

16 March 2020

Dear Sir/Madam,

Greater Norwich Local Plan Stage C Regulation 18 Draft Strategy and Site Allocations

The Woodland Trust appreciates the opportunity to comment on the GNLP Sites Plan.

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

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. We aim to prevent damage, fragmentation and loss of these finite irreplaceable sites.

Natural England's standing advice for Ancient Woodland and Veteran Trees¹ states: *"Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It's important for its wildlife (which include rare and threatened species), soils, recreational value, and cultural, historical and landscape value."*

The Trust is concerned about site allocation **GNLP0132** (Land off Blue Boar Lane/Salhouse Road White House Farm) which has been included in the GNLP Sites Plan, as this could lead to the damage of an ancient woodland known as Bulmer Coppice.

Planning 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 *"For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and*

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-reduce-or-compensate-for-the-impacts>

hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”

Impacts on ancient woodland

When land use is changed to a more intensive use such as in this situation, plant and animal populations are exposed to environmental impacts from outside of the woodland. In particular, the habitats will become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These detrimental edge effects can result in changes to the environmental conditions within the woodland and consequently affecting the wood's stable conditions. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.

Natural England's standing advice for Ancient Woodland and Veteran Trees states: *“Nearby development can also have an indirect impact on ancient woodland or ancient and veteran trees and the species they support. These can include:*

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

The standing advice goes on to recommend *“For ancient woodlands, 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.”*

Site allocation **GNLP0132** is identified for large scale development, and as such the minimum 15m buffer recommendation would not be effective in ensuring that the ancient woodland within the site is not affected by potential future development. The Trust would generally recommend a 50 metre buffer to the ancient woodland for a development of this scale, subject to detailed proposals including site layout.

Conclusion

The Trust is concerned about the potentially adverse impacts that the proposed site allocation **GNLP0132** will have in relation to an area of ancient woodland known as Bulmer Coppice. Ancient woodland should not be included in areas that are allocated for development, whether for residential, leisure or community purposes as this leaves them open to the impacts of development.

The Woodland Trust **objects** to the inclusion of this site allocation in the GNLP Sites Plan, as it is likely to cause damage to an area of ancient woodland within its boundaries. For this

reason we believe the site is **unsound and should not be taken forward**. Secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

We hope you find our comments to be of use to you. The Woodland Trust is happy to provide any additional information or support regarding the protection of ancient woodland.

If you require any further information regarding points raised within this document, then please do not hesitate to contact us.

Yours sincerely,

Isla King
Assistant Campaigner – Ancient Woodland

Site reference name	Nearest Town	Development description	Woodland adjacent or within?	Type of woodland affected (e.g. ASNW, PAWS, secondary) & grid reference
GMLP0132	Sprowston	Housing: 1,200 dwellings	Within	Bulmer Coppice PAWS TG27341187