



Planning Regulation (Minerals & Waste)
Environment & Economy
Oxfordshire County Council
Speedwell House
Speedwell Street
Oxford
OX1 1NE.

Sir/Madam

**OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN, PART 1 – CORE STRATEGY
PROPOSED SUBMISSION DOCUMENT, AUGUST 2015**

The Woodland Trust appreciates the opportunity to comment on the council's Core Strategy Proposed submission Draft.

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.

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. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

National Planning Policy Framework (NPPF) 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."

The Trust understands that Oxfordshire County Council has given due consideration to the NPPF regarding the development of the Core Strategy. However it must be noted that paragraph 118 of the NPPF far from affords full protection for ancient woodland; 'unless the

need for, and benefits of, the development in that location clearly outweigh the loss' highlights the potential loophole that could result in ancient woodland being lost to future development.

We welcome the consideration of ancient woodland in Policy C7 Biodiversity and Geodiversity of the plan. However this policy states: 'except where the need for and benefits of the development in that location clearly outweigh the loss'. This is almost a direct replication of the, NPPF. Whilst we recognise that local plans must be in general conformity with the Framework they do not need not replicate it. We would consider the following wording to give enhanced protection whilst being in conformity with the NPPF:

'Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional'.

We hope you find our comments useful. 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,

A black rectangular redaction box covering the signature of the sender.

Victoria Bankes Price MRTPI

Day, Peter - E&E

From: Victoria Bankes Price <VictoriaBankesPrice@woodlandtrust.org.uk>
Sent: 22 September 2015 12:56
To: Minerals and Waste Plan Consultation - E&E
Subject: Woodland Trust Response to Core Strategy Submission Draft
Attachments: 220915 Oxfordshire Minerals Core Strategy Submission Draft .pdf

Sir/Madam

Please find the Woodland Trust's response to the Oxfordshire County Council Core Strategy Submission Draft.

If you have any queries please do not hesitate to get in touch with me.

Kind regards

Victoria

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