

6 May 2026

Mark Harrison esq.
Planning Department
Cotswold District Council
Trinity Road
Cirencester
Glos.
GL7 1PX

Sent via email: Mark.Harrison@cotswold.gov.uk

Dear Mark

Response to Matters Raised During the Hearing – LGS21 “The Cley”, Grevel Lane, Chipping Campden

This representation has been prepared by Morgan Elliot Planning on behalf of our client, Land at Grevel Lane SPV, following matters raised during the hearing sessions relating to proposed Local Green Space 21 (“The Cley”) within the Chipping Campden Neighbourhood Plan.

This correspondence is intended to assist the Examiner and parties in understanding the current position regarding the woodland management and felling licence process associated with the site, together with the relationship between that process, the Tree Preservation Order (“TPO”), and the evidence relied upon in support of the proposed Local Green Space designation.

In particular, this response addresses the assertions within the Neighbourhood Plan evidence base that the site comprises woodland and tree stock of particularly high amenity and ecological value, warranting additional Local Green Space protection.

Enclosed with this letter are the following documents:

1. Grevel Lane Woodland Management Plan;
2. Grevel Lane Management Compartment Plan;
3. Copy Tree Preservation Order relating to the site; and
4. Correspondence from the Forestry Commission relating to Felling Licence Application Ref. 018/1033/2026.

The Woodland Management Plan and Compartment Plan form part of the ongoing Forestry Commission licensing process and provide a detailed professional assessment of the current condition, health, and management requirements of the woodland.

Woodland Management and Forestry Commission Position

The enclosed compartment plan divides the woodland into six management compartments. The supporting Woodland Management Plan identifies widespread woodland degradation, including significant Ash Dieback

("ADB"), unmanaged scrub growth, declining tree health, structural instability, and risks associated with trees adjoining residential property and third-party land.

Importantly, substantial felling operations have been recommended across the majority of the woodland compartments as part of good and necessary woodland management.

By way of summary:

- Compartment 1 – approximately 90% clear fell proposed;
- Compartment 2 – approximately 80% clear fell proposed;
- Compartment 3 – approximately 75% clear fell proposed;
- Compartment 4 – regeneration felling across the compartment;
- Compartment 5 – approximately 60% regeneration felling proposed; and
- Compartment 6 – regeneration felling and pollarding operations proposed across the compartment.

The Woodland Management Plan repeatedly identifies:

- widespread Ash Dieback;
- structural decline;
- failing hawthorn;
- brittle timber;
- unmanaged scrub;
- declining woodland condition; and
- risks to adjoining land and buildings.

The proposed management approach is not one of wholesale woodland removal, but rather long-term woodland restructuring and restocking with a more resilient and sustainable species mix. The proposed replanting strategy includes species such as Small Leaf Lime, Hornbeam, Alder and Silver Birch, together with woody shrub planting.

The enclosed Forestry Commission correspondence confirms that the proposed operations have been reviewed positively as part of the licensing process and are recommended for approval, subject to conditions.

The current position appears to be that the Forestry Commission would ordinarily proceed to issue the licence in respect of the woodland management works, however, given the existence of the Tree Preservation Order, the matter requires coordination with the Local Planning Authority before the licence can be fully issued.

Relevance to the Proposed Local Green Space Designation

The significance of this evidence in the context of the proposed Local Green Space designation is material.

The evidence base supporting LGS21 places substantial reliance upon:

- the quality and amenity value of the woodland;
- the ecological significance of the site;
- and the contribution of the tree stock to the setting of the town.

However, the professional woodland management evidence now before the Examiner demonstrates that:

- large parts of the woodland are in declining condition;
- substantial felling is considered necessary as part of responsible woodland management;
- significant proportions of the existing tree stock are affected by Ash Dieback or structural decline; and
- active intervention is required to secure the long-term future and resilience of the woodland.

That evidence sits uneasily alongside the suggestion within the Neighbourhood Plan evidence base that the site comprises a uniformly high-quality woodland resource of exceptional local significance.

Importantly, the Forestry Commission — the statutory body responsible for woodland management and felling control — appears satisfied that extensive woodland management operations are appropriate in principle.

This does not diminish the value of the woodland generally; however, it does demonstrate that the condition, composition, and quality of the woodland is materially more complex and dynamic than suggested within the Local Green Space assessment.

Tree Preservation Order

As discussed during the hearing sessions, the Tree Preservation Order itself had not previously been placed before the Examiner. A copy is now enclosed.

The Order applies to:

“Trees of whatever species within the area marked A1”.

The TPO is therefore an area-based woodland designation rather than an Order identifying specific individual trees or clearly defined groups of trees of particular arboricultural merit.

Importantly, the Order schedule contains no detailed assessment of:

- individual specimens;
- species composition;
- condition;
- arboricultural quality;
- public amenity contribution; or
- management requirements.

Nor is the TPO supported by any detailed tree survey within the evidence presently before the Examination.

That is relevant because the existence of a TPO does not, in itself, demonstrate that land meets the strict requirements for Local Green Space designation under paragraphs 106 and 107 of the National Planning Policy Framework.

Rather, the TPO already provides a separate and existing mechanism for the control and protection of trees where appropriate.

Relationship Between Existing Protections and LGS Designation

This point also relates directly to Planning Practice Guidance Reference ID: 37-011-20140306, which requires consideration of whether any additional local benefit would arise where land is already subject to existing protective designations.

In this case:

- the site lies within the Cotswolds National Landscape;
 - the woodland is already subject to a Tree Preservation Order;
 - ecological considerations are capable of protection through separate legislation and policy mechanisms;
- and

- woodland operations are separately regulated through the Forestry Commission licensing regime.

The evidence before the Examination therefore demonstrates that multiple layers of environmental and landscape protection already apply to the site.

Against that background, the evidence base does not clearly explain what additional planning purpose or local benefit would arise from applying Local Green Space designation.

Conclusion

In summary, the enclosed woodland management evidence demonstrates that:

- substantial intervention and felling operations are considered necessary across large parts of the woodland;
- the Forestry Commission has reviewed those proposals positively in principle;
- the woodland is subject to ongoing active management and restructuring;
- and the condition of the woodland is materially more nuanced than suggested within the Local Green Space evidence base.

The enclosed material also confirms that the site already benefits from several existing layers of environmental and landscape protection, including the National Landscape designation, Tree Preservation Order controls, and Forestry Commission regulation.

In our submission, this further reinforces the position that the proposed Local Green Space designation is unnecessary, insufficiently evidenced, and duplicative of existing protections.

We trust the enclosed information is of assistance to the Examination process and would be pleased to provide any further clarification if required.

Yours Sincerely



Grant Baylis BSc (Hons), MSc, MRTPI, BwN Assessor
Associate Director

Morgan Elliot Planning

grantbaylis@morganelliott.co.uk

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