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Planning,
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Dear Mr Claydon-Bone

Application: 20/00077/TCA

Proposal: Tree works | Marlhill Copse, Mansbridge Road, Southampton

Comment – Ensuring tree works align with the essential protection of ancient woodland

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 29,000 hectares (71,000 acres) and we have over 500,000 members and supporters.

The Trust is concerned that the tree works in planning application (20/00077/TCA) may not wholly correspond to those required for the protection of the flora and fauna of the south-eastern part of the site that is ancient woodland. This wood is known as Marlhill Copse (grid ref: SU45071536), and is designated as an area of Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory (AWI). The trees within the AW appear to be T2-12 and those in G1.

Ancient Woodland

Natural England¹ and the Forestry Commission defines ancient woodland "*as an irreplaceable habitat [which] is important for its: wildlife (which include rare and threatened species); soils; recreational value; cultural, historical and landscape value [which] has been wooded continuously since at least 1600AD.*"

Planning Policy

National Planning Policy Framework, paragraph 175 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 reasons⁵⁸ and a suitable compensation strategy exists;

Footnote 58, defines exceptional reasons as follows: "*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.*"

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Southampton City Council's Adopted Core Strategy (amended 2015) Policy CS 22 – Promoting Biodiversity and Protecting Habitats states that the “*Council will promote biodiversity through:*

1. Ensuring development does not adversely affect the integrity of international designations, and the necessary mitigation measures are provided; or the development otherwise meets the Habitats Directive;

2. Ensuring development is unlikely to have an unacceptable impact on a national or local designation; and that any such impact (on these or other features of biodiversity value) is avoided, mitigated or as a last resort compensated for.”

Impacts on Ancient Woodland

It is difficult to determine the general state of maturity of trees within the ancient woodland from the tree survey, as no stem diameters have been provided. Understanding the age of a tree often signifies value due to the decay features associated with the aging process. While the tree survey does give detailed information about potential decay, internal cracks and hollowing within tree stems, the proposals also involve recommendations for felling and removing some of those trees found to have such features.

Branch shedding and deadwood is a dynamic aspect of healthy tree growth which plays a part in the maturation of a tree's crown. After maturity, the crown of an aging tree will naturally reduce further in the process called retrenchment. This process, alongside increasing trunk girth, enables many trees to remain biomechanically stable as they reach great age, without the need for human intervention. The aging process creates habitat of great value for biodiversity; decaying wood habitat, with aging bark and old root systems, provides habitat for rare species, including specialist wood decay fungi and invertebrates, which in turn support important and threatened species of flora and fauna.

The Trust therefore recommends that, where possible, old trees displaying veteran characteristics are retained within the ancient woodland. It is important that signs of decay are not necessarily used as justification for felling of trees which such features. Other options for retention of trees should be explored, such as removal of particularly dangerous limbs, crown reductions and as a last resort monolithing, which is the process of removing a tree's crown but leaving the main stem standing to become a monolith of deadwood; this can help retain decaying wood habitat for biodiversity purposes, but still improve safety. Further to this, rather than removing cut deadwood from the area, retaining it within the ancient woodland enables crucial habitat for specialist fungi and invertebrates to be retained.

Conclusion

In summary, the Woodland Trust is concerned that the proposed tree works may not align with the protection afforded the area through its status as ancient woodland; a habitat known to be important for its ecological value.

The information provided to date is not quite detailed enough in determining the maturity of the trees and their potential ecological importance. As such, we trust that the council will consider the general recommendations we have proposed above that are aimed at minimising the loss of biodiversity, whilst ensuring any necessary tree works are carried out.

If you would like clarification of any of the points raised please contact us via campaigning@woodlandtrust.org.uk

Yours sincerely,

The Campaigning Team

Enc. Screen shot from Magic Maps showing postcode Marhill Copse, named and the area designated Ancient and Semi-Natural Woodland marked in green hatching.

