

# LOCAL ACCESS FORUM

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Natural England  
Foss House, King's Pool  
1-2 Peasholme Green  
YORK YO1 7PX

Forestry Commission  
620 Bristol Business Park  
Coldharbour Lane  
BRISTOL BS16 1EJ

01 July 2025

Dear Forestry Commission and Natural England,

**Reference: Consultation on standing advice for ancient woodland, ancient trees and veteran trees.**

This letter constitutes a formal advisory response from the joint Warwickshire, Solihull and Coventry Local Access Forum to this important consultation on the standing planning and infrastructure advice for ancient woodland, ancient trees and veteran trees.

*<https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>*

It is the statutory function of forums to give advice under Section 94 of the Countryside and Rights of Way Act 2000 to various bodies which includes both the Forestry Commission and Natural England.

The DEFRA Guidance for Local Access Forums requires forums to have regard in carrying out their role and duty to:

- ☐ the needs of land management both rural and urban;
- ☐ the desirability of conserving the natural beauty and recreational importance of the area for which it is established, including the flora, fauna and geological and physiographical features of the area; and
- ☐ improvements to public access to the countryside and public rights of way for the purposes of open-air recreation and enjoyment of the area.

## **Zone of Failure Safety Buffer**

This forum would ask that consideration be given in this review to 'resetting' Britain's approach to protecting and conserving our 'irreplaceable' ancient woodland, ancient trees and veteran trees. In particular, to establish a new requirement for a minimum 'Zone of Failure Safety Buffer' around these irreplaceable habitats when considering all new development proposals.

With the climate crisis irrefutably linked to more frequent and unpredictable extreme weather events and consequences, a natural *Safety Buffer* should now be an essential requirement for all new developments adjoining ancient woodland, and also in proximity to ancient and veteran trees. It is also likely that insurance companies are going to increasingly factor safety buffers into their premiums, similar to proximity to rivers.

This could be based on a minimum of 1.5 times the height of the tallest AW boundary trees, to facilitate a safety buffer of at least 50m. A larger buffer may be required for particularly significant engineering operations, or for after-uses that could generate significant disturbance or public access. In these circumstances, local planning authorities have a 'duty of care' to ensure that the safety of the public (including all future residents), will not be compromised as a result of any planning decisions they may take in light of the climate crisis.

At present, the Government's standing advice states:

*'For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area).'*

This 15m buffer zone (RPA) is sometimes being used by developers and local authorities as a 'default' requirement. However, given that many ancient and veteran trees on a woodland boundary can often exceed 30m in height, and by definition include dead and dying trees that also have an important biodiversity value; a buffer zone of at least 15m adjoining an ancient woodland is simply not sufficient to ensure the 'safety' of the public from large falling trees or heavy branches in the event of more frequent extreme weather events and storms; particularly for those living in adjoining new housing developments. This forum, would, therefore, advise and ask that consideration be given to establishing a new minimum 'safety' buffer zone around our ancient woodlands when considering all new development proposals, to protect the public and these irreplaceable natural assets in an increasingly dangerous and volatile world, and would offer some possible wording along the following lines:

*'The UN Environment Programme (UNEP) has reported that the world is now in a state of 'climate emergency', which is resulting in more frequent and extreme weather events, and we need to shift into an emergency gear. In light of this climate emergency, an adequate '**zone of failure safety buffer**' needs to be*

*established and maintained around the edge all ancient woodlands, ancient trees and veteran trees, based on a minimum of 1.5 times the height of the tallest AW boundary trees, when considering all new development proposals, to facilitate a natural safety buffer of at least 50m. A larger buffer may be required for particularly sensitive sites, significant engineering operations, or for after-uses that may generate significant disturbance or public access. This natural 'safety-buffer' will also help to preserve the health, biodiversity and integrity of these 'irreplaceable' natural habitats and landscape features from development and other harmful environmental impacts in the future.'*

<https://www.unep.org/climate-emergency>

We trust this considered response from the joint Warwickshire, Solihull and Coventry Local Access Forum will be helpful in your review.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sheila Cooper', with a large, sweeping arch over the first part of the name.

Sheila Cooper  
Acting Chair of the Warwickshire Solihull and Coventry Local Access Forum  
Please Respond Directly to: [sheila.ann.cooper41@gmail.com](mailto:sheila.ann.cooper41@gmail.com)  
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