

Objection

Whilst I am not against the principle of the development, **I am against the unnecessary removal of trees and feel greater protection should be given to those that are currently subject to a TPO.**

The early mature trees that surround Pound Place are of a substantial height and prominence and provide a beneficial effect in separating housing developments, thereby enhancing people's appreciation of the area whilst contributing to the 'green' character of the area more generally. They also provide an arboreal buffer that helps protect the setting of the South Downs National Park, a duty that ADC is obliged to consider and also provides a wildlife habitat.

The Government's Tree Health Resilience Strategy commits to building more homes, but also seeks to embed a principle of net environmental gain from development. The Town and Country Planning Act 1990 places a statutory duty on Local Authorities "to ensure whenever it is appropriate that in granting planning permission for any development, adequate provision is made by the imposition of conditions for the preservation or planting of trees". It is my contention that too little emphasis has been placed upon the '**preservation**' of these trees.

I note the applicant has reduced the amount of trees that they wish to remove, which is to be welcomed, but I question the necessity to remove those on the Eastern & Western Boundary. These trees contribute to the visual amenity as viewed from public space on Roundstone Lane, the separation of developments of the Swanbourne Park estate and both boundaries contribute to the shielding of the views from the South Downs National Park and in consequence the reduction of light pollution for the designated Dark Skies Reserve. In terms of light pollution, this Care Home will be illuminated throughout the hours of darkness. The trees are also of a generally healthy condition with no signs of disease or pests as stated in the original Arboricultural report.



I refer to the attached image above which is a view from the Highdown towards Roundstone Lane and the rugby posts of Worthing RFC can be clearly seen. This picture illustrates the screening capacity of the tree line which reduces the impact of the Bramley Green development to glimpses of roof lines.

The picture below is of the tree line of Pound Place / Roundstone Lane taken from the same position on Highdown. This clearly illustrates the screening effect the Pound Place boundary trees have. The trees below the red line are those on the Western Boundary of Pound Place.



The applicant also seeks to justify the removal of the trees on the Western boundary abutting Roundstone Lane by suggesting the visibility splays would be compromised without removal of the trees. The picture above was taken from 2 metres inside the kerb line outside Pound Place and clearly shows the visibility looking North and the Speed Table. The visibility could be increased by clearing the scrub on the verge of Roundstone Lane.

The picture below was also taken 2 metres from the kerb line and shows the visibility looking South and another Speed Table.



It should be noted that the Road Safety Audit by the applicant took place in May 2018, prior to the introduction of traffic calming in this road. Speed tables were constructed either side of the entrance to Pound Place and a speed restriction of 20 mph has been imposed.



With reference to the gradient of the bank and the need to lay a pavement north / south on the East side of Roundstone Lane, the picture above illustrates the existing footway between Brougham Grove and Pound Place where a low-level retaining structure has been put in place. If a similar principle was applied to the footway either side of Pound Place, this will avoid undermining the root structure of the boundary trees and negate another reason for their removal.

The applicants intention on replacement planting elsewhere than the boundary appears minimal in respect of the height of the saplings proposed. However, even with 2-1 replacement planting, I would suggest there will not be a net environmental gain for perhaps twenty years. It would seem necessary to specify much larger replacement trees if tree removal was considered necessary with more native evergreen such as Holly or Yew rather than just deciduous Malice.

The NPPF also recognises the importance of non-ancient woods and trees and the Government's 25 Year Environment Plan argues for the safeguarding and enhancing the beauty of our natural scenery and improving its environmental value. The unnecessary removal of healthy trees does not seem to equate with these commitments.

The trees surrounding Pound Place are one of the last remaining corridors and shelters on the East side of Roundstone Lane. The numerous ecology reports that supported the recent development of Swanbourne Park and Pound Nursery indicated an abundance of birds and several species of Bats. These included twelve bird species of Conservation Concern under the UK BAP (Bio-diversity Action Plan) and were listed in Table 2 of the report. The applicant is disingenuous to suggest that birds such as the Dunnock, Song Thrush, Linnet and Mistle Thrush which are breeding locally and are considered to be of value within the Zone of Influence for local bird populations, are not present in the Pound Place habitat.

Finally, the recent validation of Arun's Local Plan by the Government Inspector noted a deficiency that required Arun to include the "protection and enhancement of the setting of the national park" be added as a **Local Plan objective**.

The SDNPA's statutory role and Arun's responsibilities were emphasised and strengthened by **both** government Inspectors, resulting in the re-wording of Policy **LAN DM1 Landscape** to provide "sufficient distinction between protection of the setting of the landscape with the highest status of protection, given to the SDNP". This was re-emphasised again in the Inspector's final report, and Policy **QE DM2 Light Pollution** which now includes specific reference the SDNP's designation as an International Dark Skies Reserve.

I would request that sufficient regard is given to these policies.

Anthony Cross
2 Bramley Cottages
Roundstone Lane
Angmering
BN16 4FJ