Appendix 2 - Tree and Woodland Strategy - Summary of Representations received and Council's proposed response

	The Coal Authority (Rep 1)	
1	The Planning team at the Coal Authority have no specific comments to make on this document.	Response: N/A Action: None.
	Natural England (Reps 2 – 3)	
2	Natural England supports the strategy for its role in advancing Nature Recovery and enhancing Green Infrastructure. They highlight alignment with Derbyshire's Local Nature Recovery Strategy (LNRS), particularly in measures that focus on: • Measure 20 – buffering existing woodland • Measure 22 – identifying areas of new planting • Measure 30 – relation to increased tree cover through agro-forestry • Measure 63 – increasing the condition of existing hedgerows • Measure 64 – planting new hedgerows	Response: Natural England is right to point out alignment between its measures and the Tree & Woodland Strategy. The Council aims to ensure that our approach to tree and woodland management supports wider nature recovery ambitions and strengthens green infrastructure across the district. Action: None.
3	We suggest that reference could be made to Natural England's Green Infrastructure Framework Green Infrastructure Home which includes the Natural England Green Infrastructure Planning and Design Guide 2023 which provides advice about tree planting and incorporating trees into developments and urban areas.	Response: Many of the key words and aims found in the Tree & Woodland Strategy are very similar to what is in the principals of the Green Infrastructure Framework. As such, it would be best to mention it to demonstrated further alignment with the overall purpose of these projects. Action: Amend second paragraph of Target E4 as follows:

		This initiative aligns with the Council's ambition to plant many more trees across the district. Collaborations with partners like the Woodland Trust, ~~and~~ Bolsover Woodlands Enterprise <u>and Natural England</u> are key to... ...and community well-being. <u>This work will draw upon the guidance within Natural England's Green Infrastructure Framework on incorporating trees into developments and urban areas.</u>
DCC Landscape (Reps 4 – 9)		
4	Overall I remain supportive of the preparation of a Tree and Woodland Strategy for the Bolsover district. The document's opening sections outline the strategy's preparation process, evolving vision, and baseline data on existing trees and woodland. While the baseline assessment is informative, the maps are too small-scale to show spatial distribution effectively.	<u>Response</u>: Although the maps are relatively small, their primary role is to support the objectives being presented. It is recommended to retain the smaller maps in their current positions for illustrative context, while also providing each map on a separate page in a larger format to enhance visibility and detail. <u>Action</u>: Amend the document so that any page containing a map is immediately followed by a new page displaying an enlarged version of that map, occupying the entire page. Apply this change to the following: Figures 1-5, 8, 10
5	The Woodland Trust's aspiration for universal access to a 2 ha wood within 500m is not something I support, as some landscapes are valued for their lack of woodland. Nonetheless, evidence indicates Bolsover district is well served, with 81% of homes within 500m of such woodland.	<u>Response</u>: The Woodland Trust's aspiration acts more as a guide, not as a rule. The Council understands that some landscapes are valued for being open and free of woodland, and as a consequence the Council would not support the plant of significant numbers of trees where this would harm the character of the landscape. <u>Action</u>: None.

6	Chapter 5 outlines Targets, Priorities, and Actions for managing trees and woodlands. Section 5.1 presents sensible targets for caring for existing resources, each supported by actions and delivery timeframes. While the strategy is ambitious and positive, concerns are raised about the practicality of multiple actions sharing the same timeline, which may be difficult to achieve without dedicated, qualified resources.	Response: This feedback is noted and it is acknowledged that many of the target's dates for completion are clustered together and that this may prove challenging to achieve. As such, these target dates are being reviewed in light of the consultation feedback. Action: Review target dates.
7	Section 5.2 addresses the expansion of tree and woodland cover. Concerns are raised that the character of the landscape should remain a key determinant for planting, yet this is absent from the baseline information despite being central to county policy. Productive farmland is unlikely to be converted to woodland, so planting should focus elsewhere. The ambition of achieving 20% canopy cover is commendable, but distribution should vary across the district to respect valued landscape characteristics. Doubts are expressed about the emphasis on equity of tree cover (Target E2), as some areas are defined by open views rather than woodland. Using wards as spatial units may not reflect landscape character and should be applied cautiously. A stronger emphasis on urban planting and street trees is recommended, where the district has greater control and the benefits would be more significant.	Response: The Council agrees that aiming for 20% canopy cover is the right ambition but acknowledges that new tree planting must also sit well within the local landscape. However, it is considered that this will be achieved given the Strategy's primary method of achieving this increased canopy coverage will be through the expansion of existing key woodland assets. Action: Amend paragraph in E2 as follows: Expanding canopy cover in wards with low coverage is essential for promoting equity in access to green infrastructure, as well as supporting climate resilience and biodiversity. Tree equity is the idea that all communities have equitable access to the benefits of trees where they live. ~~As shown in~~ While E1 shows canopy cover varies widely across wards ~~within the district~~, improving tree equity should reflect local landscape character and historic context, and support delivery of Derbyshire's Local Nature Recovery Strategy. ~~Bolsover aims to progress equality in all spheres of social and economic life and empower and engage local communities to effect positive change.~~

8	Section 5.3 focuses on community pride and engagement. Most actions are considered positive and supported, though doubts are raised about the relevance of interactive mapping tools from New York and Paris for Bolsover. It is also noted that 'Green Industry Cooperation' is assessed as low priority, despite the fact that farmers and landowners will be essential for delivering key actions such as hedgerow management and replanting.	Response: The Council notes the positive comments but acknowledges that New York and Paris are different to Bolsover District. However, that does not mean that interactive mapping tools used in those regions cannot be effective here. The Council acknowledges that farmers and landowners are critical to delivering actions such as hedgerow management and replanting and will ensure that 'Green Industry Cooperation' is given greater priority in the delivery plan. Action: Amend the priority for Target C5 from low to medium.
9	In the table at page 46, I note that the opening 'Action Theme' refers to "known sights" – I think this should read "known sites".	Response: Noted. The table at page 46 will be amended accordingly. Action: Amend first paragraph under the description heading on page 46 as follows: Mapping of potential plantable space in soft and hard landscapes which is to include: tree equity and planting priority assessment; the exclusion of known ~~sights~~ sites with existing constraints against tree planting; and potential sites for woodland expansion.
DCC Planning (Rep 10)		
10	I have no comments to make.	Response: N/A Action: None.

	Forestry Commission (Reps 11 – 19)	
11	The Woodland Condition Assessment Framework is recommended, with guidance available via GOV.UK – Operations Note 69. For Ancient Woodland Buffers, current Natural England/Forestry Commission advice requires a minimum 15m buffer zone from woodland boundaries to prevent root damage and deterioration. Larger buffers may be necessary where impacts such as air pollution or construction dust extend further. While 15m may suffice for small developments, larger projects should apply greater buffers. The advice is under review, with expectations that the minimum requirement will increase. Natural England suggests a 30m minimum buffer would be more effective in most cases, depending on development size and type.	Response: Noted. With regard to the Ancient Woodland Buffers, the Council notes the current 15m advice but accept that larger buffer zone distances would be more appropriate for larger developments. As such, the Strategy will be amended to include Natural England's suggestion of a 30m minimum buffer. Action: Include a new paragraph in the text above Target T4 (page 27) as follows: For new development, Natural England and the Forestry Commission currently advise a minimum 15m buffer zone from woodland boundaries to prevent root damage and deterioration, with larger buffers potentially requiring up to 30m where impacts such as pollution or construction dust extend further.
12	Section 4 - 4.1 Tree and Woodland Canopy Cover baseline England's current tree and woodland canopy cover is 14.5 per cent, not the 16.5 per cent shown in the bar chart. The Government's aspiration is to increase canopy cover to 16.5 per cent of land area in England by 2050.	Response: Noted and the correct tree and woodland canopy cover figure will be stated. Action: Amend the bar chart in section 4.1 page 17 by amending the England's canopy cover percentage from 16.5% to 14.5%.
13	Conversion of Conifer blocks to Native Woodland Removal of conifer is considered good practice when undertaken as part of Plantation on Ancient Woodland	Response: Noted and a reference to Plantation on Ancient Woodland Site (PAWS) restoration schemes will be added.

	Site (PAWS) restoration. However, in secondary woodland, a mixed composition of conifer and native species is regarded as more beneficial, providing greater habitat diversity, supporting biodiversity, and offering opportunities for income generation.	Action: Amend second paragraph in section 4.1 page 18 as follows: Some 197 ha of conifer woodland can be seen in Bolsover, predominantly in Langwith ward. Much of the forestry in Bolsover dates back to post-war industry, and some plantations are identified within Bolsover's Local Nature Reserve Action Plan as potential sites in which to target thinning and felling to encourage the regeneration of more native broadleaf woodland in a bid to boost native biodiversity. This would preferably be achieved through a Plantation on Ancient Woodland Site (PAWS) restoration scheme.
14	Section 5 – **5.2 – E1: Expanding Tree and Woodland coverage** When planning new tree and woodland planting, it is important to consider both the species and provenance to ensure a resilient treescape capable of adapting to the impacts of climate change. The biosecurity of planting stock must also be addressed to prevent the introduction of pests and diseases, particularly in areas close to ancient woodlands.	Response: Noted. The Council follows the Woodland Trust's UK and Ireland Sourced and Grown scheme when purchasing trees, which ensures all provided saplings are sourced, grown, and audited within the UK / Ireland to maximise biosecurity, supporting native species resilience against pests and diseases. Action: None.
15	**T2: Management Plans** The Forestry Commission supports woodland management plan to enable active management. This is important for ancient woodlands, where biodiversity must be maintained and enhanced. Such diversity	Response: The Council will consider preparing a single management plan for all of its owned woodlands and notes that this work could be supported by a Forestry Commission Woodland Management Plan Grant. The option of UKFS Compliant Action Plans will also be considered as a proportionate alternative to full woodland management plans.

	strengthens resilience, improves productivity, and delivers wider environmental benefits. The diversity and benefit of woodlands will be lost time if they are neglected. These interventions are also crucial in the face of climate change where active management is needed to help woodlands adapt. For council-owned woodlands, a single management plan covering all holdings, divided into compartments, could be prepared instead of separate plans for each site. A Woodland Management Plan Grant from the Forestry Commission could support this approach and potentially unlock countryside stewardship funding. It may be worth considering UKFS Compliant Action Plans rather than full Woodland management plans.	Action: None.
16	E5 States that the English Woodland Creation Offer (EWCO) can be used for urban trees including street trees. EWCO can be used for woodland creation, including shelter belts, but not for urban or single trees. A single application can however be made on several different plots, for example where parish councils have landholdings and a joint application can be made covering several of them.	Response: Noted. The bullet point under point 1 in Target E5 will be amended to clarify that the English Woodland Creation Offer (EWCO) cannot be used for urban or single trees, including street trees. It will instead be noted that EWCO supports woodland creation, including shelter belts and rural trees. Action: Amend Target E5 as follows: England Woodland Creation Offer (EWCO) – for shelterbelts ~~urban,~~ ~~peri-urban,~~ and rural trees. ~~including street tree replacements.~~

17	The LNRS should also be referenced and can be used when looking at potential sites for woodland creation and BNG.	Response: The Council agrees that more reference should be made within the Strategy to the Derbyshire Local Nature Recovery Strategy and so the Strategy will be amended accordingly (see elsewhere). Action: None.
18	The strategy does not address a presumption against tree removal in development or provide guidance on compensatory planting where felling is unavoidable. It may also be worth mentioning felling licences and when exemption to licences apply.	Response: Noted and agreed. Action: Amend planning related text and include an additional sentence in the text in Target T4 (page 27) as follows: Tree felling is regulated under the Forestry Act 1967 and a felling licence from the Forestry Commission is generally required to fell trees, except where exemptions apply (e.g., small-scale felling below the volume threshold, trees in gardens, or where statutory undertakers carry out works).
19	It is also worth considering use of the Tree and Woodland Strategy as a supplementary planning document to encourage compliance with recommendations.	Response: The Strategy is being prepared as a corporate strategy and this is considered to be of more consequence than a Supplementary Planning Document. Action: None.
	Historic England (Reps 20 – 23)	
20	**Introduction section** – incorporate the role of trees and woodlands as important heritage features and discuss the contribution they make to heritage landscapes, both existing and when considering new tree planting.	Response: Noted and the important role of trees and woodlands as heritage features is agreed.

		Action: Amend paragraph 4 in the Introduction section as follows: …Woodlands also provide recreational opportunities, strengthen community connections with nature, and create vital habitats for wildlife. <u>They also form an integral part of Bolsover's cultural and historic identity and contribute to the character of conservation areas and listed settings.</u>
21	**Section 1.2** – Incorporating a specific paragraph on the benefits of trees and woodlands as heritage features and as contributing to the setting of heritage assets, would be welcome.	Response: Noted and the benefit of trees and woodlands as heritage features is agreed. Action: Insert additional point in section 1.2 as follows: **Contribution to heritage landscapes:** <u>Trees and woodlands enhance the setting of historic assets, including listed buildings and conservation areas. They frame views, create avenues, and maintain traditional field patterns, reinforcing the district's cultural identity.</u>
22	**Vision** – We would welcome a reference to heritage within the 'vision' of the document.	Response: It is agreed that heritage should be referenced within the vision. Action: Amend vision in section 3.2 as follows: To create a greener, healthier, and more connected Bolsover by nurturing and expanding our trees and woodlands, fostering community pride in them, enhancing biodiversity, <u>protecting heritage landscapes,</u> and taking care of our trees and woodlands for the benefit of current and future generations.

23	We would also welcome a paragraph on the potential pitfalls of trees / hedgerows within the vicinity of heritage assets and the need for appropriate species planting and ongoing maintenance. For example, careful assessment of species type that consider root growth and circumference to ensure that there is no potential for damage to heritage assets.	Response: It is noted that tree and hedgerow root growth can caused problems for nearby buildings. However, it is considered that this detail is covered appropriately through other Council documents, such as the Local Plan for Bolsover District and its supporting Historic Environment Supplementary Planning Document. Action: None.
	DCC Environmental Sustainability (Reps 24 – 31)	
24	Section 2 should reference Derbyshire's Heartwood Community Forest as this is relevant both as Community Forest protection and as a form of funding for new woodland which covers the Bolsover district.	Response: The Derbyshire Heartwood Community Forest project represents a large-scale programme to create a connected network of woodlands to boost biodiversity, combat climate change, and provide green spaces to local communities and should be given more prominence in the Strategy. Action: Include following paragraph in section 2.2 Community Groups and Stewardship as follows: **Derbyshire's Heartwood Community Forest** plays a key role in supporting woodland creation and community engagement across the county. It offers opportunities for funding and partnership that extend to Bolsover District, helping deliver strategic planting projects and strengthen links with regional woodland networks
25	The vision refers to Bolsover 'urban forest,' which does not sound fully appropriate to the district.	Response: The point about the term 'urban forest' is noted and it is considered that the term 'trees and woodland assets' is more appropriate. Action: Amend section 3.2 as follows:

		... This vision is the result of early workshops to understand how Bolsover District's ~~urban forest is~~ <u>tree and woodland assets are</u> perceived, how those involved want to see it improve, and what the future for the district's ~~urban forest~~ <u>tree and woodland assets</u> could look like. The vision aims to reflect the language and emotion of the early conversations to help shape this document into something unique for Bolsover.
26	The Strategy should include a reference to the UK Infrastructure 10-year strategy.	<u>Response</u>: The Council's Tree & Woodland Strategy is intended to support the Government's target of increasing tree and woodland cover to 16.5% of England's total land area by 2050 as required by the Environment Act 2021 (and referenced in the UK Infrastructure 10-Year Strategy). It is considered appropriate to reference the Environment Act target. <u>Action</u>: Amend paragraph 3 of section 5.2 target E1as follows: …There is a large variation across the wards, with the lowest canopy cover found in Bolsover East ward, and the highest in Langwith ward. Bolsover is working towards an ambition to achieve 20% canopy cover <u>in support of the Government's target of increasing tree and woodland cover to 16.5% of England's total land area by 2050 as required by the Environment Act 2021</u>.
27	Section 4 should reference challenges to woodlands, including Ash Dieback.	<u>Response</u>: The challenges to woodlands, including Ash Dieback, are noted and Section 4 will be amended to reference challenges to woodlands.

		Action: Add the following heading and paragraph to section 4.1 on page 19: **Challenges to woodland health:** While Bolsover's woodlands provide significant environmental and cultural benefits, they face increasing threats from pests and diseases. Ash Dieback is a particular concern, with the potential to cause widespread loss of ash trees, impacting biodiversity, landscape character, and heritage settings. Other risks include climate change stressors, invasive species, and soil degradation. Proactive management and species diversification are essential to build resilience against these challenges.
28	T1 and T2 should refer to Local Nature Recovery Strategy (LNRS) priorities and measures. Section 5.2 should include references to LNRS (appropriateness of trees) and Heartwood (as mechanism).	Response: The Council is supportive of the LNRS Heartwood project and references to it are proposed at key points of the Strategy (see elsewhere). Action: None.
29	Section 6 includes a typo - "The district wide system is to include all BCC-owned and community-reported tree and woodland assets and include GIS capabilities."	Response: This typographical error has been noted and will be corrected. Action: Amend third action theme on page 46 as follows: The district wide system is to include all ~~BCC~~ BDC-owned and community-reported tree and woodland assets and include GIS capabilities.

30	Section 7 should reference both the UK Infrastructure 10-year strategy.	Response: The Council notes the point about the UK Infrastructure 10-year strategy and references to it are proposed at key points of the Strategy (see elsewhere). Action: None.
31	C3 includes a copy and paste from another document, "will bring focus onto Mid & East Antrim's trees and woodlands, encouraging participation from those that live and work locally."	Response: This typographical error has been noted and will be corrected. Action: Amend paragraph 2 of section 5.3 target C3 as follows: Widely publicising events all year round - making good use of digital communications and social media - such as National Tree Week (usually in late November to early December), Arbor Day, planting days (winter time) and outdoor events, will bring focus onto ~~Mid & East Antrim's~~ Bolsover's trees and woodlands, encouraging participation from those that live and work locally.
	Derbyshire Wildlife Trust (Reps 32 – 38)	
32	DWT welcomes the Council's Draft Tree and Woodland Strategy.	Response: The support of the DWT is noted and welcomed. Action: None.
33	T1 – DWT holds information on many of the woodlands in the district and happy to support the Council in compiling an up to date inventory of them. Many sites are designated Local Wildlife Sites where information on the site's ecology is available. DWT also maintains	Response: This support is noted and welcomed. Action: None.

	an inventory of ancient/veteran trees and is keen to discuss how that could be updated in line with the plan.	
34	T2 - Many of these woodlands have plans of various types depending upon their purpose. Most of these are out of date. Preparing new plans for the woodland would be a significant undertaking and we would recommend prioritizing key sites wherever possible based on ecological value, threat and opportunity.	Response: This information is noted and welcomed. Action: None.
35	T4 - Veteran trees are irreplaceable habitat and should be identified, geo-located and mapped to ensure they are protected through the district. The inventory data held by DWT/DBRC provides a good starting point for this.	Response: This advice is noted and welcomed. Action: None.
36	E1 - It will be important to identify and exclude sites where there are exiting ecological features (species or habitats) of higher value that could be adversely impacted by woodland expansion. The impact of woodland expansion (both positive and negative) on priority habitats and species identified in the LNRS should also be considered. Key areas of potential conflict arise on brownfield in particular as these sites often support many rare and declining species.	Response: We acknowledge that expanding woodland in certain areas could have adverse effects on some habitats and species and our approach to new planting will reflect this. Action: None.
37	E4 - I would highlight the creation and enhancement of associated woodland habitats such as woodland glades, rides and 'edge' habitats (scrub, pond, ditch and grassland). Creating a more natural woodland that includes these other habitats will support higher biodiversity.	Response: This proposal is noted and welcomed. It is proposed that target E4: Expand Existing Key Woodland Assets will be amended to emphasise the value of incorporating glades, rides, and edge habitats such as scrub, ponds, ditches, and grassland, to create more natural woodland structures that enhance biodiversity.

		Action: Amend the first paragraph of Target E4 as follows: Bolsover District Council is committed to enhancing its existing woodland assets to bolster biodiversity, improve climate resilience, and provide accessible green spaces for residents. ~~Key sites such as Fox Green and Lark Rise Woods in Creswell are central to these planting efforts, with~~ This will include plans to expand and interconnect these ~~areas~~ existing woodland assets through strategic tree establishment and habitat restoration, alongside the creation and enhancement of associated woodland habitats such as woodland glades, rides and 'edge' habitats, which will create a more natural woodland that supports higher biodiversity.
38	Part 6 - There is a role for development to contribute strategically through Biodiversity Net Gain to woodland targets.	Response: This suggestion is noted and it is agreed that Biodiversity Net Gain (BNG) should be specifically referenced. Action: Amend sixth action theme on page 47 as follows: Scope and implement Section 106 funding for impact mitigation and ensure Biodiversity Net Gain (BNG) contributes to tree and woodland expansion projects in line with targets (E1–E4). Create a dedicated officer role/responsibility for bid/funding application and establish an ongoing bid writing process which enables BDC to secure funding for each coming planting season.

	Clowne Community Association (Reps 39 – 46)	
39	I find the charts and diagrams about tree coverage in the parishes hard to understand. I'm not sure what they show for Clowne, other than the obvious point that we need more trees. There doesn't seem to be an overall explanation that ties the data together. The Tree Equity diagram in section 4.2 is especially confusing, and I have no idea where Clowne ranks in that chart.	Response: The charts and diagrams show data for the District's Ward areas, rather than by settlements. We note that large parts of the District, including Clowne, do not have a Tree Equity score at present but this data is provided nationally on this basis. The Council will seek to secure or compile data for all of its areas as part of the implementation of the Strategy. Action: None.
40	What does section 4.3 illustrate?	Response: Section 4.3 seeks to outline the economic and environmental benefits provided by Bolsover's existing tree canopy. It shows how trees contribute through carbon storage and sequestration, reduced stormwater runoff, and air pollution removal, with these benefits expressed in both physical units and monetary value for each ward. This focus on ecosystem services is set out in Section 1.2 of the Strategy. Action: None.
41	Connections between areas of tree and woodland coverage are important because they act as wildlife habitat links. These corridors help connect islands of trees, overcome obstacles, and we need to make sure slim or narrow links aren't lost over time through insensitive actions.	Response: Noted and it is considered that the Strategy reflects this point. Action: None.
42	There will be a variety of types of habitats in woodland area not just one typology.	Response: Noted and it is considered that the Strategy reflects this point.

		Action: None.
43	Where are the farmers and their role mentioned in the strategy? Farmers hold most of the land, providing key opportunities to boost biodiversity and create wildlife corridors through field margins, hedgerows, and less productive areas, which can also support tree and woodland planting.	Response: The Council acknowledges that farmers and landowners are critical to delivering actions such as hedgerow management and replanting and will ensure that 'Green Industry Cooperation' is given greater priority in the delivery plan. Action: Amend the priority for Target C5 from low to medium.
44	Flora and Fauna is about creating conditions for the whole flora and fauna of the tree / woodland areas to develop and thrive.	Response: Noted and it is considered that the Strategy reflects this point. Action: None.
45	There is a clear conflict and negative impact between increased public access to areas of woodland and the value of areas as habitat.	Response: Noted and it is considered that the Strategy reflects this point. Action: None.
46	Some areas must remain free from human access to allow species that require isolation to survive, as human presence can harm these environments.	Response: Noted and it is considered that the Strategy reflects this point. Action: None.
47	Privately owned trees / woods would seem to offer a major part in the future strategy alongside any public owned areas.	Response: Noted and it is considered that the Strategy reflects this point. Action: None.