

Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

27th April 2026

Dear Matthew Porter

Reference: DC/26/0366

Proposal: Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure. | Land North West of Southwater

Thank you for consulting the Woodland Trust on this application. Please find a summary of our comments below, followed by further detail and advice. Our comments are based on a review of the information provided in the planning application. We are an evidence-led organisation, using our policy and planning expertise to assess impacts of development on ancient woodland and veteran trees.

Woodland Trust Position - Summary

The Trust **objects** to this application due to deterioration of four ancient woodlands designated as Ancient Semi Natural Woodland on Natural England's Ancient Woodland Inventory (AWI) in addition to deterioration of veteran trees: -

- Smith's Copse (grid ref: TQ 15646 27447)
- Courtland Wood (grid ref: TQ 15113 27252)
- Two Mile Ash Gill (grid ref: TQ 14922 27083)
- Sparrow Copse (grid ref: TQ 15064 29294)
- Deterioration of veteran ash tree T9 and potentially other veteran trees on site

We are also concerned about the proposal to construct a primary access road through a section of woodland at grid ref: TQ 15777 28238, designated as 'Long Established Woodland' on Natural England's Long Established Woodland Inventory. These woodlands have been present in England since at least 1893. Whilst not ancient, the woodlands have developed over many decades and as such have a rich biodiversity and often contain important old-growth features. It is important to protect these woodlands.

At Outline stage the applicant needs to demonstrate the feasibility of mitigating the following impacts on ancient woodland and veteran trees in the context of the proposed design parameters: -

- Deterioration of ancient woodland and veteran trees from intensified use of the land
- Habitat fragmentation and reduction in landscape connectivity
- Noise pollution and emissions from increases in traffic
- Hydrological impacts from changes to surface or groundwater flows

The applicant has not demonstrated the feasibility of mitigating impacts on the ancient woodlands and has not clearly committed to assessing impacts on veteran trees beyond root encroachment. Therefore, in its current form, the application is contrary to National Planning Policy Framework para 193 (c) and does not reflect Natural England and Forestry Commission's standing advice¹ (see Annex A for details).

We note that Natural England and Forestry Commission have also drawn attention to the aforementioned standing advice in their comments.

Further detail is provided below.

Impact on Ancient Woodland

The development would introduce a considerable number of new dwellings and associated infrastructure in close proximity to three areas of ancient woodland in a landscape comprising a large number of veteran and over mature/notable trees and hedgerows. Although not evident in the description of the development, it appears that the proposal seeks permission for up to 1,500 houses in addition to industrial and commercial infrastructure and learning facilities.

Intensified activity within and adjacent to ancient woodland

Smith's Copse (LWS) is bordered on its eastern side by existing urban development. A PROW runs along its northern boundary. The proposals would result in Smith's Copse being entirely surrounded by development, with housing to the southern and western boundaries and a primary school and nursery and allotments adjacent to the northern boundary.

Courtland Wood has a PROW within the woodland close to its eastern boundary, and also just outside of the woodland along its southern boundary. There are a number of trees within the woodland registered as Notable on the Trust's Ancient Tree Inventory². Two Mile Ash Gill is a long narrow woodland, approximately 20 metres wide for most of its length. A PROW cuts through the northern part of the woodland where it joins Courtland Wood.

This development has considerable potential to give rise to indirect impacts on ancient woodland such as noise, disturbance, vegetation damage, trampling, litter, removal of deadwood, fire damage, cat predation, and pollution and disturbance from dog walking.

The Arboricultural Impact Assessment (AIA) states that Courtland Wood would be provided with a 25 metre buffer and Smith's Copse with a 20 metre buffer. The buffer zone for Two Mile Ash Gill is not specified. Given the considerable scale of this development – 1,500 houses – it has not been demonstrated that providing a buffer width of just 5-10 metres more than the minimum specified in the standing advice would suffice to mitigate impacts.

¹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

² <http://www.ati.woodlandtrust.org.uk/>

We have not been able to find analysis or assessment to justify the proposed buffer widths. Such an analysis would need to consider the increased numbers of people, cats and dogs in the vicinity of the woodlands and likely activity; the balance between the extent of built areas, the width of buffer and availability of public open space; and likely patterns of activity in the light of the existing footpath network. The extent to which the buffer would be accessible to the public is a key consideration in reducing disturbance and establishing a functional ecological edge to the woodland. Decisions about whether access into buffer zones will be encouraged or deterred will also impact on the calculations of open space provision.

We note and agree with the Council's Arboricultural Officer that *"to avoid the condition of the woodlands deteriorating post-development, the woodlands and their buffer zones should be treated as areas of restricted public access."*

It is particularly important given the extent of development and the proposed network of footpaths that the Outline proposals are clear and backed up by analysis. Buffer provision needs to be understood in the context of the overall design of the scheme, provision of alternative open space, functional ecological corridors, and supporting mitigatory measures. Without this it is not possible to assess whether impacts can be mitigated.

Habitat fragmentation and reduction in landscape connectivity

The development will result in Smith's Copse and Courtland Wood being increasingly separated from each other and from adjacent semi-natural habitat. The AIA refers to a green corridor *"to create a link providing ecological connectivity between these woodlands."*

However, the Illustrative Masterplan shows that this corridor would be severed by an access road. It is not clear how Smith's Copse will remain linked to the wider landscape given the development proposed around it and the proposed location of roads and paths.

Without significant mitigation these changes have potential to impact the habitat connectivity and integrity of the ancient woodlands, and in particular affect the dispersal, feeding and nesting of species relying on woodland edge habitats and species using adjacent open ground. The applicant needs to demonstrate that the width of the buffer and the extent of connected undisturbed habitat will protect against gradual deterioration of the ecological condition of the ancient woodlands.

A primary access route will also cut through an area of Long Established Woodland (LEW) at grid ref: TQ 15777 28238. Natural England's Long Established Woodland Inventory can be found here [Long Established Woodland Inventory \(England\)](#). These woodlands have been present in England since at least 1893. Whilst not ancient, the woodlands have developed over many decades and as such have a rich biodiversity and often contain important old-growth features. It is important to protect these woodlands. These proposals will result in direct loss of LEW in addition to fragmenting an area of woodland that is already of limited size and narrow in width.

Traffic

Increased traffic in proximity to ancient woodland can lead to deterioration of the ecological condition of the woodland as a result of traffic emissions and traffic noise. Emissions may increase the deposition of air pollutants such as nitrogen oxide and ammonia, affecting soils, ground flora and vegetation. Noise pollution has potential to affect wildlife, including bats, insects and acoustic predators.

With regards to Sparrow Copse in particular, the proposal is for an adjacent car park. Although a 15 metre buffer should protect trees on the boundary of the ancient woodland from root encroachment, there is no supporting analysis to indicate that such a buffer width would protect the woodland from impacts associated with operational use of the car park.

The applicant needs to demonstrate that the increase in traffic emissions, noise and light pollution associated with this application will not give rise to deterioration of ancient woodland.

Drainage and SUDs

Ancient woodland ecosystems are sensitive to disturbance, and alterations to the surrounding hydrology can impact on soil moisture levels and the ecological condition of the woodland. Alterations to drainage patterns upstream of a woodland can cause changes to the hydrological regime for the woodland. Implementation of SUDs could change surface or ground water flows, in turn impacting the woodland.

The standing advice is clear that sustainable drainage schemes should only be approved if any changes to the water table do not negatively affect ancient woodland. The applicant needs to demonstrate that the strategy for drainage will not lead to deterioration of the ancient woodlands by altering the hydrological conditions in surrounding habitats.

Mitigation for Ancient Woodland

The standing advice states that larger buffer zones are more likely to be needed if development is **close to residential areas** or if a significant **increase in traffic** is anticipated. For large developments, we recommend buffer zones of **at least 50 metres** as a precautionary principle, unless it can be clearly demonstrated that smaller buffers would suffice.

Additionally, for a development of this size, part of the buffer should be treated as land that needs safeguarding rather than accessible open space. For example, if a 50 metre buffer is provided we would recommend **access is discouraged for a minimum of 15 metres** adjacent to ancient woodland.

Impact on Veteran Trees

Ancient and veteran trees are irreplaceable habitats and afforded a high level of protection in planning policy. They possess unique features which provide a rich and diverse range of habitats, playing host to countless other species. In particular, many rare invertebrate, fungi and lichen species are dependent on the decaying wood provided by such trees³. Veteran trees are disproportionately valuable parts of the natural environment and where they occur outside of woods they are also particularly important for landscape connectivity⁴. They are an essential part of our landscape and cultural heritage.

The arboricultural survey has identified 13 veteran oak trees and one veteran ash tree within the site. The veteran ash tree (T9) is also registered on the Ancient Tree Inventory as an ancient tree, ID 220955. Proposals with regards to the veteran trees on site are not clear, as discussed below.

³ <https://www.ancienttreeforum.org.uk/wp-content/uploads/2015/02/ancient-tree-guide-6-special-wildlife.pdf>

⁴ [Ancient and veteran trees. An assessment guide. \(woodlandtrust.org.uk\)](http://www.woodlandtrust.org.uk/ancient-and-veteran-trees-an-assessment-guide/)

Root protection areas vs buffer zones

There is a distinction between a veteran tree root protection area (RPA) and a veteran tree buffer zone which is not recognised in the application. The standing advice states: *“For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. **This will create a minimum 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.”*

Whereas the proposals apply a 15 times stem diameter RPA for veteran trees, it is not acknowledged that this is a minimum, and that larger buffer zones might be required.

This is likely to be the case for veteran and transitional veteran trees in areas where the development will concentrate activity, such as play areas, public open space, roads and footpaths, in the vicinity of the tree. Veteran trees typically feature significant deadwood habitat of great value for biodiversity, e.g. retained deadwood in the crown, broken or fractured branches, trunk cavities and wounds. As they age, the trees will inevitably shed limbs and branches, presenting a risk to their surroundings. This will result in a requirement to manage them more intensively, including pruning works and loss of habitat from sanitisation of such trees through removal of deadwood. Veteran trees are often sensitive to pruning works which can lead to their consequential decline or need for removal. Particular care will also be needed to manage impacts associated with soil compaction in the vicinity of the trees.

The design of the development should avoid bringing people into higher risk zones, which would increase the likelihood that tree works would be required into the future. Although the AIA states that veteran trees may be fenced-off with estate style fencing to deter access, such fencing is proposed around the RPA. There is no commitment to assess the need for larger buffer zones.

This is further supported by BS 5837 guidelines, which state: *“particular care is needed regarding the retention of large, mature, over-mature or veteran trees which become enclosed within the new development”* and that *“adequate space should be allowed for their long-term physical retention and future maintenance”*.

In the case of veteran ash tree T9, which would be situated within an area proposed for car parking, it is likely that the tree may need a larger buffer than the 15 times RPA. The applicant needs to assess impacts including air pollution from traffic emissions resulting in nitrogen deposition on the tree; increased risk of accidental damage to the tree from vehicles using the proposed car park; and changes in light levels leading to long-term decline of the tree and its biodiversity. The potential for changes to the surrounding hydrology resulting from the considerable increase in hardstanding in the vicinity of the tree in comparison to its existing situation also needs to be assessed.

Development within root protection areas

The Ecological Appraisal appears to indicate that construction may take place within buffer zones. It states: *“Where construction works within the veteran tree buffer zone is unavoidable (e.g. for construction of sympathetically designed attenuation ponds or path provision), these works should be subject of an agreed Arboricultural Method Statement and supervised by a suitably qualified arboriculturalist. In addition, works should be carried out in accordance with BS5837 ‘Trees in relation to Construction’ and avoid the rooting areas of the veteran tree.”*

We are particularly concerned about the suggestion that SUDs might be positioned within veteran tree RPAs. Veteran trees are sensitive to disturbance and it is important that the soil is not disturbed through construction activity. Construction within RPAs can lead to compaction of soils, reducing soil porosity, inhibiting root growth, and reducing water, oxygen and nutrient delivery capability. This is particularly important with soils with a significant clay content, as is likely to be the case here. Where SUDs are proposed within the RPAs of veteran trees there is the additional risk of hydrological impacts arising from the changes to surface or ground water flows in the vicinity of the tree.

The results of damage to veteran trees can take several years to become evident and as such construction work should not be undertaken within fully assessed and tailored veteran tree buffer zones.

We agree with the comments of the Council's Arboricultural Officer in this respect, that: *"Should the development proceed, all veteran tree buffer zones should be clearly defined and protected, for example through post-and-rail fencing around the edge of the buffers in order to restrict access and prevent soil compaction, in accordance with current guidance. All the veteran tree buffer zones **MUST NOT** be treated as amenity or recreational space and should be maintained in perpetuity."*

Planning Policy

The National Planning Policy Framework, paragraph 193 states: *"When determining planning applications, local planning authorities should apply the following principles:-*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists;"

Footnote 70 defines exceptional reasons as follows: *"For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."*

There is **no wholly exceptional reason** for the development in this location and as such this application does not comply with national planning policy.

Conclusion

The Trust **objects** to this planning application on the basis of deterioration of ancient woodland and veteran trees.

Protection for ancient woodland is outlined within National Planning Policy Framework (NPPF) at paragraph 193c. In its current form this application has significant potential for indirect impacts on ancient woodland and veteran trees that will contribute to their long-term deterioration, contravening national planning policy.

The application should be considered for refusal unless the applicant is able to provide clear and robust assessment to demonstrate that deterioration can be avoided.

Please contact us at planningcasework@woodlandtrust.org.uk to discuss any of the points raised in this letter.

Kind regards

C Johannesen
Programme Officer - Woods Under Threat

Natural England and Forestry Commission's standing advice:-

Ancient woodland, ancient trees and veteran trees: advice for making planning decisions

Direct and indirect effects of development:-

Development, including construction and operational activities can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby.

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:-

- *damaging or destroying all or part of them (including their soils, ground flora or fungi)*
- *damaging roots and understorey (all the vegetation under the taller trees)*
- *damaging or compacting soil*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*
- *damaging archaeological features or heritage assets*
- *changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss*

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*

Mitigation measures

Mitigation measures will depend on the type of development. They could include:-

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

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

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.

You should only approve sustainable drainage schemes if:-

- they do not affect root protection areas*
- any change to the water table does not negatively affect ancient woodland or ancient and veteran trees*