

WSCC COUNTY ARBORICULTURAL OFFICER response to planning consultation

Application reference number: WSCC/052/20

Location: Land to the north of Eastergate and north-west of Barnham, PO22 0DF

Proposal: The construction of a 1.3km single carriageway with a 3m wide shared cycleway/footway, 2.5m wide central island, one uncontrolled pedestrian crossing with a central island to enable users of the PRow to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and associated works

District: Arun

Date: 9th December 2020

Summary response: further information required

Response:

Arboricultural report

This has been prepared on the basis of some assumptions and limitations. Concern remains over unknowns such as contractors' spatial working requirements and enabling works, which could have significant adverse impacts on retained trees and reduce the available area for landscape works.

Similarly, *'the AMS will be reviewed by the design team during the detailed design phase'* (3.7.2). It must not result in additional removals or impacts on retained trees.

Arboricultural monitoring and site supervision is essential throughout the construction as is a pre-commencement meeting.

Green infrastructure strategy / BNG

This makes reference to biodiversity net gain as a specific design opportunity (pages 12 and 25): *'the proposed scheme should achieve a BNG.'* *'The design proposals for the proposed scheme should be revisited, if necessary, until a BNG is achieved.'*

Outline EMP (CEMP part 3) paragraph 3.2.8: *'In line with local and national policy, the Scheme aims to achieve at least a 10% gain in biodiversity post-development, as supported by a BNG assessment (WSP 2020e). The final figures and results of the assessment are detailed in the BNG report, however it is understood that a net gain of at least 10% has been reached.'*

In direct conflict with this last statement is that from the BNG final assessment (appendix 9.10): *'The proposed development does not achieve a scheme-wide biodiversity net gain.'* Considerable effort was made to provide the metric for this and to demonstrate that the authority is serious about providing BNG even before it becomes a statutory requirement. The proposed scheme will have a very significant adverse impact and requires a comprehensive package of mitigation and compensation measures to make it acceptable. Surely there must be scope to plant an additional 50m of hedge which would achieve BNG?

It is essential that all the elements required to achieve BNG are maintained in the long-term, i.e. creating a net gain legacy. This is not achieved (point 8 of table 3.5 BNG final assessment). The LMMP (appendix 10.4) is for a period of 5 years only which is a default minimum.

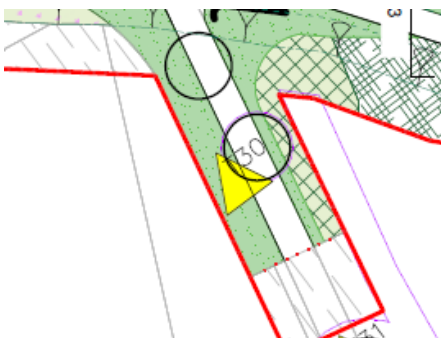
Planting schedule / Landscape strategy

1. Full, detailed landscape specification is required with full reference to all relevant British Standards. Extracts of typical planting layout matrices must be included.
2. All plant material and seed must be UK sourced and grown and comply with all current biosecurity regulations.
3. Whips, not wips
4. With the exception of the specimen trees, all planting stock should be transplants.
5. There is no oak (*Quercus robur*) included in the planting mixes – it should be a component of SW1. Replace silver birch or elder with oak or reduce percentages of other species.
6. Specimen trees – omit copper beech, horse chestnut and cherry plum; use oak, field maple and alder (*Alnus glutinosa*) instead. There could be problems with aspen suckering so use white willow (*Salix alba*) instead. There are 10 species listed and there are to be 16 trees – in what proportion?
7. Apple trees – there are numerous commercially available Sussex varieties which I have previously advised on in some detail. At least use Cox's Orange Pippin instead of Golden Delicious. My understanding was that some orchard planting was proposed (at least 6 trees) to compensate for the loss of the traditional orchard, so it should use traditional varieties on a semi-vigorous or vigorous rootstock.
8. Hedge mix – ensure *field* maple is specified for the avoidance of doubt. The planting rate should be a minimum of 3 plants per linear metre.

Other points

- 'Areas to retain maximum feasible amount of vegetation' – who decides? The extent of clearance required may be harmful to retained trees.
- It is noted that the design is not yet complete and requires more detail. There is scope for tree planting on some of the roundabouts.
- CEMP part 2 – general arrangement drawings: planting is mentioned for swales – 'low growth perennial species not exceeding 1.5m in height, preferably evergreen' – what exactly is proposed here?
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From dwg A29-WSP-LA-GA-002 rev G:



The drawing shows a hard surface path apparently through the middle of a TPO tree – is this correct? Will detailed bespoke method statements be forthcoming with regard to working and construction in close proximity to trees?

LMMP (appendix 10.4)

- 5.1.1 the arboricultural report is now version 2.
- 5.1.2 BS3998 is now the 2010 version, not 1989.
- 5.1.8 ivy is not a concern in most situations
- 7.1.10 wound sealant should never be used

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