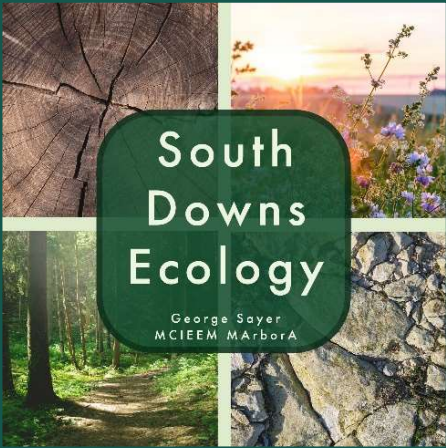




Ancient Woodland Mitigation Strategy

Proposals at Furnace
Lakes, Slinfold



**South
Downs
Ecology**

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1.0 Introduction

- 1.1 The applicant has commissioned a walkover update and an Ancient Woodland Mitigation Strategy for proposals at Furnace Lakes, Slinfold. A walkover update was undertaken by George Sayer MCIEEM MArbor of South Downs Ecology on 14th May 2025.
- 1.2 This document details a walkover update of the site and provides a strategy for Mitigation of the minor loss of existing Ancient Woodland as part of the proposals.
- 1.3 The proposals are restrospective and for the siting of a small number of shepherd's huts around one part of a lake, with associated changes to access and landscape.

2.0 AEWc Assessment 2024

- 2.1 The assessment undertaken in 2024 by AEWc concluded that trees in the area of interest, which is designated as Ancient Woodland were cleared by a previous owner between 2013-2018.

3.0 Walkover Survey Results

- 3.1 The site was found to be in largely the same condition as during the 2024 surveys. There are a small number of non-native shrubs planted including around the huts and along the fenceline. The fenceline appears to contain natives such as hornbeam and ornamentals such as pyracantha.
- 3.2 The remaining areas are being left to revegetate but currently are not representative of ancient woodland. Some species which spread slowly and are ancient woodland indicators such as wood anemone are present on the edge of site. The dry spring and summer in 2025 are likely slowing the colonisation of this area this season.
- 3.3 The glade to the east of the proposal area falls in the ancient woodland designation but is actually a modified grassland at present. The area is devoid of shrubs with only overhanging tree canopies from the adjacent woodland.

4.0 Comments on Planning Application

- 4.1 Horsham District Planning Application DC/24/1959 was submitted in December 2024 and refused in March 2025. The application was for: "Removal of 9No. fishing swims and the siting of 3 shepherds huts for use as holiday accommodation (Class C3) together with associated works."
- 4.2 Reason 2 of the refusal was: "It has not been demonstrated to the satisfaction of the Local Planning Authority that the groundworks of the development and future pressure associated with the proposed recreational usage would not result in adverse impact on the designated Ancient Woodland, contrary to Policy 31 of the Horsham District Planning Framework (2015) and Paragraph 193 of the National Planning Policy Framework (2024)."
- 4.3 The ecological consultee, Place Services stated in their response that: "...We support the 15m buffer between the works and the ancient woodland to the east of the site in accordance with Government Standing Advice. This should be secured by a condition of any consent. We are satisfied that there is sufficient ecological information available for determination..."
- 4.4 The Arboricultural consultee, Andy Clout (of HDC) commented that: "I recommend that the application be withdrawn or refused as appropriate on grounds of direct loss of a section of Ancient woodland (AW), from the physical change associated with the pre-emptive extent of groundworks and the associated future pressures associated with the proposed recreational usage, contrary to the NPPF guidance. I recommend that the development be-relocated as appropriate in planning terms to a less landscape sensitive area of the site and the AW be left to re-colonise with indigenous species.... It is apparent from available imagery that the development area has been denuded of all woodland understorey vegetation and the majority of the woodland trees over the course of approximately the last decade. Some recent planting of ornamental species has occurred as part of the urbanisation of the site. Pre-emptive denudation of AW is not a sound reason for permitting subsequent development. The land remains subject of AW designation until such time as Natural England deem otherwise. Provided underlying soils have not been destroyed, the woodland could likely re-colonise given time."
- 4.5 The following aims to respond to the concerns, raised by the Arboricultural officer and to ensure that proposals do not result in a loss of ancient woodland overall.

5.0 Further Context and Response to Arboricultural Comments

- 5.1 The description of the site being 'denuded over the past 10 years' is not accurate, as the aerial imagery clearly shows a discrete action of clearance and installation of hardcore fishing swims between 2013-2018. Since then little change has occurred, and as part of these proposals, much of the hardcore has been removed and replaced with woodchip.
- 5.2 It appears the use of this area is well established, both by the previous planning application and by the general use for fishing. Clearance of the bankside occurred between 2013-2018 and by a previous owner. Whilst this is not grounds for considering the woodland to be of less value, it is an established fact that the area has been in regular permitted use throughout this time. The proposals do not further degrade this but seek to reduce the degraded area.
- 5.3 Whilst the tree officer is correct in that pre-emptive works should not justify such an application, the works which would have caused harm to the AW were historic, unrelated to this application, and the site was already in use for fishing accommodation long prior to this application. The actions were not undertaken by the applicant.
- 5.4 The clearance works were undertaken before the January 2020 cutoff date, currently considered as relevant to BNG proposals (as this was the date of the announcement of the Environment Act 2021). Whilst this is not a direct equivalent, as ancient woodland was protected prior to the Environment Act, is a reasonable proxy for how far into the past it is reasonable to consider degradation. The degradation occurred at a minimum 7 years ago and potentially up to 12 years ago. The BNG assessment for the proposals has (we presume) been accepted by HDC as acceptable.
- 5.5 The quantum of surfaced land in the application is reduced compared to the baseline here before. Areas of hardcore originally installed for fishing have either been removed and returned to soil, or replaced with more appropriate loose woodchip. The proposals also seek to reduce the number of users who visit this area of the site compared to an existing baseline. This would have the effect of reducing indirect disturbance e.g. of bats within the woodland edge. Likewise, the change from camping to huts would reduce incidental lightspill as tents would allow e.g. headtorch light through.
- 5.6 The ancient woodland designation on MAGIC runs all the way down to the carpark and includes both a smaller glade as well as the larger grassed area north-east of the parking. It is therefore not currently an accurate predictor of true ancient woodland at this site.
- 5.7 A footpath runs along the eastern boundary of the redline area, which already creates a line of disturbance here within the woodland and a relatively clear boundary beyond which the habitat was likely subject to disturbance and degradation even before 2013.

6.0 Ancient Woodland Mitigation Strategy

Outline

- 6.1 The following mitigation strategy is designed to aid the proposals in according with relevant legislation and best practice guidance.
- 6.2 The mitigation hierarchy for Biodiversity generally adopted under BS42020:2013 and NPPF paragraph 180a is being applied through the proposals:
- Avoidance - There is no appropriate alternative location for the proposals especially as the disturbing works have already occurred years ago, and the shepherd's huts by their nature need to be both away from the broader woodland and adjacent the fishing lake. Design of the huts, paths etc. avoids impacts such as lightspill. Hedge planting will over time reduce the potential for impacts to the broader woodland.
 - Mitigation - Planting improvements will reduce the impacts of disturbance here to well below the original baseline. Removal of invasive species and re-planting of natives will help mitigate any loss, as will the removal of hard surfaces and overall reduction of land-take for fishing users. Mitigation will not fully result in no net disturbance of ancient woodland, hence the need for:
 - Compensation and Enhancement - new habitats as described below could not only compensate for some minor historic loss and degradation, but result in a significant gain for habitats (including AW) and species over time.

Mitigation in the Proposal Site

- 6.3 Non-native shrubs such as pyracantha and rhododendron should be removed, and replaced with native species such as guelder rose, spindle and alder buckthorn, which will provide visual amenity still but are native woodland species which will thrive on such soils. These will ultimately soften the visual impact of the huts and provide habitat for invertebrates and small birds.
- 6.4 The boundary with the footpath contains a part-native hedge, which should be infilled with native species to mitigate disturbance and form a buffer here. Once this establishes it will provide a buffer to disturbance, both from the shepherd's huts and from the footpath back towards the lake.
- 6.5 The banked and cleared areas around the huts should be allowed to revegetate naturally, which is already occurring. Woodchip will degrade and form a basis of soil suitable for woodland vegetation to re-establish. Areas which struggle to develop could be piled with leaf mulch from the adjacent ancient woodland, to allow fungi, invertebrates and seeds to disperse more easily.

Enhancement – Conversion of Modified Grassland Glade to Woodland/Wooded Glade

- 6.6 The grassland glade, falling within the AW designation could reasonably be restored to a woodland glade. This could be achieved by sparse planting of native trees and pockets of shrubs, heavy mowing and removal of arisings, and seeding with a woodland wildflower mix. Following this, annual cuts in August would allow the vegetation to develop more naturally and form a complement to the surrounding woodland. Marginal areas shall not be cut, providing initially dense thatch and ultimately, the opportunity for trees and shrubs to naturally seed or sucker outwards into the glade. Piles of brash and deadwood around the margins would support birds, reptiles, insects and mammals.
- 6.7 The area of grassland enhanced would be much more than any area lost on the proposal site. This area is designated as ancient woodland but has been managed as mown grassland for some time. The area could be restored to ancient woodland. This would accord with the current gov.uk standing advice as a method of compensation. Given the established and ongoing permitted use of the land adjacent the lake, full restoration of this part of the woodland would be impractical; however, partial restoration alongside restoration of this glade would present a net gain over time.

Securing of Mitigation and Enhancement

- 6.8 At present, there is no impetus to restore this glade to an ancient woodland glade. This proposal offers the opportunity to do so and to secure this in perpetuity.
- 6.9 The enhancement and ongoing management as discussed above could be secured by planning condition or even a S106 agreement or Conservation Covenant to create and manage the new woodland area in 'perpetuity', and manage the areas surrounding the shepherd's huts appropriately. The relevant agreement would be tied to a more detailed habitat creation, management and monitoring plan detailing responsibilities, habitat prescriptions, detailed plans and planting specifications. Such an agreement should cover 20-30 years, to reflect the current Mandatory Biodiversity Net Gain requirements and to allow such time, that trees planted would be relatively mature and as such difficult and costly to remove. Such works would also by this point be readily visible from aerial imagery and as such, easy to monitor. As such this could be secured legally.

7.0 Site Photos

View of areas previously laid to hardcore where this has been removed, with habitats regenerating.



Hedge along the footpath.



Example of fishing swims being returned from hardcore to woodchip, vegetation re-establishing.



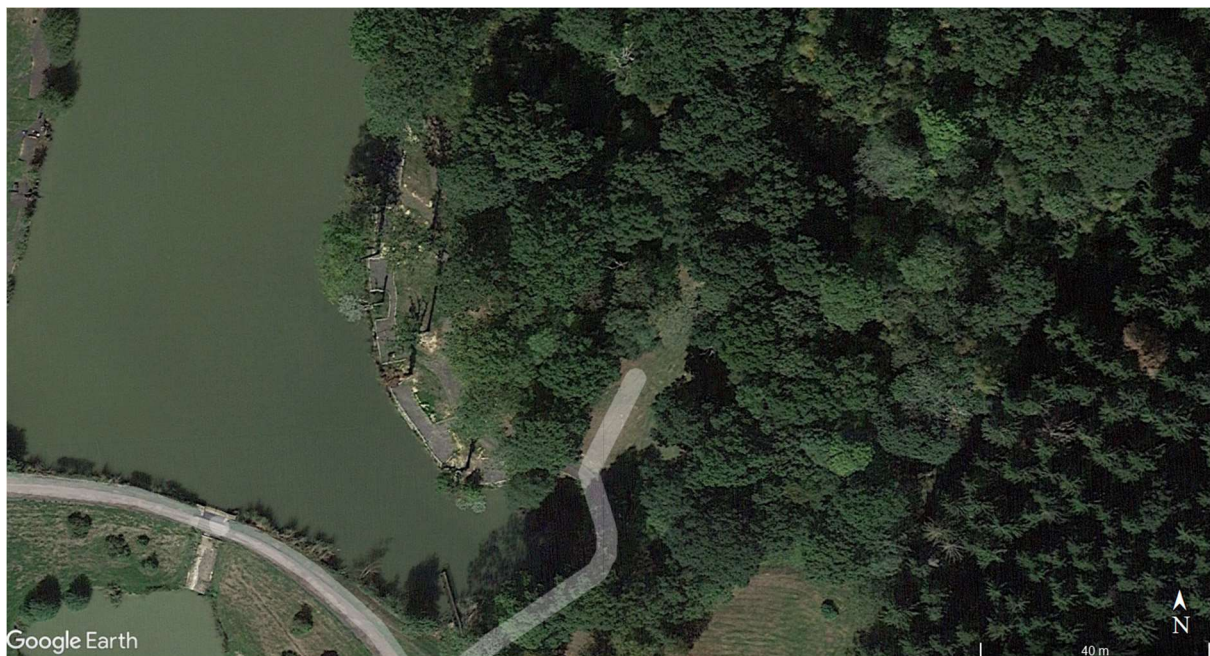
Grassland glade proposed to be converted to a woodland glade.



Aerial Imagery from 2005 (Google Earth 2005) showing the glade has been here for some time as mown grassland.



Aerial Imagery from 2018 (Google Earth 2018) showing the glade and the works around the lake – note the grey hardcore areas.



Aerial Imagery from June 2025 (Google Earth 2025) showing the glade now.

N.B. the canopies of surrounding woodland make the glade appear much small than it is in reality.

Note the brown area where hardcore has now been removed.



8.0 Figure No. 01 – Indicative Woodland Glade Enhancement Plan

