

[REDACTED]

From: [REDACTED]
Sent: 03 April 2018 11:57
To: Planning; Anita Gardner
Cc: [REDACTED]
Subject: Woodland Trust further comments on application AB/148/17/PL

Dear Mrs Gardner,

Please find attached the Woodland Trust's further comments on application AB/148/17/PL following the submission of further information by the applicant.

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

[REDACTED]

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL

[REDACTED]



Stand up for trees

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Arun Civic Centre
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3rd April 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**

The Trust has been made aware of further comments submitted by the applicants (dated 2 March 2018) to response to concerns about the loss of ancient woodland that the planned development would result in.

We consider that the comments provided by the developer demonstrate a fundamental misunderstanding of the significance of the impact of the proposed development on ancient woodland. The development will result in loss and damage to this section of the irreplaceable ancient woodland of Tortington Common (grid ref: TQ004064).

Ancient woodland is irreplaceable and this is recognised in planning policy. It has taken centuries, sometimes millennia, to develop and evolve into the valuable and important habitat that can be seen today. The relatively undisturbed nature of ancient woodland allows it to provide a home for sensitive fauna and flora threatened by increasing urbanisation.

The applicant has stated in their recent letter that they wish to correct some misconceptions around the comments from interested parties. All the comments within the section titled 'Environment, Fauna and Flora' demonstrate a failing of the applicant to understand the significance of ancient woodland habitat, and the impact the proposed development will have on it.

The applicant states that "the actual loss of open space is less than 10% of the site area and the dwellings are located and design in such a manor [sic] as to minimise the loss of mature trees". Any loss (10% or otherwise) of ancient woodland is wholly unacceptable. While mature trees can be retained in gardens the intensification of human activity will destroy all other ancient woodland features within the garden areas. While there may not be direct land

take across the whole of the ancient woodland, this development and the large increase in indirect impacts will effectively result in the entirety of this ancient woodland area being lost.

It is a misconception that ancient woodland is defined by mature trees. Ancient woodland typically has a varied age structure of trees on account of historical management and the processes of natural decline and regeneration. It is the ancient woodland soils that provide the foundation for ancient woodland species to flourish. Therefore, the siting of the dwellings, along with the driveways and gardens will result in the destruction of this ancient woodland.

It is of grave concern to the Trust that the applicant believes that this proposal, one resulting in damage and loss to irreplaceable habitat, should be considered as an exemplar of good environmental design. To describe a scheme that destroys ancient woodland as an example of good environmental design is oxymoronic.

This development clearly contravenes both national and local planning policy designed to protect ancient woodland. Further to existing policy, the Government recently published (5 March 2018) the draft revised National Planning Policy Framework, which further outlines the Government's commitment to improving protection for ancient woodland through the planning system. It states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists." This wording is a clear recognition from the Government of ancient woodland's importance and better need for protection. There is no "wholly exceptional" reason for these houses to be in this location.

The Woodland Trust **strongly objects** to the proposed development. The applicant has demonstrated a fundamental misunderstanding of ancient woodland. Allowing a development proposing the destruction of ancient woodland would set a dangerous precedent and would fly in the face of policy designed to protect these important and irreplaceable habitats. As stated in our previous response, these houses do not have to be located in ancient woodland and must be moved outside of and away from ancient woodland.

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