

Smith, Kate

From: campaigning@woodlandtrust.org.uk
Sent: 04 February 2019 15:10
To: Planning Department
Cc: campaigning@woodlandtrust.org.uk
Subject: FAO Nigel Smith - Woodland Trust comments on application OUT/2019/0022
Attachments: Mimecast Attachment Protection Instructions; Pikehorne Wood - Woodland Trust comments on application OUT-2019-0022.pdf

Categories: Consultation Responses

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Dear Mr Smith,

Thank you for the opportunity to comment on the above consultation. Please find attached the Woodland Trust's comments.

If you wish to discuss any of the points raised, please do not hesitate to get in touch.

Kind regards,
Nicole Hillier

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Campaigner - Ancient Woodland

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Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

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Stand up for trees

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Coventry City Council
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4th February 2019

Dear Mr Smith,

Application: OUT/2019/0022

Proposal: Outline application for the demolition of all existing buildings and the erection of up to 550 dwellings and creation of associated vehicular accesses to Tamworth Road and Fivefield Road, pedestrian/cycle and emergency accesses, diversion of public rights of way, highway improvements to Fivefield Road, parking, landscaping, drainage features, open space and associated infrastructure, with all matters to be reserved except access points into the site. | Land at Fivefield Road and Tamworth Road Keresley Coventry

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.

Ancient Woodland

Natural England 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.

Damage to ancient woodland

The Woodland Trust **objects** to the planning application on the basis of deterioration and disturbance to Pikehorne wood (grid ref: SP308841) and The Alders (grid ref: SP310840) designated as Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory (AWI) and part of the Pikehorne Wood, Keresley Mere and The Alders Local Wildlife Site (LWS).

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

Coventry City Council's adopted Local Plan, Policy GE3: Biodiversity, Geological, Landscape and Archeological conservation states: *"Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:*

- A. lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;*
- B. protect or enhance biodiversity assets and secure their long term management and maintenance;*
- C. avoid negative impacts on existing biodiversity; and*
- D. preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans."*

Also Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles: *"In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:*

- iv. Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east;"*

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. In particular, the habitats become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

Natural England's Standing Advice for Ancient Woodland and Veteran Trees¹ 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*
- *reducing the amount of semi-natural habitats next to ancient woodland and other habitats*
- *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"*

Related to this application the Woodland Trust's concerns focus on:

- Development provides a source of non-native plants and aids their colonisation;
- Where the wood edge overhangs public areas, branches and even whole trees can be indiscriminately lopped/felled, causing reduction of the woodland canopy.
- There can be changes to the hydrology altering ground water and surface water quantities.
- Temporary works resulting from the proposals may cause long term damage.

Mitigation

Natural England's Standing Advice 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

This development should allow for a buffer zone of **at least 50 metres** to avoid root damage and to allow for the effect of pollution from the development. The buffer should be planted before construction commences on site, and a fence should also be put in place during construction to ensure that the buffer area does not suffer from encroachment of construction vehicles/stockpiles etc.

This 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."*

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

By using the 15m alluded to in the NE Standing Advice, the applicant does not appear to have tailored the proposed buffer specifically for the proposed operations at this site. The council should ensure that it is satisfied the width of the proposed buffer is adequate to protect the adjacent ancient woodland.

Conclusion

In summary, the Woodland Trust **objects** to this planning application unless the applicant can provide an appropriate buffer to the development, taking into consideration the scale of the proposed scheme and the impact to the ancient woodlands.

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

Yours sincerely,

Nicole Hillier
Campaigner – Ancient Woodland