1. Malvern Community Forest is working with local and county-wide landowners, tourism and leisure, wild-life and local government agencies to develop a strategy to re-launch and strengthen local woodland economies. This strategy is planned to be launched during National Tree Week, December 2019.

1.1 The local woodland economy has experienced a long decline, despite trees, hedgerows and woodlands being typical of much of the landscapes of South Worcestershire; and despite the social, economic and health benefits recognised in the South Worcestershire Development Plan (2016) of these environmental assets. **Their sustainability depends on having a valued economic role.**

1.2 A convergence of factors provides a window of opportunity to reverse the decline. These include Brexit; policy changes arising from the Government's "A Green Future: Our 25 Year Plan to Improve the Environment", such as changes in agricultural funding; recent wide-spread recognition of timber as a biomass fuel; recent public awareness of the need to replace plastics in everyday life.

1.3 One of the factors the development of a thriving woodland economy will depend on is a supportive planning policy. We first set out the changes we believe necessary in SWDP 5: Green Infrastructure and SWDP 22: Biodiversity and Geodiversity to provide a foundational planning policy. We then suggest changes to other strategic and guidance areas necessary to foster the development of a woodland economy.

1.4 The views expressed below in the Comments on the SWDPR Issues and Options paper are those of Malvern Community Forest alone, and not those of any other organisation or agency with which we are working or with whom we are holding discussions.

2. The Adopted South Worcestershire Development Plan contains many exemplary objectives regarding Green Infrastructure and Biodiversity. SWDP 5: Green Infrastructure supports the wider Worcestershire Green Infrastructure Strategy (2013) and the multiple benefits of Green Infrastructure in both the built environment and open countryside. The Reasoned Justification in SWDP 22: Biodiversity and Geodiversity (Paragraph 1, p. 145) sets the tone. "Without an appropriately strong planning policy the recent trend of biodiversity and geodiversity losses will continue..... Without positive action therefore there is real danger, particularly given the likely impacts of Climate Change, that in the long term the ecosystems themselves will begin to fail."

3. Since this was written there have been a number of important documents published showing just how strong this trend is, and the disastrous impacts human society and its economic practices are having globally [EU report: UN report; WWF report]. Habitat loss and disintegration through development combined with climate change are a highly toxic mix for the natural world, wildlife, and human health, and significant shifts in society, economics and culture are necessary to counteract them.

4. At the local level, Malvern Community Forest is proposing that "appropriately strong" planning policy requires a consistent, robust approach to trees, hedgerows and woodlands in the built environment and open countryside. For example, some recent South Worcestershire planning decisions and independent assessment reports have shown lack of appreciation of the SWDP 22, Reasonable Justification position that "Bringing back or re-creating lost habitats is fraught with technical difficulties and is unproven for many habitat types and so the local planning authority expects protection of important existing features to be the norm in most cases, with re-creation after habitat loss to be considered only where this is not practical"(Paragraph 1, page 145). Even here there is a lack of definition of "important" or "practical", similar to the ambiguity around what is "possible" or "practicable" in SWDP 22E and 22F.

5. This consistent approach can be ensured by an addition to SWDP 22:

SWDP 22G. Further details of the manner in which the policy will be implemented with respect to trees, hedgerows and woodland will be set out in a Trees, Hedgerow and Woodland Supplementary Planning Document.

In the SWDP 22 Reasoned Justification section an additional paragraph is then required:

3. A Trees, Hedgerow and Woodland Supplementary Planning Document (SPD) will be produced. It will contain further detailed advice on how the policy will be implemented with regard to these environmental assets at street, open space, urban and peri-urban woodland, and open countryside level.

6. SWDP 22 Biodiversity and Geodiversity is part of the guidance designed to provide context and direction to development management decisions arising from strategic policy SWDP 5 Green Infrastructure. SWDP 5 has been judged to be working well enough that it is not formally included in the review (South Worcestershire Development Plan Review Issues and Options Consultation paper, paragraph 18.1). Malvern Community Forest proposes that this successful strategic policy should be extended to Employment Land development by the following addition to SWDP 5:

SWDP 5 D: an equivalent strategy for Employment Land development to contribute towards the provision, maintenance, improvement and connectivity of Green Infrastructure will be in place from January 1st 2021, following the technical studies of the Green Infrastructure Strategy detailed in the SWDPR Issues and Options Consultation paper, paragraph 3.12.

In the SWDP5 Reasoned Justification section an additional paragraph is then required:

5. Employment land is identified in the Worcestershire Green Infrastructure Strategy (2013) as an equivalent Key Delivery Opportunity for Green Infrastructure (para. 5.1) to housing development, and an equivalent strategy to

SWDP 5 A, B and C will be developed. High priority needs to be given to visual screening of such development to reduce its visual impact in both its local area and from more distant view points.

7. Response to Question 1: Evidence Base

The Technical Study of the Green Infrastructure Strategy should include research and development of GI strategy requirements for development on Employment Land, in line with paragraph 6 above about additions to SWDP 5.

8. Response to Question 2: Vision

Changes required to paragraph 6.4:

6.4 Small-scale businesses have flourished in rural areas through the support offered by the SWDP policies including **home-based working, farm diversification opportunities, and development of a woodland economy**. Farm diversification has enabled farming and horticulture to continue to play an important role in the local rural economy. This has been.....

9. Changes required to SWDP 12 Employment in rural areas

After SWDP 12E, insert:

Woodland economy

F. Support will be given to local initiatives to develop and implement strategies for re-launching local woodland economies

In the SWDP 12 Reasoned Justification, a new paragraph 4 should be inserted, and existing paragraphs 4 and 5 become paragraphs 5 and 6 respectively.

New paragraph 4 to read:

The long-term decline of woodlands and their management has led to saw mills and other necessary infrastructure being closed down, falling below a critical mass for a locally sustainable woodland economy. Innovative approaches will be required, such as Woodland Hubs, focussing collaboration across the private, not-for-profit and agency sectors.

10. Response to Question 3: Objectives

The following Objective needs to change, inserting 'and woodland ventures' as indicated in bold below

2. To work with partners, in particular the Worcestershire Local Enterprise Partnership, to strengthen the urban and rural economies by enabling local businesses, including farms **and woodland ventures** to start, grow, adapt and diversify.

11. Changes required to SWDP 13: Effective use of land

In SWDP 13 A, add:

iv. Making only exceptional use of woodlands and forest

After SWDP 13 I insert:

Woodlands and Forestry

J. Windfall development proposals which would result in the loss of any woodlands or forest must follow the Trees, Hedgerow and Woodland Supplementary Planning Document set out in SWDP 22G

12. Response to Question 10: Green InfrastructureComments on the need to change SWDP 5 and SWDP 22 are made above in Sections 5 and 6, having made the case for the changes in Sections 1-4.

Regarding the identified needs for additional guidance: all agreed, with the following proviso:

Clarify that the target GI amount excludes private gardens – agreed, but if those gardens incorporate and enhance local green infrastructure – e.g. existing hedgerows as boundaries; existing trees within the garden managed appropriately as coppice or pollards – some adjustment might be possible. **Guidance to be provided in the Trees, Hedgerow and Woodland Supplementary Planning Document set out in SWDP 22G.**

13. Response to Options 26: Green Infrastructure

The SWDPR should include GI plans or strategies for strategic sites to ensure that they link to the wider GI network and address the relevant GI priorities whilst maintaining a percentage requirement for GI.

14. Response to paragraph 12.13

Given the massive loss of habitat and biodiversity that has now been recorded and published, it is not just designated sites that must be protected. All sites have potential for biodiversity value. Given that most habitat destruction arises through development, it will be a rare case where new development enhances biodiversity assets: the sites where this is most likely to happen will be on intensively farmed Best and Most Versatile Agricultural Land, which is some of the least biodiverse land.

15. Response to Option 27: Biodiversity

The SWDPR must:

a. continue to protect all designated sites from development;

b. establish and maintain maximal buffer zones;

c. require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites; and

d. seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, **to link it to** the wider biodiversity network: these habitat areas must **not** be spatially separated from the development site.

Encouraging the biodiversity enhancement of sites through development is a contradiction except for minimally diverse sites, such as intensively farmed Best and Most Versatile Agricultural Land, as detailed above in Section 14: Response to paragraph 12.13

16. Response to Option 28: Green Space

The SWDPR must

a. continue to protect all currently designated green space;
b. review all designated green spaces; and
c. enhance or restore any surplus, poor quality greenspace, including into alternative green infrastructure such as managed woodland where degradation is most severe.

17. Response to Question 12: Landscape character

SWDP25 should be revised to take into account impact on views and visual amenity, acknowledging that GI such as trees, hedges and woodland can be managed to enhance views and visual amenity rather than simply blocking views through under-management, as will be outlined in the **Trees, Hedgerow and Woodland Supplementary Planning Document set out in SWDP 22G**

18. Response to Option 29: Areas of Outstanding Natural Beauty

The SWDPR should not revise SWDP23 with respect to development proposals, but should extend it to include development within the setting of the AONBs.