



**Horsham
District
Council**

Representation Form

Ashington Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Ashington Neighbourhood Development Plan

In light of recent announcements regarding COVID-19 Horsham District Council has reviewed its protocols regarding the consultation process for neighbourhood plans, a number of which were published for public consultation shortly before the government imposed the nationwide lockdown.

In order to continue to progress neighbourhood plans, we have made a decision to restart with the consultation process with measures we feel are in accordance to the government guidelines.

Ashington Parish Council has prepared a Neighbourhood Development Plan (ANP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally. In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the ANP and associated documents will go out to consultation:

Wednesday 17 June to Wednesday 12 August 2020 for 8 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement and the full Strategic Environmental Assessment (SEA).

Copies of the ANP Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

Documents will not be made available in deposit locations due to the current COVID-19 pandemic. If local residents have difficulty in engaging online we have provided a telephone number and email address below. Members of the public are encouraged to leave their details for an officer to contact them back if they need further information.

Email: neighbourhood.planning@horsham.gov.uk – SAS@southdowns.gov.uk

Telephone: 01403 215398

All comments must be received by Midnight on Wednesday 12 August 2020

There are a number of ways to make your comments:

1. Please use the above web address above to make your representation online ; or
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by

Horsham District Council in line the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	██████████
Address	Woodland Trust, Kempton Way, GRANTHAM Lincs
Postcode	NG31 6LL
Telephone	██████████
Email	██
Organisation (if applicable)	Woodland Trust
Position (if applicable)	Regional External Affairs Officer
Date	12 August 2020

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support

Support with Modifications

Object

Comment

Please give details of your reasons for support/opposition, or make other comments here:

The Woodland Trust is the UK's leading woodland conservation charity, and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees. We own over 1,275 sites across the UK covering over 23,580 hectares and have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

Our comments below complement the more detailed response already made on the Draft Horsham District Local Plan 2019-2036.

Ashington is a location of particular interest to the Woodland Trust as it lies within the area of the Trust's Lost Woods of the Low Weald and Downs project, which works to restore and reconnect ancient woodland.

POLICY ASH2: INCREASING WALKING IN ASHINGTON

We welcome the policy in para E "Sustainable development which creates or facilitates new linkages between PROWs and bridleways, including across the A24, will be supported" noting that this focuses on enhancing crossings over the A24 for walking and equestrian use. We would further urge support for providing safe crossings for wildlife, for example with tunnels or green bridges which would also enhance the quality of the local landscape.

POLICY ASH5: LANDSCAPING AND COUNTRYSIDE ACCESS

We are disappointed that the plan is silent on the subject of ancient woodland. There is a small but important amount of ancient woodland, including America Wood which could be buffered and better connected. Increasing the connectivity between and America Wood and Baldwins Wood (just over the parish boundary in Wiston) would greatly benefit landscape resilience.

We note policy 5 A which states "*Development which abuts open countryside must not create a hard edge and should provide an appropriate landscape buffer.*"

We recommend making explicit reference to ancient woodland and setting a recommended buffer distance. Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

We support policy 5 B which encourages "*the retention and planting of trees, hedges and vegetation is encouraged to soften the impact to development, retain and improve the street scene, keep the rural village feel of Ashington and, where possible, enhance the setting of the South Downs National Park.*"

We suggest strengthening it to include support for new planting to support the restoration of historic hedges and tree lines, to benefit landscape resilience.

POLICY ASH10: CHANCTONBURY NURSERY

We note the reference to the following principle

“x. enhance the setting of the South Downs National Park, including through the provision or enhancement of an appropriate landscape buffer in line with the requirements of Policy ASH5 (Landscaping and Countryside Access)”.

We suggest including a specific reference to retaining mature trees on the site, and strengthening the wording with a specific target for tree canopy cover as part of this site policy, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

POLICY ASH11: LAND WEST OF ASHINGTON SCHOOL

We support xi. retention of Forest School activities on the western part of the site, along with safe footpath access, for use by the school, from Ashington Primary School to this area and to the Forest School activity area to the south-west of the site.

We welcome the reference to the following principles

xxii. mature trees are retained on the site;

xxiii. enhance the setting of the South Downs National Park, including through the provision of an appropriate landscape buffer in line with the requirements of Policy ASH5 (Landscaping and Countryside Access);

We suggest strengthening it with a specific target for tree canopy cover as part of this site policy, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.

Significant increases in tree canopy cover have been identified by the UK Committee on Climate Change as a vital part of the climate emergency response and will require all major public bodies to play their part in identifying sites and supporting conservation of existing mature trees as well as new tree planting. The Woodland Trust supports an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country’s biodiversity and climate crises. As part of that, the Trust recommends a target of ensuring all development land includes a minimum 30% tree canopy cover. We strongly urge setting a target for the Ashington sites, even if lower than the Trust’s recommended 30%.

What improvements or modifications would you suggest?

POLICY ASH2: INCREASING WALKING IN ASHINGTON

We recommend the following change to para E “Sustainable development which creates or facilitates new linkages between PROWs and bridleways, and green corridors for wildlife, including across the A24, will be supported.”

POLICY ASH5: LANDSCAPING AND COUNTRYSIDE ACCESS

We recommend the following changes:

Add new wording to para A *“Development which abuts open countryside or ancient woodland must not create a hard edge and should provide an appropriate landscape buffer.”*

Add new para E

The restoration of natural habitats, including ancient woodland, to improve connectivity with the surrounding landscape is to be encouraged. In particular, opportunities to reconnect the landscape with green links, for example across the A24 and around important sites such as America Wood, will be encouraged.

Reason: The consequent increase in ecological connectivity between areas of ancient woodland will help create the resilient landscapes recommended in Making Space for Nature (Defra 2010).

And/or

Add wording to para B *“the retention and planting of trees, hedges and vegetation is encouraged to soften the impact to development, retain and improve the street scene, keep the rural village feel of Ashington, reconnect natural habitats, and, where possible, enhance the setting of the South Downs National Park.”*

POLICY ASH10: CHANCTONBURY NURSERY

We suggest adding new wording

x. mature trees are retained on the site, a requirement to replace any trees that are removed, and encouragement of new planting, to increase the overall tree canopy cover on site to a minimum of 30 per cent,
and renumbering.

POLICY ASH11: LAND WEST OF ASHINGTON SCHOOL

We suggest strengthening the wording

xxii. mature trees are retained on the site, a requirement to replace any trees that are removed, and encouragement of new planting, to increase the overall tree canopy cover on site to a minimum of 30 per cent.

We strongly urge setting a tree canopy cover target for the Ashington sites, even if lower than the Trust's recommended 30%.

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 19 of the Neighbourhood Plan (General) Regulations 2012 in relation to the Ashington Neighbourhood Development plan?

Please tick here if you wish to be to be notified: