitnash Library, Franklin Road, Whitnash

Leamington Spa Library, The Pump Rooms, Parade, Royal Leamington Spa

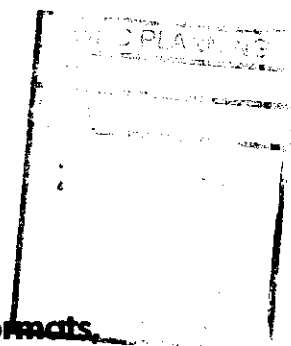
Warwickshire Direct Warwick, Shire Hall, Market Square, Warwick

Warwickshire Direct Kenilworth, Kenilworth Library, Smalley Place, Kenilworth

Warwickshire Direct Lillington, Lillington Library, Valley Road, Royal Leamington Spa

Brunswick Healthy Living Centre, 98-100 Shrubland Street, Royal Leamington Spa

Finham Community Library, Finham Green Rd, Finham, Coventry



Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

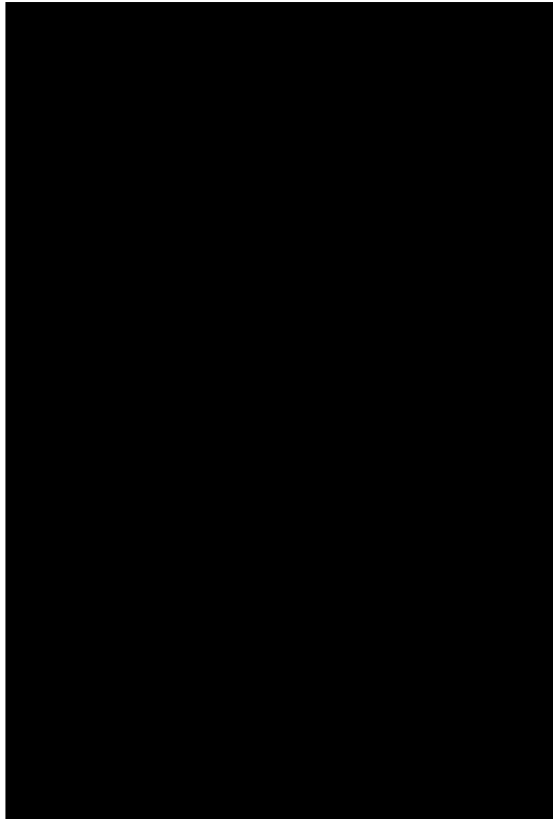
Part A - Personal Details

1. Personal Details*

2. Agent's Details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in section 2.

Title
First Name
Last Name
Job Title (where relevant)
Organisation (where relevant)
Address Line 1
Address Line 2
Address Line 3
Address Line 4
Postcode
Telephone number
Email address



3. Notification of subsequent stages of the Local Plan

Please specify whether you wish to be notified of any of the following:

The submission of the Local Plan for independent examination

Yes No

Publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan

Yes No

The adoption of the Local Plan.

Yes No

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Person ID:

Rep ID:

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Paragraph Number:

Policy Number:

CC1 PLANNING FOR CLIMATE CHANGE ADAPTATION

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

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Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

SEE APPENDIX 1 (attached)

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ADD THE WORD "TREE" BEFORE
THE WORD "PLANTING" IN SUB-PARA
~~2~~ (6).

THIS WILL ENABLE THE LOCAL PLAN
TO COMPLY WITH NATIONAL PLANNING
POLICY.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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APPENDIX 1

CC1 Planning for Climate Change Adaptation

We are pleased to see the reference to 'planting' in this Policy –

optimising the use of multi-functional green infrastructure (including water features, green roofs and planting) for urban cooling, local flood risk management and to provide access to outdoor space for shading, in accordance

but we would like to see the reference specifically mention **tree** planting in the bracketed wording.

Trees and woodland can make a significant contribution to climate change mitigation and adaptation in sub-para (b).

Urban heat island: Trees and woods can reduce the impact of the 'urban heat island effect' which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. Dramatic summer temperature differences of as much as 10°C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4°C.

(Handley, J and Carter, J (2006) Adaptation strategies for climate change in the urban environment, Draft final report to the National Steering Group, Centre for urban and regional ecology, University of Manchester
www.sed.manchester.ac.uk/research/cure/downloads/asccue_final_report_national_steering_group.pdf).

Air quality: Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources – such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). The Woodland Trust has just published a report on how trees can specifically help improve air quality – see <http://www.woodlandtrust.presscentre.com/Media-Library/Air-Quality-report-77a.aspx>.

Flood amelioration: The Woodland Trust 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. They 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 **Woodland actions for biodiversity and their role in water management** (pdf) - <https://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf> .

In addition, a joint Environment Agency/Forestry Commission publication **Woodland for Water: Woodland measures for meeting Water Framework objectives** states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives' (Environment Agency, July 2011-
<http://www.forestry.gov.uk/fr/woodlandforwater>).

The Government's **Independent Panel on Forestry** (Defra, Final Report, July 2012) has emphasised these benefits by stating that:

'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition

*of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures'. This has been endorsed by the response in the recent **Government Forestry Policy Statement** (Defra Jan 2013) with the key objective (p.23) '*Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity*', together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.*

Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, ***The Case for Trees in development and the urban environment*** (Forestry Commission, July 2010), explains how: *'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.*

Trees can reduce the likelihood of surface water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (*Using green infrastructure to alleviate flood risk, Sustainable Cities - www.sustainablecities.org.uk/water/surface-water/using-gi/*)

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination ✓

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

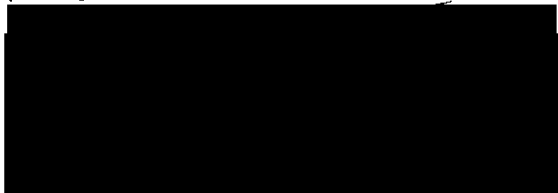
Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:



18/6/14

Date :

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Rep ID:

Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Paragraph Number:

Policy Number: FW 2 SUSTAINABLE URBAN DRAINAGE

Policies Map Number:

5. Do you consider the Local Plan is :

- | | | | |
|---|-----|-------------------------------------|--|
| 5.1 Legally Compliant? | Yes | <input checked="" type="checkbox"/> | No |
| 5.2 Complies with the Duty to Co-operate? | Yes | <input checked="" type="checkbox"/> | No |
| 5.3 Sound? | Yes | | No <input checked="" type="checkbox"/> |

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

SEE APPENDIX 2 (attached)

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

WE WOULD LIKE TO SEE THIS POLICY
ADD THE WORDS "SUCH AS NATIVE
WOODLANDS" TO SUB-PARA (d)
(PROVIDE GOOD QUALITY OPEN SPACE)

THIS WILL THEN ENABLE THE LOCAL PLAN
TO COMPLY WITH NATIONAL PLANNING POLICY.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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APPENDIX 2

FW2 Sustainable Urban Drainage

We would like to see a reference to the role that trees and woods can play in helping to solve water quality and flow issues.

The Woodland Trust 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. They 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 ***Woodland actions for biodiversity and their role in water management*** (pdf) - <https://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf> .

In addition, a joint Environment Agency/Forestry Commission publication ***Woodland for Water: Woodland measures for meeting Water Framework objectives*** states clearly that: *'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives'* (Environment Agency, July 2011- <http://www.forestry.gov.uk/fr/woodlandforwater>).

The Government's **Independent Panel on Forestry** (Defra, Final Report, July 2012) has emphasised these benefits by stating that:

'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures'. This has been endorsed by the response in the recent **Government Forestry Policy Statement** (Defra Jan 2013) with the key objective (p.23) *'Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity'*, together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.

Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, ***The Case for Trees in development and the urban environment*** (Forestry Commission, July 2010), explains how: *'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'*.

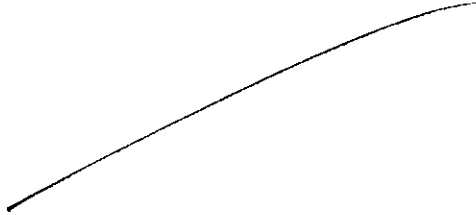
Trees can reduce the likelihood of surface water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. (*Using green infrastructure to alleviate flood risk, Sustainable Cities* - www.sustainablecities.org.uk/water/surface-water/using-gi/)

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination ✓

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



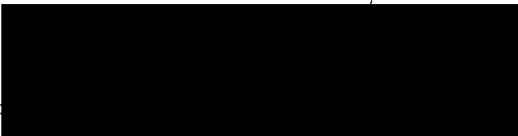
Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed



Date :

18/6/14

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Paragraph Number:

Policy Number:

NE2 PROTECTING DESIGNATED BIODIVERSITY AND GEODIVERSITY

Policies Map Number:

5. Do you consider the Local Plan is :

5.1 Legally Compliant?

Yes No

5.2 Complies with the Duty to Co-operate?

Yes No

5.3 Sound?

Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

Positively Prepared:

Justified:

Effective:

Consistent with National Policy:

For Official Use Only

Person ID:

Rep ID:

7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

SEE APPENDIX 3 (attached)

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

WE WOULD LIKE TO SEE :-

(A) THE COMMENT ABOUT "THE BENEFITS OF DEVELOPMENT CLEARLY OUTWEIGH THE NATURE CONSERVATION VALUE"... REMOVED IN RESPECT OF ANCIENT WOODLAND, AGED & VETERAN TREES.

(B) WE WOULD LIKE TO SEE THE POLICY OR SUPPORTING TEXT REFERENCE THE FORESTRY COMMISSION'S "STANDING ADVICE ON ANCIENT WOODLAND".

Continue on a separate sheet if necessary

(C) WE WOULD LIKE TO SEE THE POLICY OR SUPPORTING TEXT COMMIT TO PRODUCTION OF A TREES + WOODLAND SPD.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

THIS WILL THEN ENABLE THE LOCAL PLAN TO COMPLY WITH NATIONAL PLANNING

POLICY

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Rep ID:

APPENDIX 3

NE2 Protecting Designated Biodiversity and Geodiversity Assets

We are pleased to see the reference to ancient woodland and ancient trees in this policy. We should point out that

1. The **Government Forestry Policy Statement** (Defra Jan 2013) reinforces the requirement for **absolute** protection of ancient woodland: *'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'. 'Keepers of Time'* (Defra/Forestry Commission, 2005, p.10) states: *'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'*.
2. The Forestry Commission has published its **Standing Advice with Natural England on Ancient Woodlands and Veteran Trees** (Forestry Commission, April 2014) and its associated **Assessment Guide** ([http://www.forestry.gov.uk/pdf/FCNEAWSAAssessmentGuideFinalJune2014.pdf/\\$FILE/FCNEAWSAAssessmentGuideFinalJune2014.pdf](http://www.forestry.gov.uk/pdf/FCNEAWSAAssessmentGuideFinalJune2014.pdf/$FILE/FCNEAWSAAssessmentGuideFinalJune2014.pdf)), specifically designed to help Local Planning Authorities process the required protection for ancient woodland and ancient trees. We would like to see this referenced to this Policy.
3. Ideally protection of ancient woodland and expansion of native woodland should be covered by a dedicated Trees & Woodland SPD, and we would like to see a commitment in the Local Plan to producing this.

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination ✓

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

[Handwritten mark]

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

[Redacted signature]

Date :

15/6/14

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

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Part B - Your Representations

Please note: this section will need to be completed for each representation you make on each separate policy.

4. To which part of the Local Plan or Sustainability Appraisal (SA) does this representation relate?

Local Plan or SA:

Paragraph Number:

Policy Number: **NE3 Biodiversity**

Policies Map Number:

5. Do you consider the Local Plan is :

- 5.1 Legally Compliant? Yes No
- 5.2 Complies with the Duty to Co-operate? Yes No
- 5.3 Sound? Yes No

6. If you answered no to question 5.3, do you consider the Local Plan and/or SA unsound because it is not: (please tick that apply):

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

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7. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

SEE APPENDIX 4 (Attached)

Continue on a separate sheet if necessary

8. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 7. above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

AMEND SUB PARA (G) TO READ (underlined alterations)

"PROTECT OR ENHANCE AND EXPAND BIODIVERSITY ASSETS SUCH AS NATIVE WOODLAND"

THIS WILL COMPLY WITH NATIONAL PLANNING POLICY.

Continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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APPENDIX 4

NE3 Biodiversity

Whilst we are pleased to see sub-paragraph (b) referring to enhancement of biodiversity assets, we would like this Policy to specifically include a reference to **expanding** biodiversity assets like native woodland.

Tree planting can deliver a wide range of benefits for local communities, in both a rural and urban setting, and this is strongly supported by current national planning policy. The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication **Woodland Creation – why it matters** <http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodandCreati onbro.pdf>. These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).

We also consider that the Council has a statutory duty to protect trees and promote tree planting. **Section 197 of the Planning Act (1990)** states:

197. Planning permission to include appropriate provision for preservation and planting of trees.

'It shall be the duty of the local planning authority – to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees'.

The **National Planning Policy Framework (NPPF)** also supports the need for more habitat creation by stating that: *'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*, (DCLG, March 2012, para 114). Also para 117 states that: *'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.*

The new **England Biodiversity Strategy which** makes it clear that expansion of priority habitats like native woodland remains a key aim - *'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England'*, (*Biodiversity 2020: A strategy for England's wildlife and ecosystems services*, DEFRA 2011, p.26).

A reading of these two policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this new Plan.

Woodland creation also forms a significant element of the **Government Forestry Policy Statement** (Defra Jan 2013): *'We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We*

want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity'.

We note Policy CT5 which provides for infrastructure contributions to Meeting Places, Cultural facilities etc. We would like to see a similar commitment to infrastructure contributions for green infrastructure like tree planting.

We would also like to see the wide benefits of woodland creation covered by a dedicated Trees & Woodland SPD, and we would like to see a commitment in the Local Plan to producing this.

A good example of positive woodland Local Plan policy can be found in the **Solihull Local Plan (adopted Dec 2013)**

Policy P10 Natural Environment

The Council will seek to protect, enhance and restore the diverse landscape features of the Borough and to create new woodlands and other characteristic habitats, so as to halt and where possible reverse the degrading of the Arden landscape and promote local distinctiveness. Development should take full account of national and local guidance on protecting and restoring the landscape and the areas in need of enhancement, including guidance relating to the countryside. Developers will be expected to incorporate measures to protect, enhance and restore the landscape, unless it is demonstrated that it is not feasible, disproportionate or unnecessary.

The Council will seek to conserve, enhance and restore biodiversity and geodiversity, to create new native woodlands and other habitats and to protect, restore and enhance ancient woodland and green infrastructure assets across the Borough. Protection of ancient woodland, designated sites and priority habitats shall include the establishment of buffers to any new development. Development should be informed by the latest information on habitats and species, and take full account of national and local guidance on conserving biodiversity, opportunities for biodiversity enhancement and for improving and restoring the Borough's green infrastructure.

(supporting text)

10.4.3 An integrated approach to the conservation of natural ecosystems will be sought, based on the Landscapes for Living initiative, so as to contribute to targets to halt and reverse biodiversity loss, and to deliver economic and social benefits for Solihull's residents and businesses. New development should incorporate biodiversity conservation through good design. Developers will be expected to use national guidance on the provision of buffers between development and any ancient woodland, designated site or priority biodiversity action plan habitat. Where development is within 500 metres of woodland recorded in Natural England's Ancient Woodland Inventory, the Forestry Commission will be consulted.

Policy P14 Amenity

Safeguard important trees, hedgerows and woodlands, encourage new and replacement tree and hedgerow planting and identify areas that may be suitable for the creation of new woodlands. Priority will be given to locations that enhance or restore the green infrastructure network and to the planting of species characteristic of the Arden Warwickshire landscape;

(supporting text)

10.12.4 The policy recognises the importance of protecting and increasing trees and woodlands for amenity and other benefits, such as the enhancement or restoration of the Arden landscape, green infrastructure, conservation of biodiversity, informal

recreation, and to address the impacts of climate change. Important trees, hedgerows and woodlands will include those covered by tree preservation orders, veteran trees or those with potential to be veteran trees, features characteristic of the Arden landscape or included in national or local biodiversity action plans, and trees and hedgerows covered by regulations or best practice guidance, such as the Hedgerow Regulations and the British Standard for trees and construction. Policy on conserving the landscape and biodiversity, including the protection of ancient woodlands in the Borough, is contained in Policy P10.

9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination ✓

Yes, I wish to participate at the oral examination

10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(A large handwritten checkmark is present in this area.)

Continue on a separate sheet if necessary

Please note: This written representation carries the same weight and will be subject to the same scrutiny as oral representations. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

11. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

(Redacted signature area)

Date :

18/6/14

Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998.

For Official Use Only

Person ID:

Rep ID: