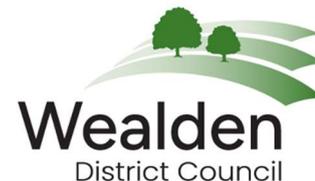


# Built & Natural Environment Team



This form is used to provide a consultation response. The form is completed by a member of the B&NE Team. All consultation responses are made publicly available.

<b>Application Reference:</b>	<b>WD/2025/0922/MEA</b>
<b>Site:</b>	<b>LAND WEST OF UCKFIELD - OWLSBURY FARM, HORSTED GREEN, LITTLE HORSTED, TN22 5T</b>

<b>From:</b>	David Massheder, Senior Arboricultural Officer, Planning & Environmental Services, Wealden District Council	<b>Date:</b>	27/10/2025
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<b>Summary</b>
<p>The proposal in its current form would result in a number of detrimental impacts that run contrary to NPPF guidance, local policy, standing advice and best practice guidance, the most significant of these impacts can be summarised as follows:</p> <ul style="list-style-type: none"> <li>• Encirclement, isolation and fracturing of Ancient Woodland irreplaceable habitat.</li> <li>• Inadequate buffering to Ancient Woodland irreplaceable habitat for the level of proposed development.</li> <li>• Unrealised opportunities for habitat restoration, enhancement of priority habitats and ecological networks.</li> <li>• Inappropriate positioning of development and SANG infrastructure in relation to irreplaceable and priority habitats.</li> <li>• Significant loss of habitats of principle importance (hedgerows).</li> </ul>

<b>Policy Considerations</b>
<p>WDC Local Plan Policies EN12, EN13 &amp; EN14.          NPPF (2024) Paragraphs 136, 187, 192 &amp; 193.          Natural England and Forestry Commission 'standing advice' for ancient woodland, ancient trees and veteran trees.</p>

## Assessment

### Introduction

The following comments are not exhaustive and focus on high level matters relevant to this site and the proposed development. WDC Arboricultural Officers are mindful that this application is outside of any development boundary and that it is proposed in undeveloped countryside, at the same time due regard is given to the parameters of Paragraph 11d of the NPPF relating to sustainable development. Comments have been prepared following an extensive site visit carried out on 13th October 2025 and after considering all relevant submitted information including, but not limited to the following:

- Concept Masterplan - D3313-FAB-00-XX-DR-L-1000
- Illustrative Masterplan - D3313-FAB-00-XX-DR-L-1001
- Illustrative Landscape Colour Masterplan - D3313-00-XX-DR-L-1000
- Green Infrastructure Parameter Plan - D3313-FAB-00-XX-M2-Y-057
- Arboricultural Impact Assessment & Method Statement Part 1
- Arboricultural Impact Assessment & Method Statement Part 2
- Outline Drainage Strategy Plan – P24041\_R2\_D02

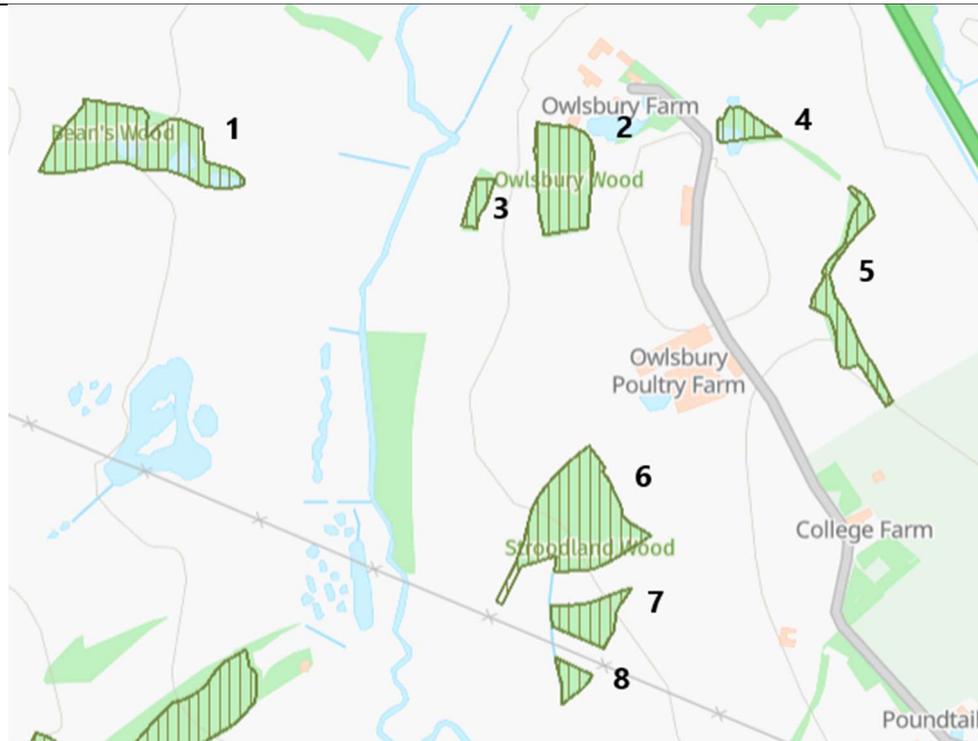
In addition, relevant local and national planning policy and the current joint standing advice from Natural England and the Forestry Commission in relation to ancient woodland and veteran trees have all been considered.

#### **1. TPO and Conservation Area constraints**

There are no TPO protected trees on the site, and it does not fall within a Conservation Area.

#### **2. Ancient Woodland and Veteran Trees**

The site hosts a well distributed number of ancient woodland (AW) parcels, identified by natural England mapping and regarded as irreplaceable habitat (Ancient Semi Natural Woodland). It is therefore essential that any site layout is fully informed by these constraints. The location and distribution of the AW parcels can be seen on the attached extract from Natural England's Magic Mapping database:



The woodland parcels are identified as Bean's Wood (1); Owlsbury Wood (2); Owlsbury Wood ext (3); Owlsbury Farm Shaw (4); Honeypot Shaw (5); Stroodland Wood (6); Stroodland Wood 2 (7) and Stroodland Wood 3 (8). It is noted that Owlsbury Wood lies outside of the development red line boundary and is not identified as AW on the Green Infrastructure Parameter Plan (D3313-FAB-00-XX-M2-Y-057). However, given its location on the boundary of the application site, it will still be influenced by the development, hence its inclusion in this consultation response.

Veteran trees (VT) are similarly regarded as irreplaceable habitat, and two individual specimens are identified on this site within the schedule of the Arboricultural Impact Assessment (AIA) as T59 (B cat Oak) and T235 (A cat Oak). During the course of the site visit officers identified a third tree, T75 (B cat Oak), that exhibited a number of veteran tree features and consequently this tree should be given the same level of protection as the two veterans identified in the schedule, i.e. the full VT buffer as described in the standing advice. In addition, trees T247d and T248 also exhibit retrenchment and other features consistent with trees in an early stage of veteranisation, these latter two are located within the wider AW buffer for Stroodland Wood.

Trees T59 and T75 are identified on the AIA and are given what appears to be the standard BS 5837:2012 root protection area (RPA) and an additional area highlighted in orange. It is presumed that this is a VT buffer in compliance with standing advice, although this is not explicitly stated on the plan key. The minimum 15m AW buffer is noted on the plan, as a solid blue line, around the AW parcels and is indicated on the plan key. The AIA does not extend to the SANGs area of the development site and so no technical arb information is currently available in regard to AW buffer provision at this location.

### Encirclement and pressure on AW

The illustrative layout and AIA suggest that development would entirely encircle Owlsbury Farm Shaw and Honeygot Shaw. Stroodland Wood, whilst currently divided into three individual parcels by narrow rides, should be regarded as a single woodland parcel given the proximity of its component parts to each other and it is noted that the AIA appears to concur with this view as its numbering convention refers to all three areas of Stroodland Wood singly as W247. This area of AW would be partially encircled by development with just the western/southwestern adjacent land free from development.

The proposals represent a considerable change to the landscape and would subject the AW parcels to significant pressure from the intensification of use of land adjacent to irreplaceable habitat that was hitherto undisturbed, aside from historic agricultural activity. Direct and indirect impacts as a result of development are described in detail in the standing advice <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort>

### Inadequate buffers for density for development

In line with standing advice, minimum 15m AW buffers are proposed to all AW parcels identified on the site and, with the apparent exception of offsite Owlsbury Wood. Given the intensity and density of proposed development on this site, the minimum buffer is considered insufficient.

Joint NE/FC standing advice notes that:

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:

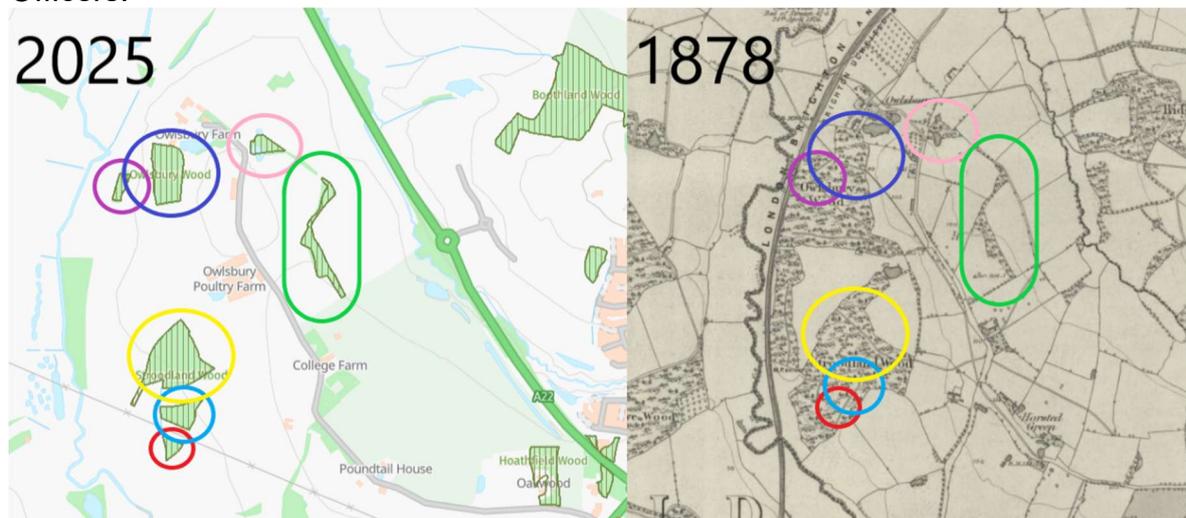
- less densely wooded
- close to residential areas
- steeply sloped

In this case, development is of a large scale; the surrounding area is undeveloped agricultural land comprising a number of individual fields enclosed by mature hedgerows; AW parcels are, in places, very narrow or of small size (e.g. Owlsbury Farm Shaw and Honeygot Shaw ); areas surrounding the AW parcels are not wooded at all and proposed development would bring an immediate urbanising effect in close proximity to the woodland. All of these factors combine to justify a larger buffer than the minimum 15m as described in the joint standing advice. It would be useful at this stage to reiterate that the existing site constraints, specifically in relation to the irreplaceable habitat, should inform the site design from the very outset.

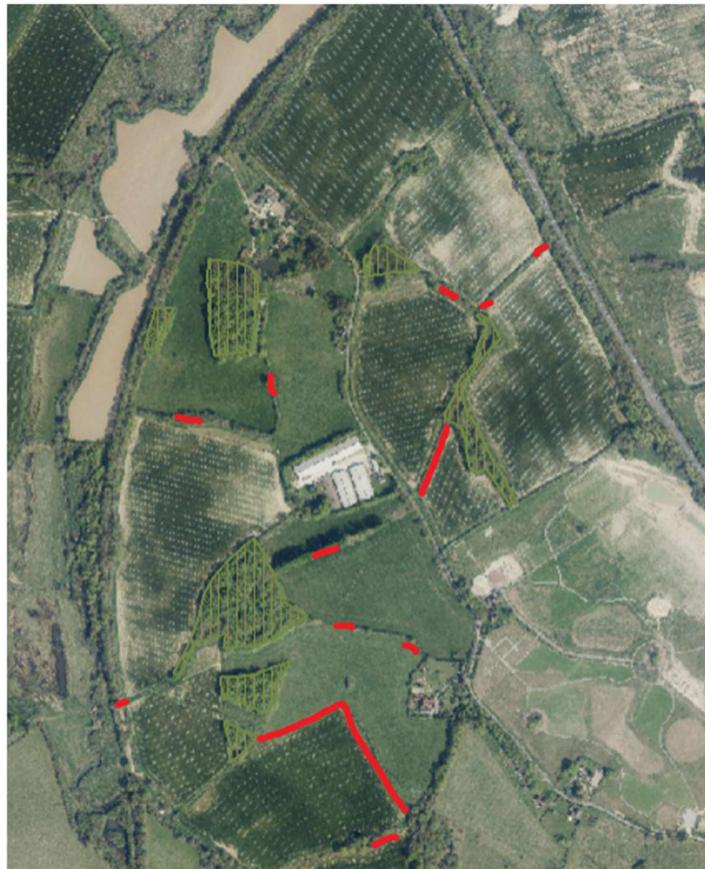
With this in mind, the structure and current physiological form of the AW habitat should also be taken into account when considering the proposed location of development. As one would expect, the site visit revealed that the AW parcels are made up of trees of varying form, age, girth, height, condition and varying degrees of optimisation. This is of particular relevance when referring to the woodland edge and its interface with proposed development. The trees/woodlands have been allowed to grow naturally and have developed forms and features that may not be considered to be optimised, when applying the principles of a standard tree survey. However, these features are integral component parts of the AW habitat and therefore should be allowed to remain unaffected and with no intervention necessary as a consequence of any development proposals. The woodland edge trees vary in height, and the AIA notes a range of approximately 13-20m, although trees within the woodland parcels may well be taller than this and will obviously continue to grow. These factors suggest an AW buffer starting point of 25m would be appropriate, to secure appropriate spatial separation from development in order to prevent against impacts from possible tree failure or future pressure that may arise from a heightened perception of risk. However, taking the wider site conditions into account and the heavily fractured nature of the AW parcels there is justification for further buffering to the edge of this initial 25m, which in effect would become a precautionary zone, and so the addition of a further 15m to make a total minimum AW buffer of 40m around all AW parcels is considered appropriate for this application. Given that this will reduce the developable space available on the site, a reconsideration of the scheme layout would be necessary.

#### Fracturing of existing connectivity on site

Historic mapping extracts (below) show that the AW parcels were once part of a larger network of woodland, but these have been significantly eroded since the late 19th Century, increasing fracturing impacts and isolation of habitat. The Council's Arboricultural Officers are only able to comment on the physical implications of the proposals in relation to woodland isolation and fracturing, not the wider ecological impacts, these matters and those pertaining to habitat and any ensuing loss of biodiversity that would arise, will be considered by the Council's Biodiversity Officers.



In line with Paragraph 192 of the NPPF, development should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. The submitted proposal does not appear to follow this direction (in relation to AW) and in fact would exacerbate existing fractures in connectivity across the site and it fails to take advantage of the opportunities available for real gains. Proposals should seek, in conjunction with the buffering described above, to reconnect existing AW parcels and to improve connectivity across the entire site. The map extract below illustrates approximate locations of proposed new breaks in connectivity across the site.



Owlsbury Farm Shaw and Honeypot Shaw would lose significant connectivity with the wider site with the loss of H224 and part of G195. The removal of both connecting ends of H99 would isolate Honeypot Shaw from the well vegetated eastern boundary of the site and the existing linear tree lines to the west, within the site at G98/G100. The linear connection between Stroodland Wood and the wider site, formed by H264 to the far western boundary tree line T261-T262, and the woodland along the former railway line G107 would similarly be severed. Further to the south Stroodland Wood would be completely disconnected from the southeast boundary tree line as a result of the proposals to remove significant lengths of hedgerow at H250 and H34. The current proposals will result in increased fracturing of AW parcels, loss of hedgerows and wider connectivity leading to isolation of habitat.

### Opportunities for AW enhancement/restoration of connectivity

In line with the NPPF, joint NE/FC standing advice for AW and British Standards in relation to trees and development, the existing site constraints should inform the design layout from the earliest stages. Existing gaps or currently used access points in hedgerows should be utilised before any additional new openings are proposed. Stroodland Wood has been historically bisected by an overhead power line, but opportunities to reconnect the individual woodland parcels are still available and planting can be carried out as long as minimum safety clearances/exclusion zones are observed. Low growing trees and understorey species could easily be utilised to reconnect this habitat as part of wider landscaping measures.

### Proposed new infrastructure adjacent to AW

Green Infrastructure Parameter Plan - D3313-FAB-00-XX-M2-Y-057 and Outline Drainage Strategy Plan – P24041\_R2\_D02 show indicative locations of various SUDs features, allotments, Local Areas for Play (LAPs) and Local Equipped Areas for Play (LEAPs) adjacent to AW parcels. In particular, the proposed SUDs feature between Owlsbury Wood and Owlsbury Wood ext, the three proposed SUDs features surrounding Stroodland Wood and the multiple LAPs and LEAPs which would be in close proximity to Owlsbury Wood, Owlsbury Wood ext, Honeypot Shaw, Owlsbury Farm Shaw and Stroodland Wood are unlikely to be compatible with the requirements of an enhanced AW buffer and these locations would need to be reassessed.

## **3. Tree Impacts as a result of development proposals**

### Tree loss

The AIA notes that up to thirty trees/groups/woodland groups will be lost as a result of development. Many of these are categorised as lower quality (C cat) using the *BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations* assessment criteria. It should be noted however that the use of the BS 5837 categorisation criteria in the case of woodland and in particular, AW and priority habitat deciduous woodland (PHDW), overlooks the wider habitat value and simply focuses on tree quality/optimisation. In this instance, the grading of AW, PHDW and hedgerows using the BS 5837 criteria is an imprecise science and should not be considered in isolation, for example Honeypot Shaw (W218) and Owlsbury Farm Shaw (W206) are categorised as B quality using this criteria, which suggests trees of moderate quality with an estimated remaining life expectancy of at least 20 years. This is unhelpful and rather contradictory given the woodlands value as irreplaceable habitat and the fact that it could remain in place for hundreds of years (as it has already done) if undisturbed and suitably protected.

The proposed southern access would require the removal of a section of W86 (C cat), an area of PHDW, and the northern access would require an additional area of woodland to be removed within G103 (C cat). The line of mature Poplar trees G249 (C cat) that runs east/west through the site and presumably planted

historically as a wind break, would be fractured with the loss of an unknown number of trees from within the group. The removal of the trees from within G249 is to enable the construction of the main site access road, this road also requires breaks at H250 and H23, all of these removals resulting in a cumulative effect of further fracturing of connectivity to Stroodland Wood. Overall and from a purely arboricultural perspective, proposals for individual tree removals are not considered to be insurmountable, however the impact to irreplaceable and priority woodland habitat as described above is and needs to be fully reconsidered.

#### RPA encroachment

To the far north of the site is a proposed link to offsite routes, this path skirts the edge of the neighbouring Gridserve site and emerges south of the Copwood Roundabout. The AIA shows that the route of the path would encroach directly into the RPAs of at least 14 higher quality trees (A and B cat). Mitigation in the form of a raised walkway is suggested, but it is not clear why this route has been selected as the preferred option, as it directly conflicts with paragraph 5.3.1 of BS 5837:2012, in that the default position should be that structures (including paths) are located outside the RPAs of trees to be retained unless there is an overriding justification. Whilst an above ground path may prevent root damage and compaction etc, the above ground impacts would remain, and it is likely that the trees lining a new pedestrian walkway would be then subjected to closer management to satisfy health and safety requirements, which would not have hitherto been the case. Where the trees overhang the path, there would be impacts from seasonal debris, shading, slippery surfaces and a heightened perception of risk which could lead to future pressure to heavily prune or fell trees. In line with current best practice guidance any linking pedestrian footway should be routed away from trees and at the very least outside of RPAs.

#### **4. SANG**

A proposed Suitable Alternative Natural Greenspace (SANG) is located to the west of the main site, and this is dominated by another parcel of AW, Bean's Wood, which is located at the very centre of the proposed SANG area. There are a number of proposals for the use of the land around the AW, including an educational hub to the east and a family play area to the north along with a network of new paths. It is noted that the existing PRoW is proposed to remain close to the western edge of the AW, rather than being diverted as is proposed to the footpath to the south of Owlsbury Farm. The cumulative effect of these proposals would be to encourage a significant increase in recreational use around the AW leading to detrimental impacts such as increased footfall within and around the AW, disturbance to wildlife, light and noise pollution and dog fouling. Current guidelines for the creation of Suitable Alternative Natural Greenspaces (SANG) state that *"The identification of SANG should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANG, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the development plan. These sites may require an ecological discount of their*

*proposed SANG area.*” The choice of the SANG location, which would lead to direct impacts to Beans Wood should be reconsidered given the large area taken up by the ancient woodland irreplaceable habitat and the likely deteriorating effects that would result.

## **5. Highway trees**

It is understood that some trees to be removed to form the site access points and the accompanying visibility splays are in the stewardship of ESCC Highways (see ESCC Highways consultation response dated 30/09/2025). It would be beneficial to all parties for the applicant to provide a separate survey and impact assessment for these trees which includes full justification and appropriate mitigation proposals. This will ensure that works to Highways trees are incorporated within the overall application, negating the requirement for ESCC to separately consult on Highway trees removal.

## **6. Hedgerows**

The proposal would result in the loss of a number of well-established and historic hedgerows forming field boundaries, most significant of these are H250, H34 and H224, these removals and the implications of loss of connectivity to AW are discussed in more detail above at paragraph 2. above but as habitats of principal importance, retention should be presumed and any development scheme designed to secure maximum retention. The ecological impacts of the proposed losses will be assessed in more detail by the Council’s Biodiversity Officers.

## **7. Street Trees**

At this stage comments in regard to street tree planting to satisfy the requirements of NPPF paragraph 136 are limited to observations of the illustrative landscape masterplan. This shows well defined street tree planting proposals along the primary routes through the site. This should be extended so that street tree planting is not just confined to major thoroughfares and that all parts of the development are provided with some meaningful street tree planting. It is essential that space is provided at design stage to allow for street trees to be located within verges or open green spaces and not within private gardens. This will allow for central control via a management company, residents association or similar body and to ensure that trees are retained and maintained for the duration of the development.

## **Recommendations**

### **Summary**

The proposal in its current form would result in a number of detrimental impacts that run contrary to NPPF guidance, local policy, standing advice and best practice guidance, the most significant of these impacts can be summarised as follows:

- Encirclement, isolation and fracturing of Ancient Woodland irreplaceable habitat.

- Inadequate buffering to Ancient Woodland irreplaceable habitat for the level of proposed development.
- Unrealised opportunities for habitat restoration, enhancement of priority habitats and ecological networks.
- Inappropriate positioning of development and SANG infrastructure in relation to irreplaceable and priority habitats.
- Significant loss of habitats of principle importance (hedgerows).

These impacts may be lessened or negated by a reconsideration of the scheme layout, in conjunction with a reduction of scale of development. Officers from the Arboriculture Section of the Built and Natural Environment Team would be pleased to provide further input to the Case Officer as the application evolves.