



Kempton Way,
Grantham,
Lincolnshire,
NG31 6LL

Crawley Local Plan Submission Draft Reg 19 Consultation

June 2023

Response from the Woodland Trust

The Woodland Trust is the UK's leading woodland conservation charity and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK, covering over 23,580 hectares, and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees, and the benefits and value that they deliver for climate, nature, and society.

We welcome the opportunity to comment on the Crawley Local Plan Submission Draft.

Note: we consider all the policies to be legally compliant and sound unless otherwise stated in the response.

Policy SD1 Sustainable Development

We welcome this policy, in particular point 1) the priority given to Crawley's commitment to being carbon neutral by 2050 and point 4) protecting and enhancing green infrastructure and biodiversity.

Policy DD1: Normal Requirements of All New Development

We welcome the policy in DD1 g) that existing trees, green spaces, and hedges should be integrated, protected, and enhanced in new developments, to retain existing trees that contribute positively to the area and allow sufficient space for trees to reach maturity.

Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity, and integrating trees and green spaces into developments early in the design process reduces the risk of tree removal. We recommend the guidance published by the Woodland Trust *Residential developments and trees - the importance of trees and green spaces* (January 2019).

We welcome the commitment in para 5.15 that where trees are unavoidably lost through development, these losses should be mitigated by new planting, as set out in detail in policy DD4.

Policy DD4: Tree Replacement Standards

We welcome the clear policy in DD1 in support of tree retention, with removal and replacement as a last resort. We strongly welcome the proposed ratio of tree replacement in policy DD4, which reflects the Woodland Trust guidance *Local Authority Tree Strategies (July 2016)* with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.

We strongly welcome the guidance in para 5.37 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.

Policy GI1: Green Infrastructure

We welcome this policy, in particular the requirement in point ix) that where possible, Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used to assess a development proposal's location in relation to existing accessible natural green space and woodland.

We welcome the requirement in point vii) that large development proposals will be required to provide new and/or create links to green infrastructure, as well as take into consideration the use of SuDS in line with Policy EP1.

Policy GI2: Biodiversity Sites

We strongly support the policy that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as a last resort compensated then planning permission should be refused.

We support the policy point 3) that 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 reasons and a suitable compensation strategy exists, reflecting the National Planning Policy Framework (NPPF) 2021 (paragraph 180c).

We strongly welcome the guidance in 14.22 that ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland.

We welcome the recognition of the unique value of ancient woodland in 14.23 and guidance that a larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

We strongly welcome the guidance in 14.23 that where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with the loss of this irreplaceable habitat, and that where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.

This reflects the guidance in the Trust's *Planners' Manual for ancient woodland (2019)*.

Policy GI3: Biodiversity and Net Gain

We welcome the requirement in this policy for at least one new tree, or equivalent soft landscaping, for each new dwelling and that these requirements would normally be expected to be met within the development site.

We support the policy that proposals which would result in significant harm to biodiversity will be refused unless: i. this can be avoided by locating the development on an alternative part of the site with less harmful impact; or ii. the harm can be adequately mitigated, or, as a last resort, compensated for.

We note and welcome the guidance in 14.42 that replacement trees (Policy DD4) will not count towards biodiversity net gain.

We strongly welcome the guidance in 14.43 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.

We strongly welcome the guidance in 14.44 that when landscaping schemes are proposed in lieu of on-site new tree planting, the planting scheme should be agreed with the council and must be justified on a case-by-case basis, considering the multiple benefits provided by trees.

Policy OS2: Provision of Open Space and Recreational Facilities

We welcome this policy, in particular the reference in 7.23 to applying Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.

Policy GAT2: Safeguarded Land

The policy should ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.

We are concerned that the proposed area includes the following ancient semi-natural woodlands (ANSW):

- Allen's Wood ASNW (Grid reference: TQ3003540208)
- Huntsgreen Wood ASNW (Grid reference: TQ2828540024)
- Horleyland Wood ASNW (Grid reference: TQ2898240539)
- Rowley Wood ASNW (Grid reference: TQ2791939226)
- Unnamed ASNW at TQ2955640750

In addition, we are concerned about the proximity of the site to

- Black Corner Wood ASNW (Grid reference: TQ2996939934).

We consider that this policy is **not legally compliant or sound** unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.

Policy GAT3: Gatwick Airport Related Parking

We seek clarification of this policy to confirm that any future car parking provision within the airport site would not be allowed in harmful proximity to areas of ancient woodland or veteran trees. As noted in our comments on policy GAT1, the land safeguarded for future airport development includes several areas of ancient semi-natural woodlands (ANSW).

- Allen's Wood ASNW (Grid reference: TQ3003540208)
- Huntsgreen Wood ASNW (Grid reference: TQ2828540024)
- Horleyland Wood ASNW (Grid reference: TQ2898240539)
- Rowley Wood ASNW (Grid reference: TQ2791939226)
- Unnamed ASNW at TQ2955640750

The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in land to be used for carparking within the area safeguarded for future airport development. Even if the argument were to be made that the runway itself is "wholly exceptional" development as set out in the NPPF para 180c, car parking is not.

We consider that this policy is **not legally compliant or sound** unless these areas of ancient woodland are excluded from any future development sites, with an appropriate buffer specified.

Policy H2: Key Housing Sites

In line with policy GI2, and the NPPF para 180c, development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.

We object to the allocation of land for housing that includes the following ancient semi-natural woodlands (ANSW):

- Black Corner Wood ASNW (Grid reference: TQ2996939934)
- Black Corner Wood ASNW (Grid reference: TQ2980139854)
- Black Corner Wood ASNW (Grid reference: TQ2971939604)
- Titchmeres Wood ASNW (Grid reference: TQ2957539239)
- Forge Wood ASNW (Grid reference: TQ2964738891)
- Unnamed ASNW at TQ2965338714
- Unnamed ASNW at TQ2984538749
- The Birches ASNW (Grid reference: TQ2921138575)
- Tinslow Shaw / Mine Pit Wood ASNW (Grid reference: TQ2901638590)
- Unnamed ASNW at TQ2900238628.

In addition, we are concerned about the proximity of the site allocations to

- Summersveres Wood (Grid reference: TQ2868538572) and to
- Tilgate Forest & Lodge ASNW (Grid reference: TQ2704334553).

The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran, and notable trees outside woods) across any sites allocated or proposed to be allocated for development, to comply with the requirements of the NPPF 2021 (paragraph 180c) for the protection of irreplaceable habitats.

We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it even more important that vital protections for ancient woodland and veteran trees are upheld.

We consider that this policy is **not legally compliant or sound** unless these areas of ancient woodland are excluded from any future development sites, with appropriate buffers specified, in line with para 14.23 of the draft plan.

Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link

We welcome the confirmation in 17.24 that new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Greenspace would be wholly unacceptable, given the impact this would have on ancient woodland. However, we are concerned that the search area for the proposed link road still includes ancient woodland at Rowley Wood ASNW (grid reference: TQ2791939226) and unnamed ancient woodland east of Bonnetts Lane.

The Ancient Tree Inventory (ATI) for the area may be incomplete. We therefore recommend an exercise to complete the ATI (which lists ancient, veteran, and notable trees outside woods) across any sites allocated or proposed to be allocated for development, to comply with the requirements of the NPPF 2021 (paragraph 180c) for the protection of irreplaceable habitats.

We consider that this policy is **not legally compliant or sound** unless these areas of ancient woodland are excluded from any future development sites, with appropriate buffers specified.

We propose modifying the policy under ST4 a) adding the words “and protected biodiversity sites” so that the policy reads: *The design and route ... must take account of a. its impact on (but not limited to): local biodiversity and protected biodiversity sites...* This would better reflect local plan Policy G12.

Thank you for the opportunity to comment on this submission draft. We would be happy to meet with you to discuss these issues further.

Bridget Fox
Regional External Affairs Officer - South East