

APPENDIX 2

Application Number DC/14/1667/FUL
Address Land South Of Rougham Hill, Rougham Hill

Proposal Change of use of woodland to Gypsy/Traveller site consisting of five pitches

Comments

Layout and impact on trees

The site comprises plantation broadleaf woodland estimated to be 40 years old; and hedgerows and mature trees on the north eastern boundary which significantly pre-date this. The ecological report highlights that the plantation trees are densely planted and as such there is little understorey planting. The most mature and significant trees are located on the north east boundary of the site and this is reflected in the arboricultural assessment which identifies these trees as category 'A' trees. In addition the southern and northern boundaries which are not planted (with oaks) have developed into diverse scrub. The woodland is considered to be of moderate ecological value and of moderate landscape value providing separation between the Public Right of Way (PRoW) and the lorry park which it screens from the north and west.

The proposals will require the removal of a number of trees; essentially the plantation oak in the central part of the site. The proposed access road and the dayroom /utility buildings are located along the south western side of the site and this will minimise impact caused by excavation of foundations on the mature trees. However the proposals require the introduction of significant areas of hard standing for caravan pads and for car parking and leisure. These areas have the potential to impact on trees. The arboricultural report and email of 13 January 2015 make recommendations for design and construction methods to ensure that harm to trees including the mature trees is minimised. Given the lack of detail (the location of the mature trees has not been identified); if consent is to be given, these measures will need to be conditioned as follows:

- The position, species and root protection area (RPA) of all the mature trees particularly to be marked on a plan
- Details of no-dig pads for mobile homes and caravans to be submitted
- Details for dayrooms/utility foundations where they are within RPAs
- Details of no-dig construction for permeable hard standing required for car parking and leisure functions.

Irrespective of these measures there will be a loss of trees (and woodland) resulting from these proposals. The proposals as submitted do not include compensation for this loss. This is an item that has been highlighted by Suffolk Wildlife Trust in their letter of 6 October 2014.

Given that there is little room within the application site to provide replacement canopy cover; possible mitigation could be the management for nature conservation of the defunct hedgerows and mature trees retained adjacent to the PRoW. This would have the additional benefit of maintaining the amenity of the route. A management plan would be required which could be submitted by the landowner as part a condition or other obligation.

Comments relating to the FC consultation response

The Forestry Commission consultation response highlights Government policies which seek to retain and protect woodland and forest. This change of use application does appear to be in

conflict with The UK Forestry Standard and this factor would need to be considered against the other benefits of the proposals.

There is no indication/records to suggest that this small area of woodland is 'ancient' woodland or that there are veteran trees present although one mature oak has been identified to have a diameter at breast height (dbh) of 1100mm (veteran trees can have a dbh of 1000mm). This oak is recorded in the arb report to be in good condition; however elsewhere in the ecology report it is recorded that there is some deadwood which is one of the features of veteran trees and other cracks and crevices. Whilst the NPPF para 118 seeks to protect irreplaceable habitats, the woodland to be lost here is not irreplaceable, and the mature trees including the oak are to be retained.

The FC confirms that the Forestry EIA regulations do not apply.

The FC consultation response is correct in its observation that management of the woodland would lead to improvements in the biodiversity and that the woodland could be retained and managed as a commercial proposition with the value of the trees and the biodiversity of the woodland increasing with time. The trees would need to be managed to achieve this

The FC has also confirmed that if planning consent is given a Forestry Commission felling licence would not be required.

Impact on landscape and visual amenity

The woodland is known to have been planted in 1974 as a community woodland project, however the woodland appears to have never been managed and the area is known to have a reputation for antisocial behaviour. The existing new sign at the site was part of a clean up undertaken recently to improve the sites amenity. Other than the use of the PRoW which is observed to be well used there is no evidence that the community actively use this space excepting a cycle trail formed of artificially created mounds and dips between the tree lines.

The proposal will result in partial loss of the woodland. The proposals are to remove the plantation oak trees in the central section leaving the boundary trees which will minimise the harmful impact.

The boundary to the southwest of the site borders the lorry park. Should the proposals be implemented this boundary should be improved to provide an effective visual screen. This could be achieved by maintenance of the existing row of trees (potential removal of some trees and replacement with other shrubs). **Details will need to be conditioned.**

Impact on amenity of the PRoW

There is a PRoW which follows the north east boundary of the woodland. The path connects Rougham hill with Rushbrook Lane and onto Rushbrook and Sicklesmere beyond. There are hedges (described as defunct because they are not intact) on both sides of the path with mature trees. These features give the well worn path an attractive 'green lane' character.

The proposal is to retain all the mature trees and other vegetation adjacent to this path to ensure that the route's character is retained. This principal is promoted in the submission however it is not fully demonstrated because the exact location of the most significant trees has not been identified. **If consent is given, information on the position of all 'A' category trees and their retention and protection should be conditioned**

Whilst the proposal to place a closed board fence between the PRow and the footpath will screen the pitches from footpath users which will be beneficial, the presence of the fence will also be harmful to the character of the path – closed board fences are more generally associated with garden boundaries than with woodland. These factors need to be considered in the balance along with the other benefits such a fence would provide.

Relationship to South East BSE growth area

Details have not yet been finalised in relationship to this site. In relation to the adopted concept plan the proposed site falls within an area proposed for residential use with a strategic green edge. The first draft of the masterplan which is currently being developed shows the woodland area retained and integrated into green corridors which link to boundary green space and to the PRow route. Retention of the mature trees adjacent to the PRow (which forms part of the current proposals) is necessary to ensure continuity of the green corridors which could be supplemented to provide a setting/buffer for the gypsy traveller site.

Impact on nature conservation

The proposals are supported by an ecological study (Wild frontier Ecology 2014)

No impacts on designated nature conservation sites are predicted.

The proposals will lead to the loss of some woodland and a small amount of scrubland habitat from the northern boundary. The plantation woodland to be lost is considered to be replaceable (by the ecologist).

The ecological report identifies a number of mature trees on the site that could potentially be used by bats for roosting. The current proposals include for the retention of these trees and this forms part of the mitigation measures to ensure no impact on bats. A further assessment of trees for bat potential will need to be submitted alongside details relating to the retention/removal of trees (all trees to be removed will need to be assessed) to ensure there is no impact on bats. **This should be conditioned.**

The ecological report includes a section on mitigation proposals. These measures will need to be implemented in full and should **be conditioned**. In addition **a separate lighting condition should be attached (BS42020:2013).**

The close board fence should be adapted to ensure there is connectivity between the two parts of the woodland **(condition).**

JMF
20.01.15