

Bronte Welham

From: Nicola Spencer on behalf of Planning
Sent: 02 February 2018 11:41
To: Planning Scanning; Planning.Responses
Subject: FW: Woodland Trust comments on application AB/148/17/PL
Attachments: Tortington Common planning application AB_148_17_PL.pdf

Nicola Spencer | Technical Support Manager, Planning Department, [Arun District Council](#) | Location: Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Save the environment - think before you print.

Sent: 31 January 2018 12:12
To: Planning; Anita Gardner
Subject: Woodland Trust comments on application AB/148/17/PL

Dear Mrs Gardner,

Please find attached the Woodland Trust's comments on planning application AB/148/17/PL.

Would you be able to confirm that Natural England, as a statutory consultee where ancient woodland is impacted, has been contacted and asked to provide comment on this application?

We hope you find our comments to be of use to you. Please do not hesitate to get in contact with the Trust if you have any questions or concerns regarding the comments we have provided.

Best regards,
Jack

Jack Taylor
Campaigner - Ancient Woodland

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
woodlandtrust.org.uk



WOODLAND
TRUST

Stand up for trees

The Woodland Trust is a charity registered in England (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee.

Registered in England No. 1982873.

Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>



The Woodland Trust
Kempton Way
Grantham
Lincolnshire
NG31 6LL

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

31st January 2018

Dear Mrs Gardner,

Planning application: AB/148/17/PL

**Proposal: To provide 4 No. detached houses on existing semi natural woodland site. |
Wooded Land South West of Dalloway Road, Arundel**

As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved. We own over 1,000 sites across the UK, covering around 24,000 hectares (59,000 acres) and we have 500,000 members and supporters.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least 1600 AD. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. We aim to prevent damage, fragmentation and loss of these finite irreplaceable sites.

The woodland Trust **objects** to this application on the basis of damage and loss to a section of ancient woodland called Tortington Common (grid ref: TQ004064), off Dalloway Road. This area of woodland is designated as Ancient Semi-Natural Woodland (ASNW) on Natural England's Ancient Woodland Inventory (AWI).

Planning policy

National Planning Policy Framework, paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

The Arun District Local Plan (2003) states in 'Policy GEN28 Trees and Woodlands':
"Development will not be permitted if it would damage or destroy one or more trees protected by a tree preservation order, identified as ancient woodland or in a conservation area unless: the removal of one or more trees would be in the interests of good arboricultural practice; or the benefits of the proposed development outweigh the amenity value of the protected trees."

Natural England is the Government's advisory body on matters of ancient woodland and is a Statutory Consultee where ancient woodland is to be impacted. Natural England's Standing Advice for Ancient Woodland and Veteran Trees¹ states: "Ancient woodland, and trees classed as 'ancient', 'veteran' or 'aged' are irreplaceable. Ancient woodland takes hundreds of years to establish and is considered important for its wildlife, soils, recreational value, and cultural, historical and landscape value."

The Housing White Paper published on 7th February 2017 further shows the government's intent to improve planning protections for ancient woodland. This revised protection reinforces the approach set out in paragraph 118 (as set out above) to restrict development of ancient woodland as to do so would be contrary to the National Planning Policy Framework presumption in favour of sustainable development (as set out in paragraph 14).

Impacts on ancient woodland

The proposal in question involves the construction of 4 detached houses entirely within an area of ancient woodland totalling approximately 0.5 hectares. This ancient woodland represents a small section of the larger Tortington Common ancient woodland complex. The construction of these houses within this area of ancient woodland would totally devastate it and effectively result in its total loss. We have the following concerns:

- Direct destruction of ancient woodland, including the irreplaceable soil and precious habitat.
- Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- Development resulting in the introduction and colonisation of non-native plants.
- Noise and light pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Where gardens abut woodland or the site is readily accessible to nearby housing, there is an unfortunate tendency for garden waste to be dumped in woodland and for adjacent landowners to extend garden areas into the woodland.

¹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

Development in ancient woodland can lead to long-term changes in species composition, particularly ground flora and sensitive fauna, i.e. nesting birds, mammals and reptiles. The construction of these 4 houses and other associated works such as gardens and driveways will result in the removal of most of the ancient woodland habitat and loss of the irreplaceable soils, effectively reducing the ancient woodland to a strip of trees. This destruction coupled with the inevitable, and majorly adverse, indirect impacts as listed above will result in the entirety of this irreplaceable ancient woodland being lost.

As well as direct loss the indirect impacts on the ancient woodland would be numerous and severe. Noise, light and dust pollution would all occur during both the construction and operational phases of a development such as this.

Noise and light pollution can be particularly impactful on woodland wildlife. Residential development near or, in this case, within ancient woodland will result in elevated noise and light levels. Noise pollution limits the distribution of sensitive animal species that are intolerant of noise – studies have shown that bird diversity in particular has been found to be lower in noisier sites. Light pollution affects the foraging, reproduction, communication, and other behaviour of wildlife, particularly those of a crepuscular or nocturnal nature, such as moths, bats and certain species of birds.

Dust pollution from the construction of these four houses would also result in direct deposition within the surrounding ancient woodland. Flora within ancient woodland is particularly sensitive to dust, from trees to ground flora to lichens. Studies have shown that flora suffers from reductions in height, shoot and root growth, with the composition of woods being fundamentally changed by dust deposition.

In their ecological appraisal the applicants have identified the range of habitat present within this section of woodland that would provide suitable habitat for wildlife and also identified species that are known to be present in the surrounding area, including rare invertebrates (i.e. stag beetles), dormice, bats, reptiles and more. Habitat such as mature and dead trees featuring cracks and fissures would be ideal for many of these rare and important species, particularly roosting bats and saproxylic invertebrates. The applicants have failed however to provide appropriate wildlife surveys for this section of ancient woodland though considering known wildlife in the area it is clear that this area of ancient woodland is a vital part of the wider ancient woodland complex and its loss would be highly deleterious.

The loss of ancient woodland cannot be mitigated as it is an irreplaceable habitat and as such ancient woodland is a completely inappropriate and wholly unacceptable location for any form of development. There is no way in which the impacts on the ancient woodland could

be mitigated in this case as the development involves direct removal of ancient woodland. The development will have further reaching consequences for the natural environment and particularly other areas of ancient woodland.

Conclusion

Ancient woodland is irreplaceable; once lost it cannot be recreated. Any development resulting in damage or loss to ancient woodland is unacceptable and must be avoided at all costs.

In summary, the Trust **objects** to the proposed development on the basis of damage and loss to ancient woodland. The construction of four houses in this small area of ancient woodland would totally devastate the wood and the wildlife that uses it. This application clearly contravenes both national and local policy designed to protect irreplaceable ancient woodland. In simple terms these houses do not have to be located in ancient woodland and therefore should not be sited here.

We hope you find our comments to be of use to you. If you are concerned about any of the comments raised by the Trust then please do not hesitate to get in contact with us.

Yours sincerely,

Jack Taylor
Campaigner – Ancient Woodland