

To whom it may concern,

Re: Mid Suffolk and Babergh District Councils Biodiversity and Trees SPD Consultation

The Woodland Trust is the UK's leading woodland conservation charity. We own over 1,000 woods throughout the UK and our head office is in Grantham. Our aims are to protect existing woodland, create new woodland, and enable people to enjoy and appreciate woodland.

Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture, and refresh our souls. A world without trees and forests would be barren, impoverished and intolerable.

We are interested in working with Mid Suffolk and Babergh in developing policies beneficial to trees and woodland in its emerging Supplementary Planning Document (SPD) for biodiversity and trees. We would also like to work with this authority to enable it to better protect woodland, particularly irreplaceable habitats such as ancient woodland, and Ancient and Veteran Trees (AVTs), and to plant trees as part of a well-planned network of green infrastructure.

The Councils' combined tree canopy cover is just 9.8 per cent, which contrasts to an average of 38 per cent across the EU. Therefore, we believe that woodland creation and conservation should be a major priority for the SPD.

Principally, it is key to select the right tree for the right place and, while we recognise the role non-native trees will play in meeting near-term targets, as well as the ability of some to confront specific concerns like air pollution on busy streets, they should be minimised both to prevent the introduction of pests and diseases through tree importation (viz. biosecurity risk) and to offer the greatest ability for already-existing flora and fauna to benefit. The maximum possible proportion of new trees should be native, and UK and Ireland Sourced and Grown (UKISG).¹ Not only are some pests hazardous to human health, but supporting local nurseries and tree growers confers an economic benefit. The overall ambition should be for a canopy cover of 30 per cent in new developments.

It is essential that the climate and nature crises are addressed jointly, with trees' remarkable ability to fight each recognised by the SPD. Resolving the nature crisis resolves the climate crisis, but this is not necessarily true the other way around. So, while encouraged by the SPD's references to trees' biodiversity contribution, we would like it to go further, assigning definite BNG targets while grasping future opportunities afforded by Local Nature Recovery Strategies (LNRSes) required by the Environment Act 2021. Complementing these should be a robust commitment to protection for individual AVTs where identified.

Specifically, we would like to see the SPD expand on these environmental principles in the following ways.

1. Protection of valued habitats must be at the heart of the SPD. In particular, irreplaceable habitats, **including AVTs, must be protected from loss and damage.** To achieve this, the SPD should:
 - Give weight to the relevant Local Nature Recovery Strategy (LNRS) as it is refined. This should identify ancient woodland sites to ensure that development is not allocated in close proximity to ancient woodland.
 - For AVTs, the Supplementary Planning Document (SPD) should encourage their recording on the Ancient Tree Inventory² as a matter of course and consider locations where it might

¹ <https://www.woodlandtrust.org.uk/about-us/what-we-do/we-plant-trees/uk-sourced-and-grown-scheme/>

² <https://ati.woodlandtrust.org.uk>

be suitable to place a Tree Preservation Order on any ancient, veteran, or notable trees recorded.

- Adhere to appropriate buffering standards for ancient woodland and AVTs:
 - Preserve a 50-metre buffer between new developments and ancient woodland, unless a smaller buffer is proven sufficient. Larger buffers may be needed for major engineering work or disruptive post-construction activities.
 - For AVTs, ensure a Root Protection Area that is 15 times the trunk's diameter or extends five metres beyond the canopy, whichever is greater.
 - Assess the nitrogen impact of ammonia-emitting developments on ancient woodland less than five kilometres distant.
- For **non-AVTs**, adopt the Bristol Tree Replacement Standard³ with respect to felling and specify replacement trees be planted no more than 12 times the distance of the original tree's trunk diameter, to correspond with root extent area.

These measures will help safeguard the ecological integrity of ancient woodland and the health of AVTs in the face of development pressures.

2. The SPD must go beyond minimum requirements for BNG and be an example of best practice:
 - The SPD should require all development projects to deliver 20 per cent BNG **minimum**.⁴
 - Consideration should be given to the quantum of other investment sources (public and private) which will be needed in order to meet these targets.
 - The SPD should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act.
 - This is particularly important for woodland creation, as it takes many decades for new woods to reach maturity and their full ecological potential.
 - BNG should deliver a rich mix of habitats including native woodland, informed by LNRs.
 - Habitat creation funded through other mechanisms (such as public funds) should also be maintained in the long term.
3. The SPD should give strong weight to LNRs for development site allocation at a local level:
 - This will be essential to embed avoidance of impacts to existing sensitive natural assets, by providing a 'spatial' element to site allocation decisions. It is vital that development is allocated in a way which protects important sites for nature, maintains ecological integrity and maximises potential enhancements from land in recovery.
 - Once a site has been allocated in a local plan, it is more likely to receive planning permission, so it is essential to embed ecologically coherent criteria for spatial prioritisation at the framework level.
 - LNRs should also be used to inform priority locations for the provision of green infrastructure, and habitat creation and enhancement through BNG.
4. The SPD should set standards for high-quality green infrastructure for development:
 - Everyone should be able to see three trees from their home.
 - Similarly, no one should be more than 300 metres from the nearest natural green space, with safe and accessible routes.
 - Consideration should also be given to the Woodland Trust's Access to Woodland Standard which aspires that everyone should have a small wood of at least two hectares in size

³ <https://bristoltreeforum.files.wordpress.com/2020/03/bristol-tree-replacement-standard-btrs.pdf>

⁴ [The Biodiversity Metric 3.0 – JP039 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/Policy-and-Programme/Policy-and-Programme-Details/Biodiversity-Metric-3.0-JP039)

within 500 metres of their home, and a larger wood of at least 20 hectares in size within four kilometres of where they live.

- A strong tree retention standard⁵ for responsible development must also be embraced, ensuring the preservation of trees and their ecological benefits. This standard will require a thorough tree survey during initial site investigations, categorising trees by their health and quality (A, B, C or U), and submitting a clear Tree Retention Plan. Additionally, it will mandate the creation of a Tree Protection Plan, safeguarding tree root systems and establishing construction exclusion zones (CEZs).

In summary, we consider that the Environmental Principles must be treated as a foundational component of the SPD. As part of incorporating the principles, the SPD must support the protection of sensitive natural assets, such as AVTs; be an exemplar of emerging BNG practice; and set high standards for the retention and provision of trees within developments.

⁵ <https://crawley.gov.uk/sites/default/files/documents/PUB285867.pdf>