Horsham District Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land East of 1 To 25 Hayes Lane Slinfold
DESCRIPTION:	Outline application with all matters to be reserved except for access and layout, for the erection of 38no. dwellings, (including 13no. on-site affordable housing units), together with access from Hayes Lane, vehicle and cycle parking, landscaping, open space and play provision, sustainable drainage, and re-alignment of Public Right of Way No.3782
REFERENCE:	DC/25/2006
RECOMMENDATION:	**Advice / modification** to roadside TPO'ed trees RPA's and modification to new western road alignment is needed to address its location in the RPA of trees T60, T61 and likely T62; **Holding objection** is currently raised to the scheme on the above grounds

SUMMARY OF COMMENTS & RECOMMENDATION:

The submitted Arboricultural Impact Assessment (AIA) is broadly compliant with BS 5837:2012 and generally provides sufficient information to assess the arboricultural constraints of the site. A total of 64 individual trees, along with groups, hedgerows, and scrub, were recorded. The categorisation of trees broadly reflects their observed condition and contribution, with higher-quality Category A and B trees forming part of the peripheral landscape structure.

The proposed development seeks to retain most of the existing tree cover on the site, and any losses can be appropriately compensated for elsewhere within the site.

However, concerns are raised regarding the way the Root Protection Areas (RPAs) for the Hays Lane roadside TPO'ed Oaks have been plotted, as well as the proposed development within the RPAs of protected trees of very high landscape and amenity value. Given the greenfield nature of the site, where layout flexibility is inherently greater, the threshold for any development within the RPAs of retained, TPO-protected trees is very high. Development within RPAs should only be contemplated where it can be demonstrably shown to be unavoidable and fully compliant with BS 5837 principles.

MAIN COMMENTS

Site Layout and Future Resident Pressure (FRP) Observations

The site is characterised by an open field, with tree cover predominantly located along the site boundaries. Several trees are subject to Tree Preservation Orders ref TPO/1482 trees T56 to T62, which have been correctly identified and shown on the submitted plans. No Ancient Woodland or veteran tree constraints are present within or adjacent to the site.

The developable area is centrally located within the field, thereby maintaining a substantial stand-off from the retained boundary trees. This layout minimises direct conflict between built form and tree canopies and rooting areas. Overall, the site layout concerning the proposed dwellings is considered appropriate and unlikely to result in unreasonable post-development pressure on retained trees, although some amendments are needed.

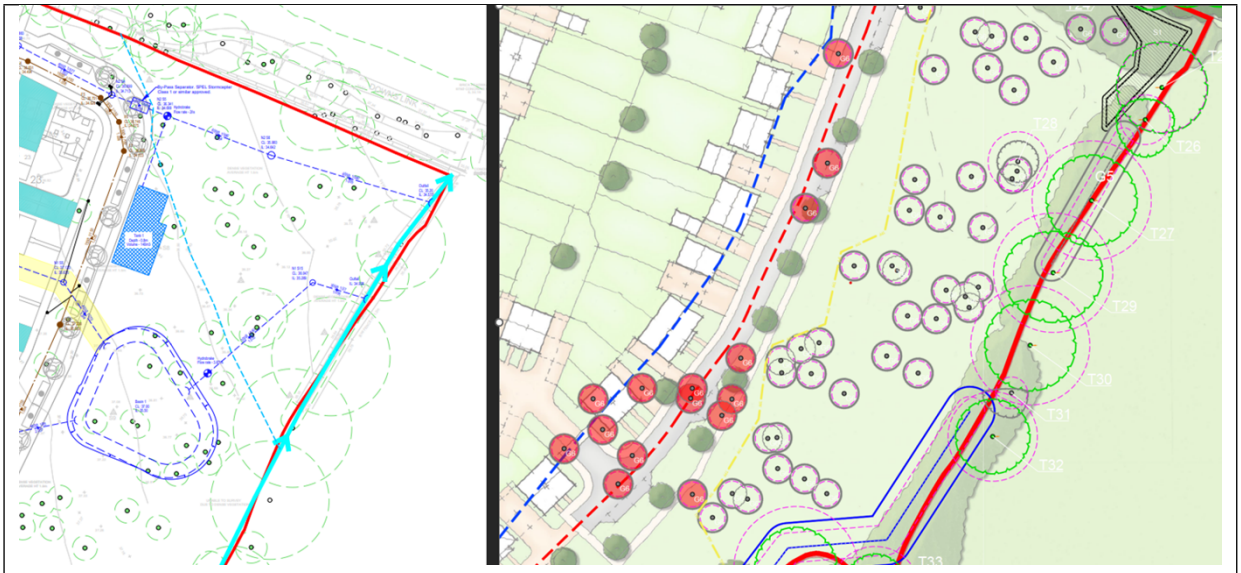
The AIA confirms that no pruning is required to facilitate the development, aside from the potential for minor crown lifting where branches overhang protective fencing during construction. This approach is supported, as it reduces the likelihood of repeated future pruning pressure and promotes sustainable long-term tree retention.

Tree Removal Observations

The proposals as advised in the AIA, would require the removal of four individual trees, one tree group, partial removal of three groups, and one area of scrub. This equates to approximately 6.2–6.3% of the surveyed tree resource, with 93.8% retention overall. No Category A trees are proposed for removal, and only a single Category B tree is affected. The majority of removals relate to Category C and U trees of limited arboricultural or landscape value.

The justification for removal is primarily related to facilitating access, and site layout. This is considered reasonable and accords with BS 5837:2012, which recognises that inappropriate or pressured retention can be detrimental to trees in the long term.

However, there appear to be inconsistencies between the actual number of trees to be removed and the number of trees identified for removal in the Arboricultural Impact Assessment (AIA), particularly when considered alongside the additional plans, such as the Preliminary Drainage Strategy. Specifically, the suds-basin, which appears to be located in the heavily treed area to the east, and its construction would likely require the removal of approximately 11 additional trees, potentially more, depending on the route of the drainage infrastructure, which must connect to the ditch along the eastern boundary.



Preliminary Drainage Strategy Sheet 1 Drawing No 22-011-007 & and TPP extracts.

Therefore, if these trees are to be removed to facilitate the new drainage infrastructure as currently indicated on the plans, they must be accounted for in the calculation of biodiversity net gain and included in the supporting AIA.

Root Protection Areas (RPAs) Observations

The Root Protection Areas (RPAs) for roadside trees T62, T61, T60, T57, and T56 are not considered to have been adequately assessed.

The RPAs for these trees have been plotted as standard circular RPAs without sufficient modification to reflect the presence of the adjacent adopted highway. This approach does not comply with BS 5837:2012, paragraph 4.6.2, which requires RPAs to be reshaped where pre-existing site conditions indicate asymmetric root distribution.

Given the long-established highway infrastructure set within Hays Lane, it is highly likely that root development on the road-facing side of these trees has been significantly constrained by changes in land levels between the site and the Lane, historic excavation, soil compaction, kerbing, and the existing foul drainage system in the center of the Lane, as shown in the preliminary Drainage Strategy Sheet 1 Drawing No 22-011-007. In the absence of a reasoned arboricultural justification, the use of unmodified circular RPAs misrepresents the functional rooting environment of these trees and undermines the reliability of the subsequent RPA incursion assessment.

Historical evidence further supports the significance of these trees: they appear to be present on the 1870–1871 OS map of the area (published 1974), indicating considerable age. Their current size and form are consistent with this assumption. (Please see below)

Specifically, trees T62 and T61 exhibit the hallmarks of old ditch-line trees, with the western roadside edge relatively flat and substantial buttress flaring to the north, south, and east. This morphology strongly indicates that substantial rooting beneath the carriageway, or beneath the far western pavement, as currently suggested in the Tree Constraints and Removal/Protection plans, is very unlikely.

Furthermore, the proposed new hardstanding within the RPAs is considered, in the author's opinion, to fall below the 20% threshold for permissible coverage. However, this assessment is based on the current unmodified RPAs and does not account for the constraint posed by Hays Lane, and the impact this will have had on root development to the west of the trees.

Additionally, it is generally accepted that mature trees such as these are highly susceptible to rapid decline due to sudden changes within their key rooting area. As such, the proposed western road alignment, as currently shown, coupled with the way the RPAs have been plotted, which do not appropriately account for the constrained posed by Hays Lane, implies that there is high likelihood that the trees could be detrimentally affected by the development unless appropriate amendments are made. This point is of importance with regards to the proposed root severance to tree T60 for the new road aliment; I would not consider cutting roots to be an appropriate technical solution to address RPA incursions.

Accurate RPA delineation, reflecting the true rooting environment, is therefore essential to safeguard tree health and ensure compliance with design guidance. Crucially, a key principle of BS 5837 is to avoid development within RPAs wherever possible. The current site layout appears to have been fitted around the existing trees without adequate consideration of their rooting requirements, thereby failing this fundamental principle of avoidance.

As a result, the impact of the proposed development on trees T62, T61, T60, T57, and T56, which are of significant amenity and landscape value, cannot currently be fully ascertained. The following information is required:

- Revised RPA plots for trees T62, T61, T60, T57, and T56, shown as polygons of equivalent area reflecting likely asymmetric root distribution in accordance with BS 5837:2012, paragraph 4.6.2.
- A supporting arboricultural justification explaining the revised RPA geometry.
- An updated RPA incursion assessment where the revised RPAs alter the extent of encroachment.

Without these amendments, there is a high chance that the proposed development could have unassessed impacts on the health and long-term retention of these important lane side trees.

A simple solution to the above points regarding trees T60, T61 and T62, would be to reduce the size of the generously sized rear gardens of the some of the units on the western side of the site. This would allow for the parking bays and road alignment to be modified around the amend RPAs of trees T60, T61 and T62. Which would likely address the above concerns and proved a more sympathetic tree conscious form of development.

ANY RECOMMENDED CONDITIONS: Non at this stage

NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	16/01/2026