

South East and London Area Team

Bucks Horn Oak
Farnham
Surrey
GU10 4LS

Tel: 0300 067 4420

planningconsultationSEL@forestrycommission.gov

Bethan Tinning
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Via email to: planning@horsham.gov.uk

17 September 2026

Dear Ms Tinning,

Your reference: DC/26/0924

Site: Lock House Lock Partridge Green West Sussex RH13 8EG

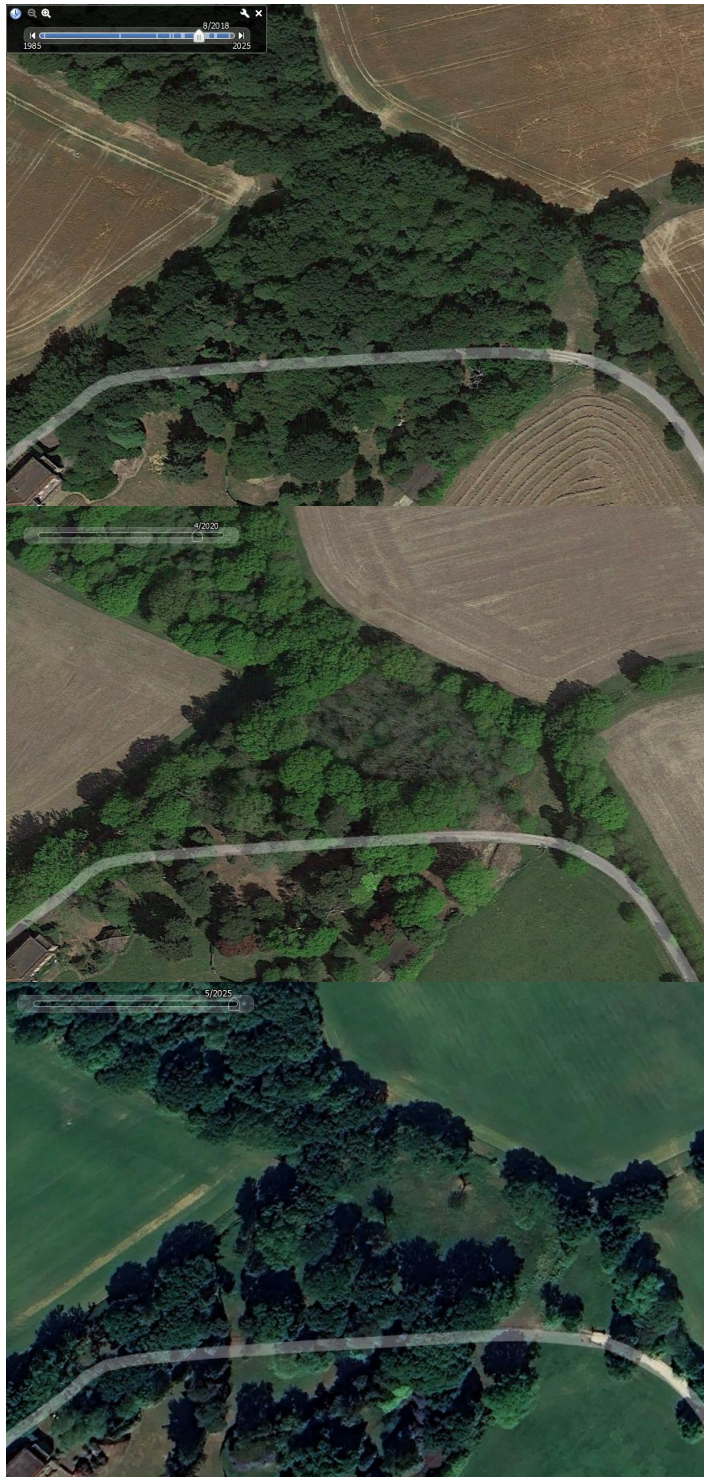
This planning application has been brought to our attention due to the proximity to ancient woodland.

As a Non-Ministerial Government Department, we do not provide an opinion supporting or objecting to planning applications. Instead, we provide advice on the potential impact that proposed developments could have on trees and woodland using our local knowledge and expertise, planning policy and legislation that could be relevant and measures that could help to avoid or limit impacts and result in gains where possible.

The site sits adjacent to Hookshile Wood and Grant's Copse, Ancient and Semi-Natural Woodland (ASNW) which satellite imagery shows has suffered significant tree loss since 2020, see Figure 1 overleaf. No felling licence has been issued for the area.

It is important to note that ancient woodland is an irreplaceable habitat and Policy N6 (2) of the National Planning Policy Framework (August 2026) states that:

*"Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or **deterioration of irreplaceable habitats** (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."*



2018

2020

2025

Fig 1: Satellite imagery, from Google Earth, shows significant tree loss in Grant's Copse since 2020. No felling licence has been issued for the area.

The Natural England and Forestry Commission 'Standing Advice' for ancient woodland, ancient trees and veteran trees is a material planning consideration for local planning authorities.

We are concerned about the deterioration that the ancient woodland has already suffered and may experience further because of this proposed development.

We fully support the Arboricultural Officer's statement dated 26 August 2026. Increasing the size of the ancient woodland buffer by moving the proposed building further away would provide greater protection to the woodland. Whether the buffer is 15m or greater, for the buffer to provide adequate protection to the woodland it needs to be:

- A **high-quality semi-natural buffer**, comprising native woodland planting, scattered trees, scrub and species-rich grassland to form a graded woodland edge; and
- An area **free from built development, hard surfacing and recreational infrastructure**.

We would also recommend the implementation of measures to **discourage informal access** (including by domestic pets) to the woodland and buffer area, including thorny native shrub planting and appropriate signage.

Furthermore, we would like to see Grants Copse restocked with native broadleaf species, including an understorey of shrubs, and managed effectively, in line with the UK Forestry Standard (UKFS), to improve its condition. A Forestry Commission approved woodland management plan should be developed and implemented, we are happy to advise the applicant on this plan.

Detailed comments are provided in Annex 1.

Given that ancient woodland is an irreplaceable habitat, every opportunity should be taken to ensure that buffer design, management and long-term stewardship contribute to its protection from further deterioration.

Further guidance on policy and legislation relevant to ancient woodland is set out in Annex 2. If you have any questions regarding our advice or concerns that are not covered by the above, please contact us.

Yours sincerely,

Annie Weddle
Local Partnership Advisor

Annex 1: Detailed comments

Ancient woodlands, ancient trees and veteran trees are irreplaceable habitats. Policy N6 (2) of the NPPF sets out that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. In considering the impacts of the development on Ancient Woodland the planning authority should consider direct and indirect impacts resulting from both construction and operational phases. Impacts can be caused by activities outside of areas designated as ancient woodland (e.g. within buffer zones), or within open areas of ancient woodland, which can result in loss or deterioration of ancient woodland.

Please refer to Natural England and Forestry Commission joint Standing Advice for Ancient Woodland and Ancient and Veteran Trees. The Standing Advice can be a material consideration for planning decisions and contains advice and guidance on assessing the effects of development, and how to avoid and mitigate impacts. It also includes an Assessment Guide which can help planners assess the impact of the proposed development on ancient woodland or ancient and veteran trees in line with the NPPF.

The Town and Country Planning (Consultation) (England) Direction 2024 (published January 2024) requires local planning authorities in England to consult the Secretary of State before granting planning permission for certain types of development, including development that affects ancient woodland: The Town and Country Planning (Consultation) (England) Direction 2024 - GOV.UK (www.gov.uk)

We note the inclusion of a 15m buffer to the ancient woodland within this development proposal. However, the 15m distance set out in Standing Advice represents a minimum starting point for any development adjacent to ancient woodland, regardless of woodland condition. Given the deterioration that the woodland has already suffered and the additional pressures the proposed development is likely to place on this irreplaceable habitat, we strongly encourage the provision of a high-quality semi-natural buffer to the ancient woodland. This type of buffer creates a gradual transition between development and ancient woodland. We encourage the creation of a graded woodland edge incorporating native woodland planting, scattered trees, scrub and species-rich grassland. These habitats can help mitigate edge effects associated with development, such as increased light levels, recreational pressure, nutrient enrichment and the spread of invasive species, while improving ecological resilience.

The inclusion of densely planted native thorny shrub species would help deter informal access, reducing disturbance to the sensitive woodland habitats. Buffers should remain free from built development, hard surfacing and recreational infrastructure, including footpaths, to minimise both direct and indirect impacts on the ancient woodland. Appropriate signage should also be considered, it can play an important role in raising awareness of the importance and sensitivity of ancient woodland, explaining the reasons for access restrictions, and directing visitors towards more suitable areas of

open space. This approach can help reduce disturbance and support the long-term protection and enhancement of these nationally important habitats.

Annex 2: Policy Framework, Related Guidance and Sources of Further Information

Policy and Guidance:

Keepers of Time – A Statement of Policy for England’s Ancient and Native Woodland (updated May 2022). Includes definitions of ancient woodland, ancient and veteran trees, and sets out the importance of these habitats.

Policy Principles and Strategic Objectives include:

- *Maintaining and enhancing the existing area of ancient woodland*
- *Conserving and enhancing the existing resource of ancient and veteran trees.*

National Planning Policy Framework (published August 2026)

Policy N2 (1d) - existing natural features

Policy N3 – trees in new development

Policy N6 (2) – irreplaceable habitats

Standing Advice for Ancient Woodland and Veteran Trees (first published October 2014, revised January 2022)

This advice, issued jointly by Natural England and the Forestry Commission, is a material consideration for planning decisions across England. It provides advice on how to avoid and mitigate impacts, and on compensation schemes where the tests set out in the NPPF are met. The Standing Advice also includes an Assessment Guide, which can help planners assess the impact of the proposed development on the ancient woodland.

National Planning Practice Guidance – Natural Environment Guidance. (updated July 2019)

This Guidance outlines the Forestry Commission’s role as a non-statutory consultee and supports the implementation and interpretation of the National Planning Policy Framework in relation to ancient woodland and ancient and veteran trees, and clarifies that existing woodland condition should not affect the planning authority’s consideration of proposals.

Felling Licences and Environmental Impact Assessment

Felling Licences - Under the Forestry Act (1967) a Felling Licence is required for felling more than 5 cubic metres per calendar quarter. Failure to obtain a Licence may lead to prosecution and the issue of a restocking notice.

Environmental Impact Assessment - Under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended, some proposals involving afforestation, deforestation, forest roads or forestry quarries may require ‘stage 2’ Consent from the Forestry Commission before they can be carried out. For these project types the applicant should determine if their proposal needs Consent (referring to guidance as necessary), or approach the Forestry Commission for a ‘stage 1’ opinion as to whether or not Consent is required.