



## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Horsham District Council – Planning Dept                                                                  |
| <b>LOCATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | St Johns Farm, Trout Lane, Brooks Green                                                                   |
| <b>DESCRIPTION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Demolition of existing buildings. Erection of 4no dwelling houses with associated parking and landscaping |
| <b>REFERENCE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | DC-26-0703                                                                                                |
| <b>RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Refusal                                                                                                   |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                           |
| <p>The proposed change of use and new development is partially within the minimum recommended buffer to the immediately adjacent "Madgeland Wood". The woodland is designated as Ancient Woodland (AW) and thus recognised as an irreplaceable landscape resource requiring planning/design of all new development to conserve and enhance the habitat it provides.</p> <p>The provision of new habitable dwellings in very close proximity to the woodland edge, with associated amenity areas within the minimum recommended buffer zone (15m) to the woodland edge, is contrary to local and national planning policy recommendations for design of new development.</p> <p>New proposals for residential development within the countryside must respect the key landscape constraints and comply as a minimum, with the recommendations of the NPPF for the conservation and enhancement of Ancient Woodland and the habitats it provides.</p> |                                                                                                           |
| <b>MAIN COMMENTS:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                           |
| <p>The applicant has provided a statement from their arboriculturist in response to my comments regarding the appropriateness of new residential development within the minimum recommended buffer to AW.</p> <p>Current Gov't guidance in this respect (via Natural England and the Forestry Commission) is comparatively clear hence I have included below some of the key considerations:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                           |

## **Use of buffer zones**

Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the:

- scale and type of development and its effect on ancient woodland, ancient and veteran trees
- character of the surrounding area

For example, larger buffer zones are more likely to be needed if the surrounding area is:

- less densely wooded
- close to residential areas
- steeply sloped

## **Buffer zone recommendations**

**For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland** to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

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Where possible, a buffer zone should:

- **contribute to wider ecological networks**
- **be part of the green infrastructure of the area**

**A buffer zone should consist of semi-natural habitats such as:**

- **woodland**
- **a mix of scrub, grassland, heathland and wetland**

**The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.**

**You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.**

**You should not approve development proposals, including gardens, within a buffer zone.**

There is currently no habitable development or associated garden space within the recommended buffer to the Ancient Woodland at the site. Irrespective of the current existing condition of the land within the buffer or the immediately adjoining woodland itself, the change of use to habitable domestication would not include the minimum recommended naturalised buffer to new habitable development. Indeed it would not provide any buffer at all in places.

The development would foreseeably have **indirect** impacts on the longer-term integrity of the woodland for reasons as outlined in the relevant Gov't guidance:

**Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:**

- breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects
- reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species
- reducing the resilience of the woodland or trees and making them more vulnerable to change
- increasing the amount of dust, light, water, air and soil pollution
- increasing disturbance to wildlife, such as noise from additional people and traffic
- increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas
- increasing damaging activities like fly-tipping and the impact of domestic pets
- increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration
- changing the landscape character of the area

Buffer zones are considered to be an important part of any change of land use in the countryside adjacent to irreplaceable landscape habitats including designated Ancient Woodland. There is no "wholly exceptional" reason to allow a divergence from the ethos of the NPPF in this respect.

**ANY RECOMMENDED CONDITIONS:**

N/A

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|--------------------|-------------------------------------------|
| <b>NAME:</b>       | ANDY CLOUT – ASST. ARBORICULTURAL OFFICER |
| <b>DEPARTMENT:</b> | STRATEGIC PLANNING - SPECIALISTS          |
| <b>DATE:</b>       | 24/06/26                                  |