HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Former Novartis Site Parsonage Road Horsham West Sussex
DESCRIPTION:	Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.
REFERENCE:	DC/25/0629
RECOMMENDATION:	**Advice / more information / modification**
2nd response in Red	**Holding objection to RPA concerns that have not been addressed or appropriately justified and additional RPA concerns with proposed drainage infrastructure /more information / modification**

SUMMARY OF COMMENTS & RECOMMENDATION:

The application seeks planning consent for a mixed residential-led redevelopment of the former Novartis site. The submitted Arboricultural Impact Assessment (AIA) identifies 30+ individual trees and several hedgerows for removal, primarily due to direct conflicts with the proposed layout or limited remaining life expectancy. While several trees are to be retained and protected throughout construction, others will be impacted by development within their Root Protection Areas (RPAs).

The Conserns relating to development within the RPAs of retained trees has not been appropriately addressed, whereby, there are still instances where root severance is prosed as a technical solution to address RPA incursions. for example with the London Plane tree T009 where part of the adjacent unit would fall with the RPA, although the encroachment of the units foundations may seem modest at 3.27% of the total RPA, The justification for the incursion and root severance is based on that this would allow the building to be built using a standard trench footing, rather than a using a more tree friendly construction method. Additionally,

MAIN COMMENTS:

Tree Removals

Several trees at the site have been allocated a category U rating using the BS 5837 survey methodology and would need to be removed due to poor condition/safety concerns, irrespective of the outcome of the application. These are: T017 (Lime), T010, T011 (Silver Maple), T034, T043 (Cedars), T046, T047 (Silver Maple).

Trees to be felled specifically for development

Individual trees: A001, T001, T003, T008, T013, T014, T015, T016, T018, T019, T020, T032, T033, T035, T036, T037, T038, T039, T040, T041, T042, T044

Hedges: H001, H002 (Cypress, Beech/Cypress).

This totals 30+ trees/hedges being removed to facilitate development.

The proposed removals include mature and early-mature specimens. The key losses from a landscape visual amenity perspective are the 7 TPO'ed Cedars on either side of the main access road in the site and the roadside lime trees. These trees are readily visible from numerous public viewpoints in the area; their removal would be noticeable and would result in short- to medium-term harm to the visual amenity and landscape value that the trees afford to the area. The Cedar trees were protected under TPO/0686 on 28-08-1990. Since the TPO was put in place, only one application for tree surgery/management works has been received, ref NH/62/02 dated 17-05-2002.

Of the cedars, trees T034 and T043 would need to be removed on condition grounds, regardless of the outcome of this application. Additionally, following a recent site visit, it was apparent that T035 had shed a large branch on the northeast side of its crown. As such, its long-term retention is questionable and would be problematic with the change of use of the site. Given the likely removal of T035 in the years ahead as its condition declines, this forthcoming action would result in only one of the cedars remaining on the northern side of the access road, and thus, the avenue of cedars would be lost as an individual landscape feature.

Atlantic cedar, while often prized for its stately form and blue-tinted evergreen foliage, can present significant challenges in urban environments, particularly near residential or commercial buildings. As these trees mature, they are prone to shedding large limbs without any obvious warning signs. In his '**Observations on Selected Tree Genera and Species'**, Lonsdale (Principles of Tree Hazard Assessment and Management, DETR, 1999, Appendix 2) notes that the genus Cedrus has a high propensity to form weak forks; for fork failure, and to fail due to decay. He also advises that "**branch failures at the points of attachment are reported in the commonly grown variety of the Atlantic cedar, Cedrus atlantica var. Glauca."**

As noted above, due to their broad canopy and heavy lateral limbs, cedars can pose an increased risk where pedestrian access, vehicle traffic, and occupied buildings are located nearby. Given the intensification of use planned for this site, retaining these trees while transitioning to more intensive use would likely result in a gradual and reactive approach to their future management, and an eventual staggered removal of individual trees, prompted by safety incidents or health decline. The alternative option, as proposed by this scheme, would likely offer a managed and planned removal, which could allow for coordinated replacement planting that can be integrated with the site's overall landscaping strategy.

Notwithstanding, the loss of the seven Atlantic cedars will impact the site's visual character. Therefore, any final decision on this should be balanced against the potential increased safety risks these mature cedars would pose in an urban setting; weighed against replacing them as part of a coordinated, forward-looking landscape plan which could ensure that appropriate species can be selected to enhance the amenity of the site more sustainably.

The cedars are proposed to be replaced with an avenue of ***Metasequoia glyptostroboides*** (Dawn Redwood), a fast-growing species of deciduous conifers that can tolerate a range of growing conditions, is pollution-tolerant, and is not susceptible to many common tree pests or diseases. They have good autumn colour and attractive fluted growth at their base, and reddish-brown bark. If the application is approved, the use of Dawn Redwood would be a suitable species to replace the cedars and could likely reinstate a similar level of amenity/landscape value within a relatively short space of time — in tree terms, of 20 to 30 years.

The loss of the lime trees T013–T020, to allow for the apartment block south of Parsonage Road to be erected as proposed, would be noticeable and result in a loss of roadside trees of high amenity and landscape worth. While some of the removals are justified on poor condition grounds, trees T013, T016 and T020 appear to be in reasonable condition, and the justification for their removal is based on the delivery of the scheme, rather than condition grounds.

Root Protection Area Conflicts Observations

The Root Protection Areas (RPAs) for the retained trees T049, T002, T004, T006, T007, and the trees in G002 have been plotted using a uniform circular radius method, based on trunk diameter as outlined in BS 5837:2012 section 4.6.1. However, this default approach assumes symmetrical root growth in unconstrained soil, which does not reflect the actual site or off-site conditions. The RPAs for these trees should be adjusted to better reflect the built environment that surrounds them.

Paragraph 5.3.1 of the BS states:

"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)."

The development will impact RPAs of several retained trees. These are: T009 (London Plane): 3.27% RPA encroachment for residential foundation. Linear root pruning is proposed to address the incursion. I would not consider root pruning to be an appropriate technical solution to address the RPA incursion; consideration should be given to moving the building out of the RPA to limit the impact on T009.

G002 group of 3 off-site Oaks (WSCC Highways trees): The RPAs of the central/westernmost trees are affected by the apartment block. The AIA advised that they consider the encroachment justified due to prior disturbances (e.g., highways/services). Additionally, the AIA advises that the presence of trees T016, T017, and T018; all of which are shown for removal, may have restricted significant root encroachment into the site's curtilage as shown on drawing no. 11380-D-AIA.

Given the high landscape value of the trees in G002, coupled with the potential loss of trees T013–T020, it is important to fully ascertain whether the roots of the trees in G002 will be impacted by the apartment block, as their RPAs have been plotted under the adjacent highway, and the new building. The area under the road would generally be accepted as an inhospitable rooting medium that would have restricted any significant root growth in this area. Therefore, more detailed information and site investigation works should be provided/undertaken to support this assumption that no major roots of the trees in G002 will be impacted by the new apartment block. Concern not addressed.

The RPAs of the off-site Oaks within G2 are still plotted using the standard circular RPA, which is shown to extend under Parsonage Road to the north. This method of plotting the RPA does not appropriately consider the impact that the road may have had on root distribution in this area.

The westernmost oak within G2 exhibits the characteristics of an old ditch-line tree, whereby the roadside edge is relatively flat, and it has a pronounced buttress root flare on the southern side. This is consistent with a tree that historically grew next to a previously maintained ditch. This feature strongly suggests that the main rooting area for this tree is likely located primarily to the south, within the site. The presence of the adjacent highway further supports this assumption.

para 4.6.2 of BS5837 states – "**4.6.2** ***The RPA for each tree should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution."***

While it is noted that additional tree coverage exists at the site, principally T016, T017, and T018. The assumption that these trees would have acted as a barrier to any significant roots from the G2 trees has not been adequately demonstrated. Given that the area to the south of the trees has historically been maintained as soft ground, and considering the built environment surrounding the G2 trees, it is highly likely that roots from the G2 trees extend into the site, including the area where the new apartment block is proposed.

It is noted that in para 4.3.2 of the AiA, the author considers that "***adjacent offsite highway improvement works and associated service installation between G002 and the proposed apartments, which are likely to have resulted in root disturbance to G002.*** Given the unknown extent of the works that have taken place in this area, it is not currently possible to determine if these works will have affected rooting pattens in the area; more info needed/ SV to confirm location of offsite works.

Due to the high landscape value of the trees in G2, coupled with the number of mature trees indicated for removal to facilitate redevelopment of the site, it is vitally important that these trees are not compromised by substantial development occurring within their key rooting areas.

Additionally, due to the extent of existing hard surfaces within the RPAs of the trees in G2, any additional development would likely increase the proportion of hard surfaces beyond

the 20% threshold recommended in BS 5837, para. 7.4.2. Design recommendations—7.4.2.3 states that new permanent hard surfacing should not exceed 20% of any existing unsurfaced ground within the RPA. This limitation applies to any new hard surfacing within the RPA, regardless of the construction method.

T009: 5% RPA encroachment for a retaining wall. Linear root pruning is again advised. I would not consider root pruning to be an appropriate technical solution to address the RPA incursion; consideration should be given to moving the wall outside of the RPA. Concern not addressed.

T002, T006, T007: Outbuildings erected using "no-dig" or base-and-beam foundations. The outbuildings, such as bike stores, should be moved and kept outside of the RPAs. The bike stores still appear to be shown within the RPAs of trees T002, T006, and T007. Given the trees' visually prominent roadside locations and high landscape value, the bike stores should be relocated outside of the RPAs. Modification is required

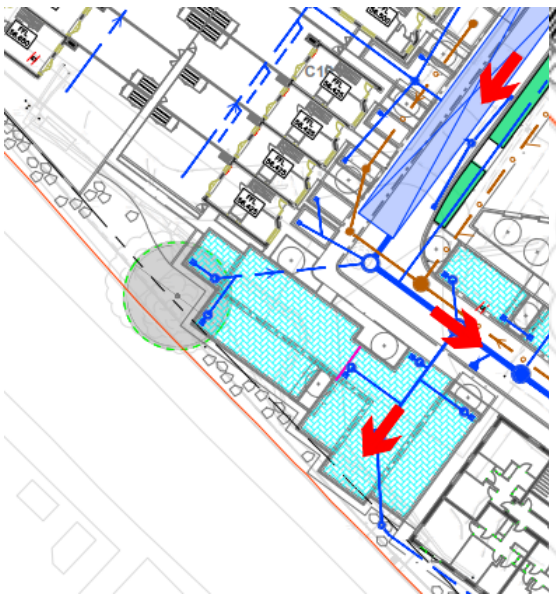
T002, T004, T006, T007, T048: Fencing installed using Met-Posts to avoid digging; no concerns.

T009, T045: "No-dig" surfaces will be needed, and if approved, should be secured by condition.

T048: 3.27% encroachment, proposed linear root pruning instead of "no-dig."; Root pruning should be avoided. Concern not addressed.

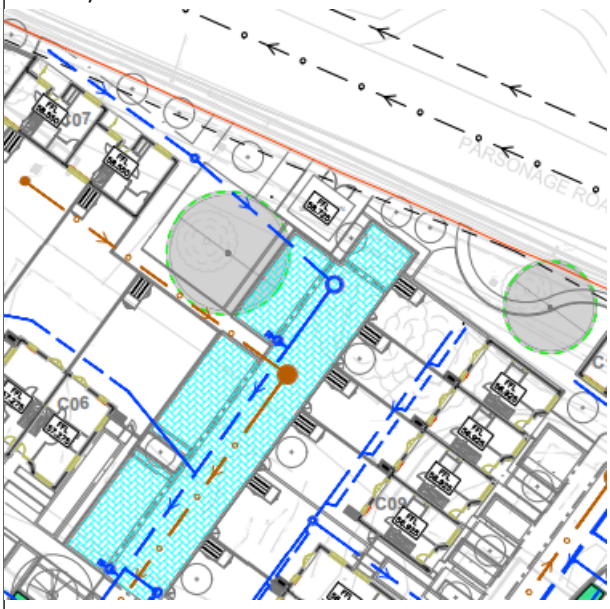
Services and drainage routes have not been provided; these will need to be kept outside the RPAs of retained trees. Concerns raised regarding underground services within the RPAs of trees T045, T048, T009, and Group G2. Please either modify the routing of these services or provide confirmation that any works within the RPAs will be carried out using trenchless construction methods, such as impact moling or thrust boring; more information needed.

T045,



T048,

T009,



G2,

Where the use of no-dig construction methods is proposed in the RPAs of retained trees, it is acceptable in some instances, and it is acknowledged that the extent of all the incursions falls below 20%. Nonetheless, some adjustment to the site layout is needed to reduce the need for any root pruning, as root pruning to address RPA conflicts is not considered to be appropriate.

Site layout / Future Residents pressure observations

Future residents are likely to have concerns with and experience common tree-related issues, such as falling twigs, leaf litter, sap and bird excreta, with the trees T002, T004, T006, and T007. The location of these trees at the end of the rear gardens of the affected units will be worse for T002 and T004 due to the modest size of the gardens. This will also be the case for trees T0048 and T045, due to their location on the southern boundaries of the rear gardens and the impact they may have in terms of the levels of natural light entering the gardens and the rear of the properties.

The current site layout suggests that there is the capacity for post-development future resident pressure for further pruning or felling. As such, these trees would benefit if the size of the rear garden areas were increased, coupled with additional protection measures to control any post-development tree works, should the scheme be approved.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	Andy Bush Arboricultural Officer
DEPARTMENT:	Strategic Planning (Specialist Team)
DATE:	07/08/25 19/12/25