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Sent: 22 September 2021 21:43

To: Development Brief <developmentbrief@cherwell-dc.gov.uk>

Subject: Local Plan Partial Review Draft Development Brief (Site PR7b: Land at Stratfield Farm, Kidlington).

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Please find attached a response from the Woodland Trust to the Local Plan Partial Review Draft Development Brief (Site PR7b: Land at Stratfield Farm, Kidlington).

Our response addresses the impact on our adjacent site at Stratfield Brake as well as the potential for green infrastructure across the development site.

Best wishes,

Bridget

Please note my mobile number is [REDACTED]

Cherwell District Council - PR7b Land at Stratfield Farm: Development Brief Draft for Consultation

Response from the Woodland Trust

September 2021

About the Woodland Trust

The Woodland Trust ("the Trust") is the UK's leading woodland conservation charity: we want 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, including Stratfield Brake adjacent to this development site. 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.

Summary

We welcome the opportunity to comment on the draft Development Brief (PR7b) for the land at Stratfield Farm.

We welcome the commitment to a multi-functional green infrastructure network across the site (section 6.5). We welcome the inclusion of woody elements, including the protection and extension of existing trees, orchards and hedgerows, the use of sustainable drainage, and the commitment to plant new trees of native species.

We recommend strengthening this section with

- 20% target for biodiversity net gain across the site.
- a tree canopy cover target for 30% across the site.
- a greater than 1:1 requirement for tree replacement.
- specifying UK & Ireland sourced & grown (UKISG) standards for new tree planting.
- protecting and providing woodland to meet the Trust's Woodland Access Standard.

We welcome the commitment in section 6.4.5 to work with the Trust on the proposed new canal bridge and towpath improvements and welcome the opportunity for further discussion on this and other topics affecting our Stratfield Brake site.

We believe there is an important opportunity to improve the hydrology of the site and to enhance the environmental quality of the waterside habitat. We are grateful for the opportunity to respond to this consultation and look forward to working with Cherwell District Council as the plans develop.

Our detailed response focuses primarily on:

- The proposals for green infrastructure across the site (section 6.5)
- Conservation and access impacts for the Trust's Stratfield Brake site.

Green infrastructure (Section 6.5)

We welcome the commitment to a multi-functional green infrastructure network across the site. We welcome the inclusion of woody elements, including the protection and extension of existing trees, orchards and hedgerows, the use of sustainable drainage, and the commitment to plant new trees of native species.

Hedgerows and trees outside woods provide vital connectivity between habitats, contribute shelter, and shade, and assist with water management, among other green infrastructure benefits. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.

To achieve ongoing benefits, green infrastructure needs to be protected and maintained. CIL allocations should include green infrastructure, including management plans and funding for maintenance. Natural green infrastructure is cost-effective: for example, trees cost less to maintain than regularly mown turf and have wider biodiversity benefits.

We note the commitment to seeking a minimum of 10% biodiversity net gain through the planning process, in line with emerging legislation. As this is a new, greenfield development we believe there is potential for a higher level of net gain and would encourage setting a 20% target across the site. Setting a more ambitious target increases the chances that worthwhile amounts of net gain will be delivered, given the possibility that specific initiatives intended to deliver such gain may fall short in practice.

We recommend setting a target for tree canopy cover as part of this development brief, to 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.

We propose setting a minimum 30% tree canopy cover target for new development land or by a development-related ratio, for example stipulating that a minimum of 10 trees are planted on site for every new house constructed. This would contribute to the rapid increase in tree cover that has been proposed by the UK's Committee on Climate Change. We commend the Wycombe District SPD on Canopy Cover (2020) as an example of such a policy.

We welcome the recognition of the value of trees for the environment, and the presumption in favour of the retention and enhancement of existing trees, woodland, and hedgerow cover on the site. Integrating trees and green spaces into developments early 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 request 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. 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, in line with the Woodland Trust guidance on Local Authority Tree Strategies (July 2016). We commend the Bristol City Council Planning Obligations SPD (2012) as an example of such a policy.

We welcome the commitment to planting native tree species. Native tree species provide the best habitat for the native birds, insects, fungi, and plants that are critical to Oxfordshire's

biodiversity. We would further encourage the specification where possible of UK & Ireland sourced and grown (UKISG) tree stock for new planting, to support biodiversity and resilience. Imported tree stock is the primary source for pests and diseases against which existing native trees have no defence. It is important that public policy leads the way in protecting plant health.

We welcome the commitment to Sustainable Drainage Systems (SuDS) across the site. Woods and trees should form an integral part of all SuDS schemes. Planting trees can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt. Tree roots can increase infiltration rates in compacted soils by 63%, and in severely compacted soils by 153%. Integrating SUDS into the tree pit design for street trees can have a significant effect on 'slowing the flow'. Providing adequate soil volume for trees hard surface areas also helps retain water and reduces the threat of future building movement from desiccated soil.

We welcome the commitment to publicly accessible woodland. We recommend that this meets the Trust's Woodland Access Standard, developed to complement Natural England's Accessible Natural Green Space Standard. This recommends 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 would be happy to discuss these policy issues further with your officers as the proposals develop.

Stratfield Brake: conservation and access

The Trust's Stratfield Brake site is adjacent to the site, on the southwest boundary, as acknowledged in section 4.1 of the development brief (Site Constraints). The Trust manages our sites for people and for nature, maximising the opportunities for appropriate public access, while providing high quality natural habitats.

We provide free public access to woods for quiet, informal recreation and our woods are managed to make them accessible, welcoming, and safe. It is important that any adjacent development does not harm the tranquillity of the site, and that encroachment on its edge is avoided as this could adversely affect its environmental quality and its value as a natural habitat.

We would ask that site layout and construction management plans ensure that:

- built elements are located at the areas of the site away from Trust's site
- construction site access is away from the Trust's site
- traffic access to any future development is away from the Trust's site.

We welcome the proposal to locate the priority areas for habitat creation and restoration immediately adjacent to the Trust's site, maximising the potential for habitat connectivity and nature recovery.

We would propose that this area is managed in the same way as the adjacent wetland within the Trust's site. This is a mix of scrub and wet meadow, with permanent open water, featuring reedbed and sedge, managed by grazing cattle. We would encourage the creation of new scrapes (ponds) connected to the existing canal-side ditch network, providing high quality habitats for invertebrates and wading birds.

Stratfield Brake is one of the largest open access countryside sites available in this area. However, public access is currently excluded in parts of the site, to protect sensitive wildlife using the wetland area, and to reduce contact and transfer with diseased oak trees in the mature woodland area. The provision of additional accessible natural green space within the Stratfield Farm site is therefore particularly welcome.

The proximity of the site to the Oxford canal means that Stratfield Brake forms part of a connected network of accessible land. We note the proposal to create a new footbridge across the Oxford Canal, linking the development site to the public towpath. This is in addition to the existing footbridge at the western end of the Trust's site, near the wetland area. We welcome the improved access to the towpath and the greenspace network. However, it is important that this is managed to avoid inappropriate access to the protected wetland areas.

The access path for this new footbridge is shown between the extended wildlife site and an area with some limited public access. We would like to see this path fenced with stock proof fencing either side, with the installation of locked field gates for maintenance and grazing. The path would have good visibility of the meadows and there could be interpretation included, to ensure users can enjoy the wetland area without harming it.

We welcome the commitment in section 6.4.5 to work with the Trust on the proposed new canal bridge and towpath improvements and welcome the opportunity for further discussion on this and other topics affecting our Stratfield Brake site.

Although not directly part of this development brief, we note the reference the allocation of Land at Frieze (PR6c) as being reserved for the potential construction of a golf course. This site is adjacent to the south of the Trust's Stratfield Brake site. We are very concerned that such a land use could introduce fertilisers and herbicides that may flow into the combined ditch network, seriously undermining the ecological quality of our site.

21 September 2021

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