



London Borough of Brent Local Plan Consultation

December 2019

About the Woodland Trust

The Woodland Trust (“the Trust”) 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. We aim to achieve this by restoring and improving woodland biodiversity and increasing people’s understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK. In total our sites cover over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

We welcome the opportunity to comment on the draft Brent local plan.

Policy BGI2 Trees and Woodlands

We recommend this be amended to include explicit protection for ancient woodland and veteran trees by adding new point

f) Development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.

Ancient woods are irreplaceable. They are our richest terrestrial wildlife habitats, with complex ecological communities that have developed over centuries, and contain a high proportion of rare and threatened species, many of which are dependent on the particular conditions that this habitat affords. For this reason, ancient woods are reservoirs of biodiversity, but because the resource is limited and highly fragmented, they and their associated wildlife are particularly vulnerable.

The National Planning Policy Framework (NPPF) (paragraph 175c) states: “When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.

Direct impacts that would lead to damage or loss of ancient woodland habitat or veteran trees must either be avoided or compensated for if the need is judged to be truly exceptional; there is no appropriate mitigation for the loss of irreplaceable habitats.

Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the

applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

POLICY BGI1 GREEN AND BLUE INFRASTRUCTURE IN BRENT

We support the principle that residential developments should have access to the natural environment, including to woodland.

The Woodland Trust has developed a Woodland Access Standard to complement Natural England's Accessible Natural Green Space Standard. We recommend that:

- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

We welcome the presumption in favour of the retention and enhancement of existing trees, woodland, and hedgerow cover on development sites, and that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted.

We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on *Local Authority Tree Strategies* (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.

Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust *Residential developments and trees - the importance of trees and green spaces* (January 2019).

We further recommend adding that a target tree canopy cover of at least 20 per cent will be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

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Regional External Affairs Officer - South East