

# Consultation Review

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PROJECT: Land South of Green Road, Wivelsfield Green (LW/24/0820)

## TN01: Arboricultural Consultee Response

18<sup>th</sup> June 2025

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### Introduction

- 1.1. Aspect Arboriculture are instructed by Taylor Wimpey Strategic Land, to provide arboricultural input relating to the introduction of proposed residential development to Land South of Green Road, Wivelsfield Green (app. ref: LW/24/0820).
- 1.2. Following submission of the application, consultation comments were received from the Lewes District Council's Arboricultural Officer dated 2<sup>nd</sup> May 2025, within which they raise an objection on the grounds of deterioration of Ancient Woodland.
- 1.3. This note has been produced in direct response to the officer's comments, providing additional commentary regarding the highlighted tree cover. In terms of structure, I separate the officer's objection points regarding Ancient Woodland and observations relating to design considerations as per their comments.

### Impact on Ancient Woodland

- 2.1. The officer suggests that the proposed development fails to provide sufficient buffers to the adjacent parcel of Ancient Woodland, which could lead to deterioration of aforementioned parcel.
- 2.2. The officer states that the proposals and AIA adhere to the NPPF, but do not consider Natural England and Forestry Commission standing advice with regards Ancient Woodland and Veteran Trees.
- 2.3. I categorically dispute this assertion; the NE/FC Standing Advice has been considered from the outset; the minimum recommended buffer distance is 15m from the boundary of the woodland to prevent root damage. Instead of providing the minimum buffer zone, as illustrated within Figure 1 overleaf, the development provides the woodland with in excess of 42m separation at its closest extent; representing a 280% increase over the minimum recommendations.
- 2.4. Importantly, within their own consultation response to the application, Natural England themselves raise no objection to the scheme. Mentioning the presence of Ancient Woodland within their response, it is reasonable to infer that the buffers provided are considered appropriate to adequately protect this irreplaceable asset.

- 2.5. The officer proceeds to cite that the Woodland Trust advises that a precautionary buffer of at least 50m should be provided. There is no justification or evidence provided however as to why this specific distance has been decided upon as an acceptable threshold, or why it would be effective, simply stating the proposed buffer ‘*appears inadequate*’.
- 2.6. I am of the firm opinion that the buffers provided within the development are sufficient, and in any event are not dissimilar to the extent requested by the officer. With regards the quantum of housing proposed, it is important to remain cognisant of an Inspector’s decision in West Berkshire (Appeal ref: APP/W0340/W/20/3265460). Importantly with regards this far larger development, the findings of both the Inspector and the Secretary of State confirmed that, given a 15m buffer “*the proposal would be unlikely to result in the loss or deterioration of ancient woodland and would comply with paragraph 180 c) of the Framework*”. Given the lesser scale of development in this instance, it therefore follows that a similar buffer distance would be adequate; nevertheless nearly three times the distance is proposed within the scheme.

Figure 1: Ancient Woodland Buffer Zone

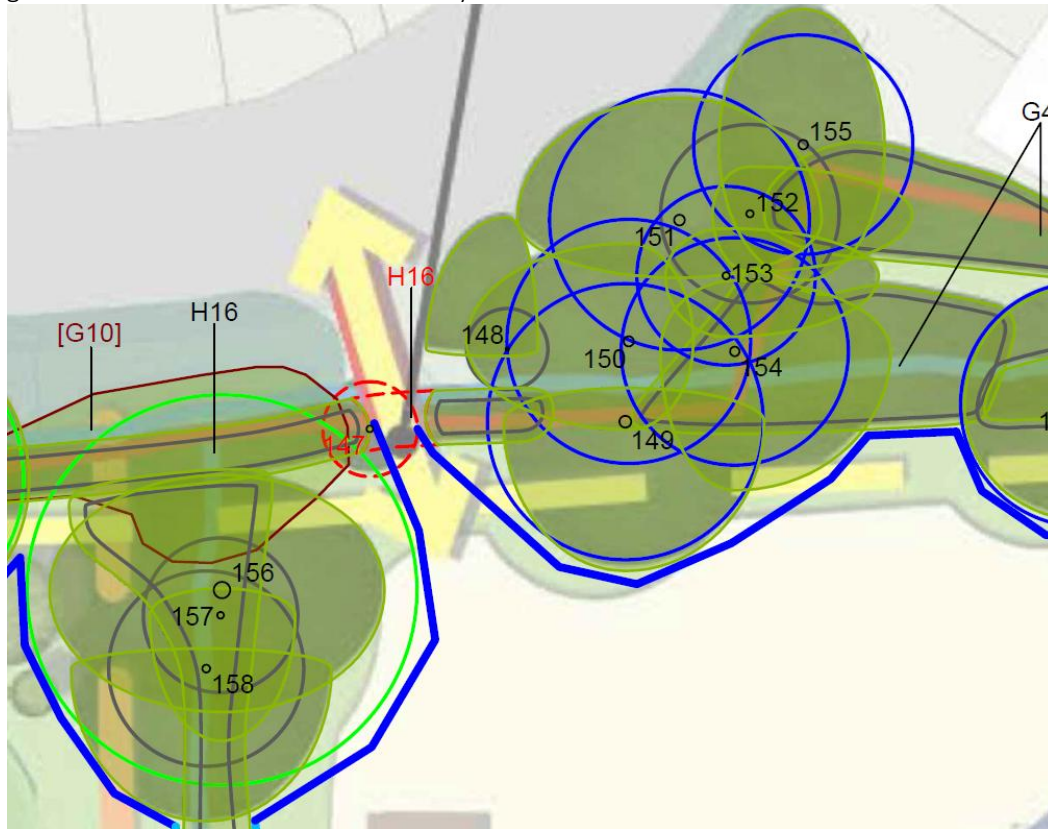


### Design Considerations

- 3.1. Although not raising a further objection, the officer continues to identify two queries with regards design of the site:
- 3.2. **(a)** The officer’s first query highlights that the pedestrian access with Eastern Road incurs the removal of trees, querying whether this could be designed to preclude this requirement.
- 3.3. To provide clarity on this point, the access has been deliberately sited to preclude detrimental effects on significant English Oak trees adjacent to the existing field access. As illustrated within Figure 2 overleaf, whilst the access will incur the removal of a section of low quality scrub and hedge alongside a declining Cherry (T147), it completely avoids the Root Protection Areas of category B T149-T151 and category A T156. The tree removal can be compensated for, and justified through the avoidance of more significant tree cover.

- 3.4. Turning to the width of the proposed access, this has been designed in accordance with the advice received from East Sussex County Council Highways department.

Figure 2: Eastern Road Pedestrian and Cycle access



- 3.5. **(b)** Within the second query, the officer identifies that care has been taken during the iterative design process to minimise loss of vegetation within the scheme but asks whether the quantum of breaks within the hedgerow network is necessary.
- 3.6. The iterative process for the scheme has been extensive, and I am delighted that the effectiveness has been noted by the officer. With regards to the quantum of hedgerow loss, this is unavoidable to deliver the aspirations for the development. In addition to providing access and interconnectivity between the disparate development parcels, a key objective has been to secure a coherent area of public open space that can be experienced for what it is; a single extensive expanse that wraps around the proposed development, as opposed to individual sectors associated with individual parcels. To deliver this, pedestrian connectivity between the southern extent of the fields is required, and the hedgerow removals are directly driven by this objective.

## Conclusions

- 4.1. The officer's claims seeking the protection of the Ancient Woodland are well-intended but fail to consider the extent of buffer proposed within the scheme. It is my firm opinion that the buffers provided (at almost three times the minimum recommendations), are sufficient to adequately protect the important asset, correspondingly, Natural England have no objection to the proposals. To those grounds, it is demonstrated that the Ancient Woodland buffers, as applied, are consistent with Forestry Commission/Natural England standing advice.

- 4.2. The officer's latter queries, whilst not forming an objection, identify features of the development that do incur tree and hedgerow loss. As demonstrated above, both of these are deliberate, and well-intended. That is to secure both the confident protection of the site's most important tree cover, and to provide the greatest opportunity to enjoy the extension open space provision as designed.

Prepared by:

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