

Technical Note 04

Project: Land West of Turners Hill Road, Crawley Down

Planning Ref: DM/25/0014, DM/25/0015, DM/25/0016, DM/25/0017

Date: April 2025

Consideration of Planning Consultation Response from Forestry Commission (dated 6th March 2025)

1 Introduction

- 1.1.1 Aspect Ecology is advising Wates Developments in respect of ecological matters relating to Land West of Turners Hill Road, Crawley Down. Two sets of duplicate planning applications have been submitted at the site, relating to land to the south (application refs: DM/25/0014 and DM/25/0015) and north (DM/25/0016 and DM/25/0017) of Huntsland respectively.
- 1.1.2 A planning consultation response has been received from the Forestry Commission in relation to these applications (dated 6th March 2025), raising a concern that the applications would result in deterioration of multiple areas of ancient woodland adjacent to the sites.
- 1.1.3 Accordingly, this note provides consideration of the matters raised, setting out how ancient woodlands are safeguarded under the proposals.

2 Matters Raised by the Forestry Commission

- 2.1.1 The Forestry Commission response indicates that the proposals are likely to impact on ancient woodland as a result of the following:
- Recreational pressure arising from the new 350 dwellings, resulting in soil compaction, trampling of ground flora and natural regeneration, disturbance of fauna and impacts from noise, light and litter;
 - Habitat fragmentation and reduction of connectivity between the woodland blocks;
 - Other environmental changes including air pollution/run-off from increased road use and changes to hydrology; and
 - Deer impacts as deer currently using the site for grazing are displaced to neighbouring ancient woodland.
- 2.1.2 On this basis, the Forestry Commission recommends a number of measures to avoid deterioration including larger and higher quality woodland buffers and green infrastructure provision, improvements to ecological connectivity, restriction/management of access and contribution to woodland management.
- 2.1.3 However, the Forestry Commission response appears to be general in nature and does not engage with the specifics of the applications. Notably, the majority of issues raised are already considered as part of the ecology reports accompanying the applications yet there is no specific comment on the detail provided, or there is little evidence provided to justify the concerns raised. Further discussion of the individual matters raised is set out below.

2.2 Recreational Pressure

- 2.2.1 Discussion of ancient woodland is set out at paragraphs 4.7.4 onwards within the Ecological Appraisal reports for the southern and northern applications. As these detail, a minimum 15m buffer will be provided to the ancient woodlands, whilst the housing areas will be designed to face onto the buffers, providing visual surveillance and avoiding gardens backing onto habitat. This will be further reinforced with a hard edge to built development in the form of roads or footpaths. This approach is shown within the illustrative layout.
- 2.2.2 Additional planting (including thorny species) will be provided within the buffers to strengthen the woodland edge and discourage informal access, to be reinforced with fencing and signage. Footpath routes can also be provided within/adjacent to these buffers to direct users around, rather than through the woodlands. This accords with the Forestry Commission's recommendation to *"carefully restrict and manage access to woodland"*.
- 2.2.3 As shown on the illustrative layout, SUDS features will be created within or adjacent to woodland buffers along much of the ancient woodland edge (particularly W9 and W10 adjacent to the northern application), whilst an existing watercourse forms the boundary of W1 adjacent to the southern application, further discouraging direct access to the woodlands. Woodland W7 is located within open space, with large buffers to residential development.
- 2.2.4 The above approach follows Government guidance and based on previous case study experience, is effective at mitigating adverse effects resulting from residential development in close proximity to ancient woodland. It is anticipated that further details of such measures would be secured by planning condition requiring an ancient woodland buffer strategy and at the detailed stage through design of the housing areas.
- 2.2.5 Alternative greenspace provision can also serve to reduce recreational pressure. In this regard, the Forestry Commission response notes some greenspace provision under the proposals, but indicates given the development scale and time it would take for this to establish, it would not be sufficient to mitigate recreational impacts in full in its current form. The response goes on to advise that *"it would be proportionate to provide significantly improved green infrastructure that, once established, will provide an effective natural green space on-site for the community to use that benefits biodiversity (e.g. using a similar design approach to SANGs)." This appears to ignore the large-scale green infrastructure provision which has formed a key principle of the scheme design, with the central and western parts of the southern scheme and southern part of the northern scheme forming a large country park, measuring approximately 11ha in size. Although this will not be formally designated as such, the area has been designed in accordance with SANG principles (as detailed within the Shadow Habitats Regulations Assessment which accompanies the applications) and has been recognised by Natural England as supporting an established, semi-natural character suitable to form SANG. Indeed, beyond installation of physical infrastructure (e.g. footpaths and fencing), limited works are required to establish the area as suitable greenspace (contrary to the Forestry Commission comments). The country park significantly exceeds the 8ha per 1,000 population standard for SANGs set out under local policy (equating to 6.72ha) and therefore would readily accommodate recreational activity from new (and existing) housing, reducing pressure on the adjacent ancient woodlands. This directly accords with the recommendations of the Forestry Commission, yet the benefits of the proposal appear to be largely disregarded within the response.*

2.3 Habitat Fragmentation and Connectivity

- 2.3.1 As detailed within the ecology reports accompanying the planning application, there is minimal loss of wooded vegetation under the proposals, limited to minor breaks for road, pedestrian

and cycle accesses. The main area of clearance is within (non ancient) woodland W13, albeit the road access is adjacent to existing development along Turners Hill Road, such that the road will not significantly impact on connectivity between the network of wooded areas. A sensitive lighting strategy is also proposed to minimise impacts on nocturnal fauna such as bats. Accordingly, the proposals will not result in any significant fragmentation of existing woodland areas. Moreover, the large areas of greenspace and woodland buffers allow for strengthening of habitat connectivity through new planting and enhancement of existing habitat corridors.

2.4 Other Environmental Changes

2.4.1 The main access routes are located away from the ancient woodland areas, whilst buffers are maintained from residential roads such that negligible air quality impacts are anticipated. As detailed within the Ecological Appraisal reports, the drainage strategy will have specific regard to ancient woodlands, maintaining greenfield runoff rates and good water quality. Accordingly, no significant effects are anticipated as a result of other environmental changes.

2.5 Deer Impacts

2.5.1 As noted within the Forestry Commission response, deer impact is a landscape scale challenge, and there is limited ability for this to be addressed by individual applications. Surrounding woodlands are already being impacted by deer browsing, and potential displacement from the site is unlikely to be at a scale that would result in any significant additional impact.

2.6 Woodland Management

2.6.1 The Ecological Appraisals propose that existing woodland areas within the application boundaries are subject to long-term management to maintain and enhance their value for biodiversity. This includes ancient woodlands W2 and W7 located within the southern scheme, and accords within the Forestry Commission's recommendation to "*contribute to the management of woodland areas*". It is anticipated that this would be set out in a Landscape and Ecological Management Plan to be secured by condition and as part of the biodiversity net gain requirements.

3 Conclusion

3.1.1 This note provides a response to the planning consultation response received from the Forestry Commission in relation to applications at Land West of Turners Hill, Crawley Down (DM/25/0014, DM/25/0015, DM/25/0016 and DM/25/0017).

3.1.2 The Forestry Commission response indicates that the proposals would result in deterioration of ancient woodland, although there is little evidence provided to justify the concerns raised, whilst the response does not engage with the specifics of the applications. Indeed, there appears to be little recognition of the proposed design of housing areas and woodland buffers and substantial greenspace provision which would reduce impacts from residential development, whilst potential impacts of habitat fragmentation and environmental changes are overstated.

3.1.3 Appropriate treatment of the ancient woodlands to avoid deterioration has formed a key principle of the scheme design, and the applications are considered to accord with paragraph 193(c) of the NPPF. This is supported by other consultation responses, notably Place Services providing advice to Mid Sussex District Council on ecological matters, which raises no concerns on ancient woodland and states "*we support the implementation of a 15m buffer zone between the development and ancient woodlands [...] in accordance with Government Standing Advice,*

and the planting of thorny species, including Hawthorn, Blackthorn and Holly, together with fencing and signage, to discourage access to the ancient woodland” (consultation responses dated 24th March 2025).