SHOREHAM HARBOUR REGENERATION COMMENTS

Application Number	AWDM/0109/17
Location	99 Gardner Road, Southwick, BN41 1PN
Proposal	Vehicular crossover and dropped kerb for parking in front garden (including the removal of tree on grass verge)
DM Officer	Hannah Barker
SHR Officer	Chris Jones
Date	08/03/2017

Relevant policies

National Planning Policy Framework: Paragraphs 109, 118
Planning Practice Guidance: Paragraphs: 8-027, 8-028, 8-032
Adur District Local Plan 1996: Policy AN4
Submission Adur Local Plan 2016: Policies 15, 31, 32
Draft Shoreham Harbour Joint Area Action Plan 2016: Policies SH7

Summary

Shoreham Harbour Regeneration Partnership objects to this proposal. The proposed dropped kerb would require the removal of a healthy, mature tree. This is contrary to a number of national and local policies. If the Council is minded to approve the proposal this should be conditional on the provision of replacement tree planting that will ensure a net gain to biodiversity in the long term.

Key Issues

Paragraph 109 of the **National Planning Policy Framework** states that the planning system should contribute to and enhance the natural and local environment by:

- recognising the wider benefits of ecosystem services
- minimising the impacts on biodiversity and providing net gains to biodiversity where possible.

The Forestry Commission has produced research which demonstrates that street trees provide a range of ecosystem services. These include:

- carbon sequestration
- temperature regulation
- air purification
- natural and landscape connections

Whilst the loss of an individual street tree may seem insignificant, this tree is part of a network of trees and other green infrastructure. The loss of an individual tree increases the risk of fragmentation of the green infrastructure network and reducing its ability to provide those services.

Green infrastructure is the network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Paragraph 8-027 of the **Planning Practice Guidance**, includes street trees in this definition. Paragraph 0-28 states that Green infrastructure provides multiple benefits at a range of scales, for the individual, for society, for the economy and the environment. It states that green infrastructure should be a key consideration in planning decisions.

Policy 15: Quality of the Built Environment and Public Realm of the **Submission Adur Local Plan 2016** states that development should respect the existing natural features of the site, including trees, and contribute positively to biodiversity.

Policy 31: Green Infrastructure of the **Submission Adur Local Plan 2016** states that green infrastructure will be protected and enhanced and the ecological characteristics of the area will be taken into account in order to maximise biodiversity benefits.

Policy SH7: Natural environment, biodiversity and green infrastructure of the **Draft Shoreham Harbour Joint Area Action Plan 2016** states that there should be no net loss of biodiversity, and that all development must seek to provide a net gain to biodiversity.

The removal of the healthy, mature tree as part of the proposed redevelopment would clearly be inconsistent with these national and local policies. However there is no proposal for mitigation of compensation of the loss of biodiversity, green infrastructure or ecosystem services. The proposal should therefore be refused.

If the Council is minded to approve the proposal, this should be conditional on the provision of replacement street trees. There is provision for such a condition in both national and local policy:

Paragraph 118 of the **National Planning Policy Framework** allows for the provision of compensatory measures. Paragraph 8-032 of the **Planning Practice Guidance** allows for planning obligations and conditions to secure this.

Policy AN4 of the **Adur District Local Plan 1996** states that the Council will seek to secure benefits to nature by imposing conditions on planning permissions where appropriate. Policy 32: Biodiversity of the **Submission Adur Local Plan 2016** states that the Council will use planning conditions or obligations to provide appropriate compensatory measures.

Recommendation

Shoreham Harbour Regeneration Partnership recommends that this application is refused as it is contrary to national and local policies above. The applicant has not demonstrated that the benefits of this development outweigh the loss of biodiversity, green infrastructure and ecosystem services. If approval is granted, this should be with the following condition:
"To compensate the loss of the healthy, mature tree, the applicant is required to provide specimen (semi mature) trees as replacement and arrange for these to be planted by a suitably qualified person. These shall be replaced as soon as is reasonably practicable and, in any case, by not later than the end of the first available planting season, with trees of such size, species and in such number and positions as may be agreed with the Council and landowner."