



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Units 4 to 5 Redkiln Close Horsham
DESCRIPTION:	Demolition of warehouse building and associated structures. Construction of two no self-contained warehouse units for storage (Class B8).
REFERENCE:	DC/25/0803
RECOMMENDATION:	Holding objection / modification with regards to new development with the Root Protection Area (RPA) of Tree T3
Second response in Red	Advice
SUMMARY OF COMMENTS & RECOMMENDATION: 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.

The revised position of the building is acceptable in arboricultural terms as it now maintains a respectful offset from protected tree T3, ensuring that its root protection area and canopy spread remain uncompromised from the development proposals at the site.

The proposed crown reduction surgery to T3 is limited to only trimming back the lateral growth by approximately one metre, is a minor intervention that will not result in physiological harm, structural instability, or long-term decline. This level of pruning is consistent with good arboricultural practice and will not diminish the amenity value that T3 contributes to the wider character of the area.

Furthermore, the removal of trees T1, T2, and T7 has been assessed as having no significant landscape impact, as these specimens are of limited visual prominence.

Subject to the implementation of the recommended tree protection measures during construction, the proposals will also maintain the integrity of the group G1PA trees, preserving their collective canopy and maintaining the important screening function they provide along the site's boundary.

ANY RECOMMENDED CONDITIONS: Yes

6.8 Arboricultural Method Statement - Implementation

Regulatory Condition: All works shall be executed in full accordance with the submitted Arboricultural Impact Assessment/Method Statement prepared by PJC Consultancy Ltd on behalf of Bailey Total Building Envelope Ltd, Document ref: PJC/6768/25/01 Rev 01 dated 11 September 2025

Reason: To ensure the successful and satisfactory protection of important trees, shrubs and hedges on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework (2015).

Pre-commencement Condition: No development shall commence, including demolition pursuant to the permission granted, ground clearance, or bringing equipment, machinery or materials onto the site, until the following preliminaries have been completed in the sequence set out below:

- i. All trees on the site shown for retention on approved drawing number Tree Protection Plan, Drawing no: PJC/6768/25/C dated 06 November 2025, as well as those off-site whose root protection areas ingress into the site, shall be fully protected throughout all construction works by tree protective fencing affixed to the ground in full accordance with section 6 of BS 5837 'Trees in Relation to Design, Demolition and Construction - Recommendations' (2012).
- ii. Once installed, the fencing shall be maintained during the course of the development works and until all machinery and surplus materials have been removed from the site. Areas so fenced off shall be treated as zones of prohibited access and shall not be used for the storage of materials, equipment or machinery in any circumstances. No mixing of cement, concrete, or use of other materials or substances shall take place within any tree protective zone, or close enough to such a zone that seepage or displacement of those materials and substances could cause them to enter a zone.
- iii. Before any work begins on site, the person(s) responsible for supervising the works must meet the Arboricultural Officer of the Local Planning Authority, on site, so the Arboriculturist Officer can supervise that the tree protection measures have been installed in accordance with the approved drawing number Tree Protection Plan, Drawing no: PJC/6768/25/C dated 06 November 2025.
- iv. Any trees or hedges on the site which die or become damaged during the construction process shall be replaced with trees or hedging plants of a type, size and in positions agreed by the Local Planning Authority.

Reason: As this matter is fundamental to the acceptable delivery of this permission, in the interests of amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

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