



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Units 4 to 5 Redkiln Close Horsham
<b>DESCRIPTION:</b>	Demolition of warehouse building and associated structures. Construction of two no self-contained warehouse units for storage (Class B8).
<b>REFERENCE:</b>	DC/25/0803
<b>RECOMMENDATION:</b>	Holding objection / modification with regards to new development within the Root Protection Area (RPA) of Tree T3
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> The application is supported by an AMS which is a fair assessment of the condition, and development related impacts on trees within and those located outside the site's boundary. However, concerns are raised with proposed development within the RPA of a TPO tree, TPO/0084 served 24-12-1963 and the way in which these works are intended to be undertaken.	

#### **MAIN COMMENTS:**

I have concerns with how the replacement building will encroach on the root protection area of Oak T3 by approximately 10%, due to the way works are planned within the tree's Root Protection Area (RPA). This tree is protected by its location in Area A2 of TPO/0084 served 24-12-1963. The tree is considered to be of an age where it would have been present on the day the TPO was put in place and therefore benefits from its protection.

The proposed development doesn't meet the minimum requirements of BS5837:2012, which outlines best practices for tree protection during development.

para **5.3.1** of the BS states –

***5.3.1 The default position should be that structures (see 3.10) are located outside the RPAs of trees to be retained. However, where there is an overriding justification for construction within the RPA, technical solutions might be available that prevent damage to the tree(s) (see Clause 7). If operations within the RPA are proposed, the project arboriculturist should: a) demonstrate that the tree(s) can remain viable and that the area lost to encroachment can be compensated for elsewhere, contiguous with its RPA; b) propose a series of mitigation measures to improve the soil environment that is used by the tree for growth. - 3.10 structure manufactured object, such as a building, carriageway, path, wall, service run, and built or excavated earthwork. i.e. a new driveway.***

It appears that no overriding justification has been provided for the works in the RPA of T3. Additionally, instead of employing an engineering solution to address the RPA incursions, the scheme proposes direct root cutting within the RPA of T3. This is particularly problematic given that the RPA of the oak tree is already heavily compromised by existing hard surfacing to the north, south, east, and west, which will have acted as a barrier to major root growth and likely restricted its available area for root development to occur. In addition, the tree in question has notable buttress root flair at its base, on the northwestern side, while the southeast side is relatively flat. This would, in my opinion, imply that the tree may have historically been an old ditch line tree, with the ditch being previously sited at its base, on the southeast side.

The significance of this would be that the bulk of its roots will likely be located within the site and in the area of the proposed development due to the historical management of the ditch, and the impact this will have possibly had on root development in the area to the east. While it is acknowledged that there is hard surfacing in the area to the east of T3. However, observations made on site suggest that the depth of the surfacing is limited to only a few inches. Please see photos below, the second photo is taken from where the new building is proposed, and the one with the pen provides an example of the thickness of the surfacing.







The proposed root severance will remove essential structural and fibrous roots, potentially impacting the tree's stability and nutrient uptake. This cumulative impact will, over time, significantly diminish the tree's health and resilience, increasing the likelihood of decline or failure in the short to medium term. As a protected specimen, the oak should be afforded significant consideration in the way in which the redevelopment works at the site are undertaken.

The current proposal will impact the tree's long-term viability for retention and fails to meet the minimum requirements of BS5837. Alternatives should be explored, such as moving the new structure outside the RPA of T3, to satisfactorily preserve this protected tree, which makes a positive contribution to the character and amenities of the locality.

**ANY RECOMMENDED CONDITIONS: N/A**

<b>NAME:</b>	Andy Bush Arboricultural Officer
<b>DEPARTMENT:</b>	Strategic Planning (Specialist Team)
<b>DATE:</b>	14/07/25