

## About you

- First name: Heather
- Surname: Elgar
- Address: [REDACTED]
- I am completing this form as: An organisation
- If other, please specify: •
- Job title: Regional External Affairs Officer - South West
- Organisation: Woodland Trust
- On behalf of: •
- Email address: [REDACTED]
- Did you submit comments on the Regulation 18 (First Draft) Local Plan?: Yes
- Local Plan Consultee List: I would like to be added to the Local Plan consultee list

## Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Policy
- Please tell us which paragraph/policy your comment relates to: Strategic Policy 1.6 (2) Delivering good design
- Do you consider the Local Plan to be legally compliant?: Yes

- Do you consider the Local Plan to be sound?: Yes

- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes

- Please tell us why you have answered yes and/or no to the questions above:

We support the policy that ‘Traditional and natural building materials should be used in all new development to complement Dartmoor’s vernacular’, which is strengthened by the ‘fabric-first’ approach required at Policy 1.7.1. In the context of the climate emergency and given the carbon intensive nature of the construction industry, the National Park Authority has an important role in developing clear design policies to help steer the decarbonisation of construction. Using sustainably sourced locally grown timber is an effective way of locking up carbon, while reflecting Dartmoor’s vernacular and supporting sustainable forestry. The Climate Change Committee has recently produced several useful reports on this issue including: Wood in Construction in the UK (<https://www.theccc.org.uk/publication/wood-in-construction-in-the-uk-an-analysis-of-carbon-abatement-potential-biocomposites-centre/>); and UK housing: Fit for the future? (<https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>)

- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?: •

- Do you wish to participate in hearing session(s)?: No, I do not wish to participate in hearing session(s)

- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary: •

## Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Policy
- Please tell us which paragraph/policy your comment relates to: Strategic Policy 2.2 (2) and Strategic Policy 2.3 (2)
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: Yes
- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes

- Please tell us why you have answered yes and/or no to the questions above:

As the UK's leading woodland conservation charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future. We manage over 1,250 sites, including over 200 sites in the South West, and have 500,000 members and supporters. We support the policies at 2.2 and 2.3 which translate NPPF and new net gain requirements into a clear and locally appropriate framework. We welcome the separation of protection (2.2) from the net gain principle and appropriate compensation at 2.3 which provides a clear order of application in line with the mitigation hierarchy. We support that protection and enhancement of connectivity in natural networks (through core areas, corridors and stepping stones, restoration areas, and buffer zones) is embedded in policy 2.2, and in particular 2.2.3e which provides protection 'the integrity of the local natural network', which is key for ecosystem function but not otherwise protected in designations. NPPF para 175c states, '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'. We strongly support that ancient woodland, parkland and aged and veteran trees, traditional orchards, upland oakwood and wet woodland

are identified as priority habitats afforded protection under policy 2.2.3d. We welcome that more recent as well as ancient wooded habitats are protected in this way. However, we are concerned that the wording at policy 2.2.3e ‘of non-functional size’ weakens protection for ancient and veteran trees without clarification of the definition of ‘non-functional size’. We would like explicit protection of irreplaceable habitats (including ancient woodland and ancient and veteran trees) that is not open to interpretation. We suggest clarity at 2.3.20 as to which (currently worded as ‘many of’) priority habitats listed at Table 2.1 are irreplaceable for the purposes of interpretation of NPPF para 175c, and for this to be referenced in the policy wording. For example: ‘Irreplaceable habitats, including ancient woodland and ancient and veteran trees (ref NPPF para 175c) are not suitable for off-site compensation.’ We note there is no explicit policy regarding appropriate Root Protection Area (RPA) distances. Especially for ancient and veteran trees, where a more precautionary approach is warranted, we advise that RPA distances should be greater than the standard buffers stated in BS 5837:2012. The RPA should be a minimum of 15 times the diameter of the tree trunk or five metres beyond the canopy, whichever is greater. Especially given the small scale nature of development on Dartmoor, biodiversity net gain should be mandatory for all development, not only those specified at 2.3.25. Overall, we find that the Local Plan provides protections for Dartmoor’s wooded habitats, consistent both with the NPPF and with the legal purpose of National Parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, although these should be strengthened per the comments above. We welcome that Dartmoor’s wooded habitats are reflected in the special qualities and vision. As owners of a number of woodlands in the Dartmoor National Park, the Woodland Trust is keen to work proactively and constructively with Dartmoor National Park Authority to help drive nature recovery on the landscape-scale across and beyond Dartmoor, in line with the Park’s legal purpose. We look forward to ongoing collaboration to this end.

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- Do you wish to participate in hearing session(s)?:  
No, I do not wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:
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