

I am responding on behalf of the Woodland Trust, which 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. The Trust is recognised as a national authority on woods and trees, and a protector of the benefits and value that they deliver for climate, nature and society.

Question 2.8 *Does criterion xi) at paragraph 12.23 need to be amended to ensure consistency with national planning policy at NPPF paragraph 180c) which caveats the loss or deterioration of irreplaceable habitats with “unless there are wholly exceptional reasons, and a suitable compensation strategy exists”?*

Criterion xi) seeks to summarise a number of Crawley plan policies to reflect the LPA’s aspirations for sites in neighbouring authorities, and is therefore inevitably concise. It might be helpful to include reference to the more detailed policies (GI3, H3f, DD4) which this criterion reflects.

We would accept the addition of the NPPF wording at this point, provided the other elements of the criterion are retained, with wording as follows:

*“Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development’s construction **unless there are wholly exceptional reasons, and a suitable compensation strategy exists.** Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided;”*

Question 5.9 *Would it be necessary for plan soundness to amend part iii) of Policy GAT1 to replace ‘like for like’ compensation with ‘fair’ compensation in relation to biodiversity?*

Retaining the objective measure of ‘like for like’ is sounder than the subjective measure of ‘fair’. In the context of BNG, like for like should be the minimum standard, so it is hard to see what benefit there could be for replacing that with ‘fair’.

Question 6.3 *Has appropriate regard been given to any ancient woodland or trees within or in close proximity to these sites in terms allocating these sites and assessing their capacity? Would sufficient protection be provided for by Policy GI2? Would it be necessary for soundness to de-allocate or amend the capacity of any H2 sites to account for ancient woodland so as to comply with NPPF paragraph 180c?*

The broad allocation of sites without detailed site briefs makes it difficult to determine whether sufficient protection is provided. We would recommend a that ancient woodland is always excluded from sites allocated for development and that a buffer, ideally of 50m, be designated to protect ancient woodland from adjacent development. Such a buffer zone can provide part of the amenity land and/or biodiversity net gain from the development and so make a positive contribution to delivering the local plan. Further information is available in the Trust’s [Planners’ Manual for Ancient Woodland](#).

Question 10.13 *Is the wording of Policy ST4 sufficiently robust to ensure any route and its design takes account of environmental assets including, but not limited to, ancient trees/woodland not yet identified in any recognised inventory and proximate protected sites such as Local Green Space, Local Wildlife Sites and Local Nature Reserves?*

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) which is a designated Local Wildlife Site.

We propose modifying the policy to expand the criterion “local biodiversity” under ST4 a) adding the words “and protected biodiversity sites” so that the policy reads: *The design and route of the Western Link Road 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 GI2 and the NPPF para 180(c).

Best wishes,

Bridget