



Planning Department
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

29th September 2017

Dear Sir/Madam

Warrington Borough Council Local Plan – Preferred Development Option Consultation

The Woodland Trust appreciates the opportunity to comment on the Local Plan - Preferred Development Option.

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 1,250 sites across the UK, covering around 23,000 hectares (57,000 acres) and we have 500,000 members and supporters.

The proposed preferred development option would result in development sited directly adjacent to two Woodland Trust-owned sites Lumb Brook Valley (grid ref: SJ627849) and Grappenhall Heys (grid ref: SJ627858). A proposed country park would also incorporate the Woodland Trust's Grappenhall Wood site (SJ641858).

Due to potential adverse impacts on the aforementioned sites the Woodland Trust **objects** to this Preferred Development Option.

Lumb Brook Valley

Lumb Brook Valley is designated as Ancient Semi-Natural Woodland (ASNW) on Natural England's Ancient Woodland Inventory. As such, the following Planning Policy applies:

National Planning Policy Framework, Paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

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Natural England's standing advice for Ancient Woodland and Veteran Trees¹ states: "Trees and woodland classed as 'ancient' or 'veteran' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreation, cultural value, history and contribution to landscapes."

Impacts

The Woodland Trust is particularly concerned about the following:

- Disturbance by noise, light, trampling and other human activity;
- Fragmentation as a result of the destruction of adjacent semi-natural habitats;
- Development providing a source of non-native plants and aiding their colonisation;
- Where the wood edge adjoins buildings, gardens or public areas, branches and even whole trees can become safety issues and be indiscriminately lopped/felled. This is threatening to the longer-term retention of such trees and can result in a reduction of the woodland canopy;
- Where gardens abut woodland or the site is readily accessible to nearby housing, there is an unfortunate tendency for garden waste to be dumped in woodland and for adjacent landowners to extend garden areas into the woodland.
- There can be changes to the hydrology altering ground water and surface water quantities. Also the introduction of water run offs from urban development will result in changes to the characteristics and quality of the surface water as a result of pollution/contamination etc.

The close proximity of a large residential development to our site could have numerous adverse impacts on the health of our sites. Currently the areas in which development options are being proposed act as a protective buffer and area of undeveloped and natural habitat adjacent to both Lumb Brook Valley and Grappenhall Heys. By replacing this natural area with a residential development there will be a dramatic change in the intensity of the land use. This will expose these sites to a variety of outside influences, also known as 'edge effects', which may have impact negatively on both of these sites. The current options proposed will result in both sites being completely surrounded by housing.

In order to protect the site's fauna and flora from exposure to edge effects it is necessary to implement a buffer zone. A buffer is a landscape feature used to protect sensitive areas from the impacts of development (or other harmful neighbouring land use). The buffer could be planted with trees or shrubs or it could be an area of land which the development is not allowed to encroach upon (e.g. a grassy strip).

Buffers should be designed on a case by case basis, and depend on a variety of factors, such as number of houses, alternative areas of green space available, layout of the development, etc. The Trust recommends that a buffer of at least 20m is implemented between any area of proposed development and Grappenhall Heys to avoid disputes regarding trees on the edge

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

of our woodland. As Lumb Brook Valley is ancient woodland, we would expect a larger buffer of at least 50m. This buffer should consist of 50% planting of semi-natural vegetation.

The implementation of a buffer consisting of hawthorn would help to prevent edge effects and garden-related problems from arising by preventing encroachment on to our site. Alternatively a grassy strip, while not having the above benefits, would also serve an important purpose as it will help to separate the woodland from development and encourage a phased habitat to the woodland edge.

It should be noted that gardens of adjacent housing must not be included within buffer zones as there is limited control over how they may be used, or developed in the future; for example, they might be paved or decked without the need for planning permission or they may include inappropriate species which could integrate themselves into our site. Further to this the Trust recommends that gardens of houses are not backed on to our site as they result in the increase of garden-related problems for adjacent wooded areas, i.e. waste tipping, littering, spreading of invasive and non-native plants species, disturbance, pet intrusion, etc.

Conclusions

In summary, the Trust **objects** to the current proposed development until our concerns are fully addressed. This includes an adequate buffer zone and an agreement on site access to ensure that any potential damage to our site will be alleviated entirely.

We believe that the inclusion of Lumb Brook Valley as Strategic Green Space is inappropriate, and that the Council should find other alternatives to fulfil their green space obligations. Furthermore, the conversion of our site Grappenhall Woods into a country park, without consulting the Trust or receiving permission is improper, and the plans should be altered to remove our site from a plan of this nature.

We hope you find our comments to be of use to you. If you are concerned about any of the concerns raised by the Woodland Trust then please do not hesitate to get in contact with us.

Yours sincerely,

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████████████████████ Ancient Woodland

Site reference name	Nearest Town	Development description	Woodland adjacent or within?	Type of woodland affected (e.g. ASNW, PAWS, secondary) & grid reference
Garden city suburb	Appleton	Housing / absorbed into green space	adjacent	Lumb Brook Valley -ASNW – Woodland Trust Site (SJ627849)
	Appleton	Housing	Adjacent	Grappenhall Heys – Woodland Trust Site –(SJ627858)
	Warrington	Become potential country park	Within	Grappenhall Wood – Woodland Trust Site –(SJ641858)