Library Ref: MIQ39

1. Additional Statement: Matter 5

In November 2017, the Forestry Commission and Natural England updated their standing advice, Ancient woodland and veteran trees: protecting them from development.

This document sets out the principles planning authorities should consider for developments affecting ancient woodland and veteran trees. The standing advice picks up from the National Planning Policy Framework with regards to the importance of veteran trees and the need for their protection, Paragraph 118 of the National Planning Policy Framework (2012) states: *When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: ... 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 ...'.*

Together these documents state that planning permission should be refused if proposals involve the loss or deterioration of veteran trees, unless the need for, and benefit of, development in that location clearly outweigh the loss.

The standing advice requires developers to identify aged and veteran trees as part of tree surveys and to show different root protection areas on plans.

The Ancient Tree Forum and the Woodland Trust consider that all ancient trees and mature veteran trees should be recorded in Category A3 in accordance with BS5837:2012. The standing advice also recommends a larger root protection area for veteran trees, *'at least 15 times larger than the diameter of a veteran tree'*. (Previous guidance – BS5837:2012 – recommends the minimum root protection area to be at 12 times larger with a cap at 707m² (15m radius)).

Retention of veteran trees is one thing, avoidance of deterioration is another thing altogether...

Recent experience and research using systems such as TreeRadar show the root systems of veteran trees are often more extensive and vulnerable than thought, and veteran oak roots can extend up to 23m.

In addition, if only the roots within a Root Protection Area are retained, the loss of damaged/removed root system outside the zone together with the mycorrhizal system surrounding in that area frequently lead to tree stress and subsequent death of the tree.

The Veteran trees along Long Copse Lane and within the copse have grown within a unique, balanced climatic environment sustained for very many decades. Changes in levels of sunlight intensity, atmospheric moisture, access to water and changes in air currents through their canopies, especially in in combination with root and stem

damage, will lead to opportunistic diseases and insect attacks, and the shortening of expected lifespan.

Tree stress leads to reduced resilience and vunerability to pests and diseases. Ultimately a tipping point in the physiological deterioration of the tree is reached, and it's destruction.

Currently the characteristics of these Veteran trees provide an essential habitat for several bat species (including especially rare Barbastelle)

- Linear features (tree lines & hedgerows)
- Roosting features such as loose bark, splits, cracks, trunk hollows and rot holes
- Wet woodland (seasonal pond and roadside ditches)
- Ivy growth on trees
- Tree canopies overarching provide vital routes over obstructions such as roads (see attached photo)
- A rural setting of relatively dark night skies and low levels of noise & disturbance.

Please see attached Ancient Tree Inventory records and Location Plan for the verified Veteran trees likely to be harmed should the development proceed.

The last couple of years since 2019 have witnessed the destructive impacts of unsustainable projects on communities and the natural environment resulting from intense pressure to build on undeveloped green field sites.

We have also become more aware of the urgency of retaining and protecting existing trees and woodland, especially those mature specimen providing the most in Environmental goods.

2. Comments on the Transport Assessment Report & the Ecology – Arboriculture Report:

A1.1.1 "Surface water modifications making ditch and associated drainage channels obsolete" – SuDS will likely negative impact on existing biodiversity (invertebrate and aquatic, and the health of adjacent trees

A.2.1 "Width of Hollybank Lane and of Long Copse Lane to be increased to 5.5m in some sections, with a 1.8m footway." - Likely impact to tree root systems, and impacts from main branch pruning.

A.2.3

"Trees within a minimum of 450mm assessed for removal", ("above height of anticipated traffic"). (*Prime Environment Ecology – Arboriculture Report mentions three individual trees and three tree groups, and suggests little impact will accrue.* However supporting detail of which trees and an assessment of their ecological contributions are absent).

<u>And</u> "Proposed crown lifting to ensure branches do not overhang the carriageway at low level" - These "branch bridges" provide essential bat foraging routes for woodland bat species (e.g. Myotis including Bechstein's and Barbarstelle)

A.4.3

"Lighting column and boundary hedge obstructions and to be removed." (*Prime Environment Ecology* – *Arboriculture Report mentions 10m loss of hedgerow, and a further 40m filled, but that 30m will be provided by new site. This does not allow for the real time it takes for new hedgerow to establish and be capable of replacing lost hedgerow in biodiversity terms*)

3. In Conclusion:

In general there is a lack of information in the application with which to assess the likely negative impacts to biodiversity & rural character of Long Copse Lane. Clearly a Landscape & Visual Assessment is overdue.

Despite the ecological sensitivity of this area too much is deferred to the detailed design stage.

There is still no report included on the Cumulative Impacts of this proposal alongside other developments in the area, within Havant Borough Council, and the neighbouring authorities.

There is still a particular lack of detail about habitat fragmentation and careful protection and enhancement of existing biodiversity, including prevention of harm from increased human use of nearby Ancient Woodland, including impacts to Hollybank Wood.