

Representor ID: RCRP-052

UI Representor ID: 30

UI Representation ID: 898

Representor Name: Bridget Fox

Representor Organisation: The Woodland Trust

Policy: Policy CEA11		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	Yes	Yes
Paragraph		
Compliance Comment		
Strongly support this policy, in particular: point C setting a 19% canopy cover target; points D & E encouraging tree retention and woodland enhancement; point F setting woodland access requirements in line with Woodland Trust standards. This is in line with NPPF para 136. "Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments ... and that existing trees are retained wherever possible."		
Modification Comment		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy CMK1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	No	Yes
Paragraph		
Compliance Comment		
Central Milton Keynes has low tree cover and is a high priority area for tree planting on the UK Tree Equity score. The policy is silent on this despite the canopy cover target set in CEA11 Urban greening, trees and woodland.		
Modification Comment		
Add new point 9. "An uplift in tree cover and urban greening in line with policy CEA11 Urban greening, trees and woodland"		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy GS12		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	Yes	Yes
Paragraph		
Compliance Comment		
This area has tree cover as low as 7%. The policy is silent on addressing this despite the canopy cover target of 19% set in CEA11 Urban greening, trees and woodland.		
Modification Comment		
Add point 9. "An uplift in tree cover and urban greening in line with policy CEA11 Urban greening, trees and woodland"		
Appear at examination?	No	
Appear at examination reason?		

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Representor Name: Bridget Fox

Representor Organisation: The Woodland Trust

Policy: Policy GS17		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	Yes
Paragraph		
Compliance Comment		
<p>The policy as worded gives insufficient protection to ancient woodland. Bow Brickhill Heath includes two unnamed areas of ancient woodland: No name , 9.28 ha, 490574:233871 and No name, 1.6 ha, 490603:233862.</p> <p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development. NPPF para 193c states that “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”.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>		
Modification Comment		
To comply with the NPPF, add “including suitable buffer zones for the adjacent ancient woodland” to point 2		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy CB1		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	Yes	Yes
Paragraph		
Compliance Comment		
Central Bletchley This area has low tree cover and is a high priority area for tree planting on the UK Tree Equity score. The policy is silent on this despite the canopy cover target set in CEA11 Urban greening, trees and woodland.		
Modification Comment		
Add point 8. "An uplift in tree cover and urban greening in line with policy CEA11 Urban greening, trees and woodland"		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy CEA2		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	Yes	Yes
Paragraph		
Compliance Comment		
Support this policy which is in line with NPPF para 164. "New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change... through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems".		
Modification Comment		
We suggest strengthening the policy with explicit mention of native species in point 3 ie "3. Incorporate a variety of appropriate native plant species which are low maintenance and drought resistant." Using native species is better for biodiversity given the interdependence of other native species for food and habitat.		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy GS19		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	Yes
Paragraph		
Compliance Comment		
<p>The policy as worded gives insufficient protection to ancient woodland. This site includes an area of ancient woodland Oakhill Wood, 31.55 ha. 481255:235678.</p> <p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development. NPPF para 193c states that “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”.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>		
Modification Comment		
To comply with the NPPF, add “including suitable buffer zones for the adjacent ancient woodland” to point 3 and/or point 12.		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy GS14		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	Yes
Paragraph		
Compliance Comment		
<p>As presently drafted the policy gives inadequate protection to ancient woodland, in this case Mustoe Old Wood 492245:242436 and Lower Wood 492406:241580. The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development. NPPF para 193c states that “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”.</p> <p>Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>		
Modification Comment		
To comply with the NPPF, add “including suitable buffer zones for the adjacent ancient woodland” to point 15.		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy CEA9		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
No	No	Yes
Paragraph		
Compliance Comment		
<p>The wording on protection of designated sites and irreplaceable habitats does not comply with the NPPF. Lack of alternative sites is not a valid criterion for allowing loss or harm to protected habitat. The current (2024) NPPF states in para 193 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 reasons [ie nationally significant infrastructure projects] and a suitable compensation strategy exists". The revised draft NPPF (Dec 2025) states in Policy N6 2. "Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodlands and ancient and veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."</p>		
Modification Comment		
<p>To comply with the protections specified in the NPPF, delete lines B1-4, C1-5 and D1-3 and replace with wording based on the NPPF eg</p> <ol style="list-style-type: none">1. an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site OR2. unless there are wholly exceptional reasons and a suitable compensation strategy exists.		
Appear at examination?	No	
Appear at examination reason?		

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Policy: Policy GS15		
Legal Compliant:	Soundness Compliant:	Duty to Cooperate Compliant:
Yes	Yes	Yes
Paragraph		
Compliance Comment		
<p>This area has relatively low tree cover, alongside some important trees, namely: Notable tree ref 28622, mulberry Notable tree ref 2978 hybrid sessile and English oak Veteran tree ref 28619, common lime Notable tree ref 28620, pedunculate oak (reference numbers from the Ancient Tree Inventory). The policy mentions green and blue infrastructure but makes no specific reference to trees. Veteran trees enjoy the same NPPF protection as ancient woodland.</p>		
Modification Comment		
<p>Add point 16: "Protection of existing trees of value, together with an uplift in tree cover and urban greening in line with policy CEA11 Urban greening, trees and woodland".</p>		
Appear at examination?		
Appear at examination reason?		