

North Dorset Community Infrastructure Levy Draft Charging Schedule

- Draft Regulation 123 List

June 2016

Woodland Trust comments

Draft Regulation 123 List - Section 2.1 table 'Open space provision, amenity and environmental improvements' heading

We would like to see this heading 'box' include a reference to woods and trees for all the benefits they deliver for green infrastructure and environmental improvements.

DCLG has now published revised (February 2016) green infrastructure planning guidance as part of the national Planning Practice Guidance (PPG), which confirms that woodland and street trees should form part of green infrastructure provision -

"Natural Environment

Green Infrastructure

What is green infrastructure?

Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls."

The Woodland Trust believes that trees and woods can deliver a wide range of green infrastructure benefits for placemaking 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/4117WoodandCreationbro.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 in an Open Space Study. **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'.

We would therefore like to see this heading box amended to read (upper case amendments) -

“Open space provision, amenity and environmental improvements (including publicly accessible open space, allotments, nature reserves, TREES AND WOODLAND and Dorset Heathlands mitigation projects)”.

Draft Regulation 123 List - Section 2.1 table 'Public realm enhancements' heading

We would like to see similar wording to that proposed in Cheltenham Borough Council's **Public Realm, Art and Culture** Regulation 123 heading box, which reads –

- *Off-site provision, enhancements and management including tree planting, wider environmental enhancements, street furniture and signage. Interpretation of arts and culture in line with Cheltenham public arts strategy and tourism strategy.*

This would fit with national policy on trees and woodland in the public realm - woodland creation 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’*.

As an example of local authority planning policy, **Bristol Central Area Plan - Adopted March 2015** sets out that

1. Vision: Bristol City Centre in 2026

By 2026...

*viii. Inspired by Bristol's status as European Green Capital 2015, the city centre will become a **cleaner, greener and healthier** place to live, work and visit through more sustainable transport, the planting of trees, urban greening and high standards of sustainable design and construction in new buildings. New development will provide more **family homes** and **flexible business space** suitable for small businesses, to create a more **successful, vibrant and diverse** mixed-use city centre that is open to all.*

6.13 Given the tight urban grain and high density of development within the city centre and the ambitious levels of growth proposed for the area by the Core Strategy, the opportunities for additional major green infrastructure assets are limited. It is therefore important to integrate green infrastructure within new development to enhance and reinforce the area's existing green infrastructure assets. This may include tree planting and the creation of green roofs. Opportunities for new green

infrastructure are likely to be greatest in those areas of the city centre where more significant change is proposed.

6.14 The overall approach will be to create, protect, enhance and manage a network of multifunctional green infrastructure within central Bristol to support and strengthen the strategic green infrastructure network. This will happen through a series of interventions ranging from new green spaces to increased tree planting and building integrated solutions such as living walls and roofs.

Policy BCAP25: Green infrastructure in city centre developments

To reduce the impact of overheating and surface water run-off, new development in Bristol City Centre will be expected to include an element of green infrastructure where possible as an integral part of its design. This should include both the landscaping of outdoor areas and building integrated solutions.

Development will be expected to incorporate as many as possible of the following design features:

Green roofs and roof gardens;

Living walls;

Street trees and other trees;

Water features linked to SUDS;

Waterside landscaping where appropriate

We would therefore like to see tree planting and street trees reflected in the 'Public realm enhancement' heading box.

**Draft Regulation 123 List - Section 2.1 table
'Surface water, flood risk and water quality mitigation works' heading**

We would like to see a reference in this heading 'box' to the role that the natural environment can play for flood and water management, specifically woods and trees. 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/100263208/rr-wt-71014-woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf?cb=001108c3a78944299140a996b2cd7ee8>.

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 **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, 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/).

The Woodland Trust has produced a policy paper illustrating the benefits of trees for urban flooding – **Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity** (<https://www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf>).

In rural areas, integrating trees into farming systems can improve water quality and help mitigate flooding, while also supporting production, as set out in the Woodland Trust's paper **Planting Trees to Protect Water – The role of trees and woods on farms in managing water quality and quantity** - <https://www.woodlandtrust.org.uk/publications/2012/08/planting-trees-to-protect-water/>.

We would therefore like to see the wording in the 'Surface water, flood risk and water quality mitigation works' heading box amended to (upper case amendments) – "Provision of surface water and flood risk mitigation works which are directly related to a development (including the Gillingham Strategic Site Allocation (SSA)) SUCH AS TREES AND WOODLAND or where the requirement can be attributed to five or fewer developments.

For further information please contact:

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