



LOCAL ACCESS FORUM

17 September 2025

Dear Members of the West Midlands Combined Authority

RE: West Midlands Local Nature Recovery Strategy Consultation

The Warwickshire, Solihull and Coventry Local Access Forum (LAF) have only belatedly become aware of this consultation and offer this brief response in accordance with section 94(5) of the Countryside and Rights of Way Act 2000; in particular, DEFRA Guidance for Local Access Forums requires forums to have regard in carrying out their role and duty and function to the following which forms a small part of our remit:

- ☐ 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 taking into account the important mental and general health benefits open-air recreation affords and is free at the point of access.

Protect and Enhance Strategic Greenspace Corridors

The joint Warwickshire, Solihull & Coventry LAF welcomes and fully supports this important strategy to help 'safeguard and improve nature', which is so badly needed in the West Midlands, particularly in light of all the emerging development taking place in the region and the increasing pressures on our valuable green spaces.

The loss of productive Green Belt agricultural land (BMV) in UK food production and the ecosystems and ecology and biodiversity it supports is deeply concerning. Furthermore, the ancient public rights of way which crisscross this land provide the recreational connectivity to the wider rights of way networks and also connectivity for wildlife to enable a biodiversity of species to thrive. The loss of permeable Green Belt land in full UK food production removes land and vegetation which help to naturally sequester carbon unlike the many financially speculative commercial developments bring with them a huge and toxic carbon footprint.

The LAF would highlight the need to protect, enhance and connect our existing 'strategic greenspace corridors' in the region to help nature recovery and species 'adapt' to the climate crisis, for example, through facilitating the movement, connectivity and, therefore, migration of wildlife. This includes protecting, enhancing and linking our precious Green Belt as a 'living network' for both people and wildlife; providing such a valuable role in preventing urban sprawl and safeguarding 'the countryside next door', with many benefits for nature and wildlife, climate change and adaptation, food and farming, and health and well-being.

In this regard, the LAF would highlight the important work that the CPRE has done in helping to promote the importance of the Green Belt for people and wildlife: 'Access to nature is one of the fundamental reasons that the Green Belt exists. We don't just want to protect the Green Belt for us it is a bastion for wildlife and needs protecting and expanding now more than ever in our increasingly nature-depleted country.'

The value of the Green Belt as a protection against the climate emergency, and it is an emergency, is incalculable.

Ancient Woodlands - Zone of Failure Natural Safety Buffer

The LAF ask that consideration be given in this strategy 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 and floodplains.

This could be based on a minimum of 1.5 times the height of the tallest AW boundary trees, to facilitate a natural 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.

Although we understand this is being jointly reviewed by Natural England and the Forestry Commission, the Government's standing advice currently 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).'

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

This 15m buffer zone (RPA) is often used by developers and local planning 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, ask that consideration be given to recommending 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, a natural 'zone of failure safety buffer' needs to be established and maintained around the edge of 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 brief and belated response from the joint Warwickshire, Solihull and Coventry Local Access Forum will be accepted and may be helpful, as you develop and promote a much-needed Nature Recovery Strategy for the West Midlands.

We would appreciate a confirmation of receipt of this response and an assurance we will be kept informed of the results of the consultation and the WMCA strategy moving forward. If there is anything else we can do to help please feel free to contact us. As a statutory advisory body, we are deeply concerned about the speculative planning approvals for development, of all sorts, that is causing devastating and cumulative losses of irreplaceable Green Belt productive land and the ecosystems a healthy and biodiversity of species it supports depend on to successfully breed and thrive.

Yours sincerely,

A handwritten signature in dark ink, reading 'Sheila Cooper'. The signature is written in a cursive style with a large initial 'S' and a long horizontal flourish at the end.

Sheila Cooper

Acting Chair: Warwickshire, Solihull and Coventry Local Access Forum

Please respond to: sheila.ann.cooper41@gmail.com

Copy to Acting LAF Secretary: charlesbarlow@warwickshire.gov.uk