Woodland Trust comments: Bournemouth Community Infrastructure Levy
Draft Charging Schedule 2015

Green Infrastructure

Whilst Bournemouth’s wider green infrastructure networks, as well as Sustainable Alternative Natural Green Space (SANGS) are acknowledged as being infrastructure requirements to be taken into account with your Draft Regulation 123 List, trees and woodland specifically should also be acknowledged. The CIL regulations confirm the definition of infrastructure in the Planning Act 2008, section 216, specifying that ‘open spaces’ and ‘flood defences’ are eligible items to be included with a Community Infrastructure Levy (CIL).

Although Bournemouth town centre is a tightly defined urban area and a key strategic location, there is a wealth of natural interest and accessible green space that should also be protected and enhanced throughout your borough in the wider conurbation and this is taken into account with your adopted Local Plan (2012). For example, Policy CS30 in your Local Plan seeks to retain and enhance your multi-functional green infrastructure network. Therefore, the Woodland Trust would suggest the Draft Regulation 123 List acknowledges trees and woodland as being part of green infrastructure provision is amended so that it can be taken into account more effectively to read:

‘Provision of open space, green space, new woodland creation, leisure and recreation.’

The National Policy Planning Framework (NPPF) states that Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. (DCLG, March 2012, para 114). In relation to both s106 and CIL, woodland creation should therefore a key element of green infrastructure provision and natural open space. Tree planting can deliver a wide range of benefits 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. Our publication Woodland Creation? why it matters http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodandCreationbro.pdf therefore, needs to be acknowledged and also taken into account.

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. The Town and Country Planning Act 1990, as amended, sets out the duties of the local planning authority when it is considering planning applications. Section 70(2) states that:

“In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations.”
Section 197 requires 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,”

To make such orders (Tree Preservation Orders) under Section 198 as appear to the authority to be necessary in connection with the grant of such permission, whether for giving effect to such conditions or otherwise”.

In addition the Natural Environment and Rural Communities Act 2006 places a duty on local authorities to have regard to the conservation of biodiversity in exercising their functions.

Woodland creation also 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’.

Also, although flood defence and drainage infrastructure is being taken into account, the role which trees and woods, planted in appropriate locations, can play in alleviating certain types of flooding and improving water quality should also be acknowledged with your Regulation 123 List. The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues. 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 http://www.woodlandtrust.org.uk/mediafile/100083927/Woodland-actions-for-biodiversity-and-their-role-in-water-management.pdf Also our Slowing the Flow report published this year should also be taken into account http://www.woodlandtrust.org.uk/mediafile/100188521/lga-flood-report.pdf

The water-related services that trees can provide should also be acknowledged with your Regulation 123 List. Trees in the right place can support reducing flood risk, stabilizing river banks, reduce nitrate levels in groundwater as well as reducing agricultural diffuse pollution in waterbodies. Therefore, investigating the potential for natural approaches to flood risk management, including the planting of trees and hedgerows and ensuring planning is made aware of the role trees can play in terms of reducing flood risk when considering any threat to existing trees and woods with proposed development, and especially the role of trees in SuDS schemes, should be taken into account. Also, the Woodland Trust can provide guidance where trees and woods can also be acknowledged with land management and site screening for retained allocations, and also for new development.

Infrastructure required in Bournemouth Borough

Our response to your previous CIL draft Charging Schedule in 2014 identified the need for natural open space provision, as well as woodland creation to be taken into account with requirements for green infrastructure. **Whilst your revised draft Charging Schedule does now take SANGS into account we would still like to see the second bullet point of Paragraph 2.8.2 amended (upper case) to read - Green Infrastructure: leisure, sports and NATURAL open space provision INCLUDING WOODLAND CREATION.**

Tree planting can deliver a wide range of benefits 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/4117WoodlandCreationbro.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).

Therefore, as requested again, when determining proposals that could have an adverse impact on green infrastructure across your Borough, native woodland or ancient/ veteran trees as well as woodland creation should also be taken into account and acknowledged so as to support growth being put forward across your Borough and establish appropriate CIL rates with your Charging Schedule.

**Housing, Employment and Woodland in Bournemouth Borough**

The proximity of woodland to a proposed development site also needs to be acknowledged at some point with land going to be put forward for housing development. This should also be part of enhancing biodiversity and nature conservation, and also as a sustainable design principle for surface water run-off.

The Woodland Trust would wish to see the view taken that proximity and access to woodland is an important contributor to creating healthy communities and ‘placemaking’. As highlighted in Government policy by the *Public Health White Paper* (Healthy Lives, Healthy People; Nov 2010), there are currently tremendous opportunities for native woodland to contribute positively towards delivering improved mental and physical health. Research shows that woodland can provide benefits for air quality, urban heat island cooling, physical exercise provision and relief from mental illness.

The *White Paper* states that: "*Access to green spaces is associated with better mental and physical health across socioeconomic groups.*" and that "*Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents’ quality of life and reduce the negative effects of deprivation, including health inequalities.*"

Recognising these policy linkages, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our *Space for People* publication. We believe that the WASSt can be an important policy tool complimenting other access standards used in delivering green infrastructure for health benefits.

The WASSt is complimentary to Natural England’s ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- 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 would be pleased for Space for People and the WASSt to be used to inform the development of your CIL Charging Schedule for Bournemouth Borough.**
Also, a very recent report for the Woodland Trust seeks to identify the economic benefits of green infrastructure because sometimes the broad range and nature of the benefits associated with woodland is not always being taken into account effectively. Woodland is identified as a policy tool for housing development, mitigating flooding and also rural regeneration and the fact that this can raise the quality of life and the environment in rural areas. See the Woodland Trust publication The Economic Benefits of Woodland -http://www.woodlandtrust.org.uk/publications/2015/03/the-economic-benefits-of-woodland/

**Monitoring and Review**

Currently, your Local Plan consultation does acknowledge the value of monitoring your CIL Charging Schedule and this is supported. As a Local Planning Authority you are required to publish an Annual Monitoring Report (AMR) to assess the effectiveness of polices and guidance that forms part of the local development plan. The NPPF supports the need for more habitat creation by stating that: `Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’, (DCLG, March 2012, para 114). Also para 117 states that: `To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan’.

Whilst monitoring is being taken into account with your adopted Core Strategy (2012), effective monitoring also needs to be put in place with your CIL so as to highlight any effective delivery. Therefore, maintaining a high quality natural environment should be defined as a measurable objective of a planning obligation your CIL Charging Schedule as well, such as woods and trees and canopy cover. Local Planning Authorities should identify suitable indicators for monitoring the plan, and ‘net gain’ should be identified as something that should be measured with a Charging Schedule. Therefore, measuring indicators such as development within the Green Belt and planning decisions that effect climate change and the impact of a development on the landscape, should also be taken into account with the monitoring of your CIL Charging Schedule for Bournemouth Borough relating to sustainable building and places.

Maintaining a high quality natural environment should also be defined as a measurable objective of your CIL, and currently there is no indicator of biodiversity proposed, or any other environmental targets such as woods and trees and canopy cover. Local Planning Authorities should identify suitable indicators for monitoring the plan, but ‘net gain’ is not identified as something that should be measured. Therefore, creating sustainable buildings and place in Bournemouth Borough and measuring development proposed, created, restored or managed as a result of local planning decision, against the area of habitat lost, damaged or declining as result of a planning decision, should also be taken into account with more effectively with the Monitoring of your detailed guidance on the implementation of policies in Charging Schedule.

**Other Comments on the Preliminary Draft Charging Schedule**

When the Community Infrastructure Levy Charging Schedule has been submitted for its examination, in accordance with section 212 of the Planning Act 2008 and the need to comply with appropriate statutory requirements and also use appropriate evidence to inform the preparation of the CIL Charging Schedule, the Woodland Trust should be notified effectively.

Please do not hesitate to get in touch with me if you have any queries arising from this response.

Yours sincerely,
Ian Lings
Local Planning Support Volunteer