



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land East of Tilletts Lane Warnham
DESCRIPTION:	Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure.
REFERENCE:	DC/25/1155
RECOMMENDATION:	Advice / Modification / Holding Objection to the current position of the access road within the RPA of T59, and the foreseeable impact this will have on the tree's viability for long term retention.
SUMMARY OF COMMENTS & RECOMMENDATION: The application has been supported by a detailed Arboricultural Impact Assessment and Preliminary Methods Statement, and a Tree Protection Plan, however, concerns are raised with the site access and the foreseeable impact this will have on the off-site Oak T59 with regards to tree's viability for successful long-term retention.	

MAIN COMMENTS:**Trees Proposed for Removal**

Four individual trees and sections of Groups G4 and G7, along with the majority of Group G6, are proposed to be removed to facilitate development proposals at the site. These are:

- T47 (Hornbeam, Category B12)
- T63 (Common Ash, Category C2)
- T64 (English Oak, Category B12)
- T65 (Blackthorn, Category C1)
- G4 (partial, mixed species, Category C1)
- G6 (majority, mixed species, Category C1)
- G7 (partial, mixed species, Category C1)
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None of these trees are subject to statutory protection (TPO/CA). The proposed removals relate to lower-quality Category B and C trees; all Category A specimens, veteran oaks, and principal arboricultural features are retained.

Root Protection Area (RPA) Observations

The following retained trees will experience partial RPA incursions:

- T36 (Hornbeam, 6.8%) – Access footpath
- T37 (English Oak, 7.2%) – Access footpath
- T59 (English Oak, 8.8%) – Access road
- T60 (Sycamore, 3.8%) – Access road
- T61 (Common Ash, 11.4%) – Access road
- T62 (Common Ash, 6.9%) – Access road
- T70 (English Oak, 15.7%) – Access footpath
- T71 (English Oak, 7.2%) – Access footpath
- G8 (Mixed species) – Semi-formal footpath

BS 5837:2012 *Trees in relation to design, demolition and construction – Recommendations* states at 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."

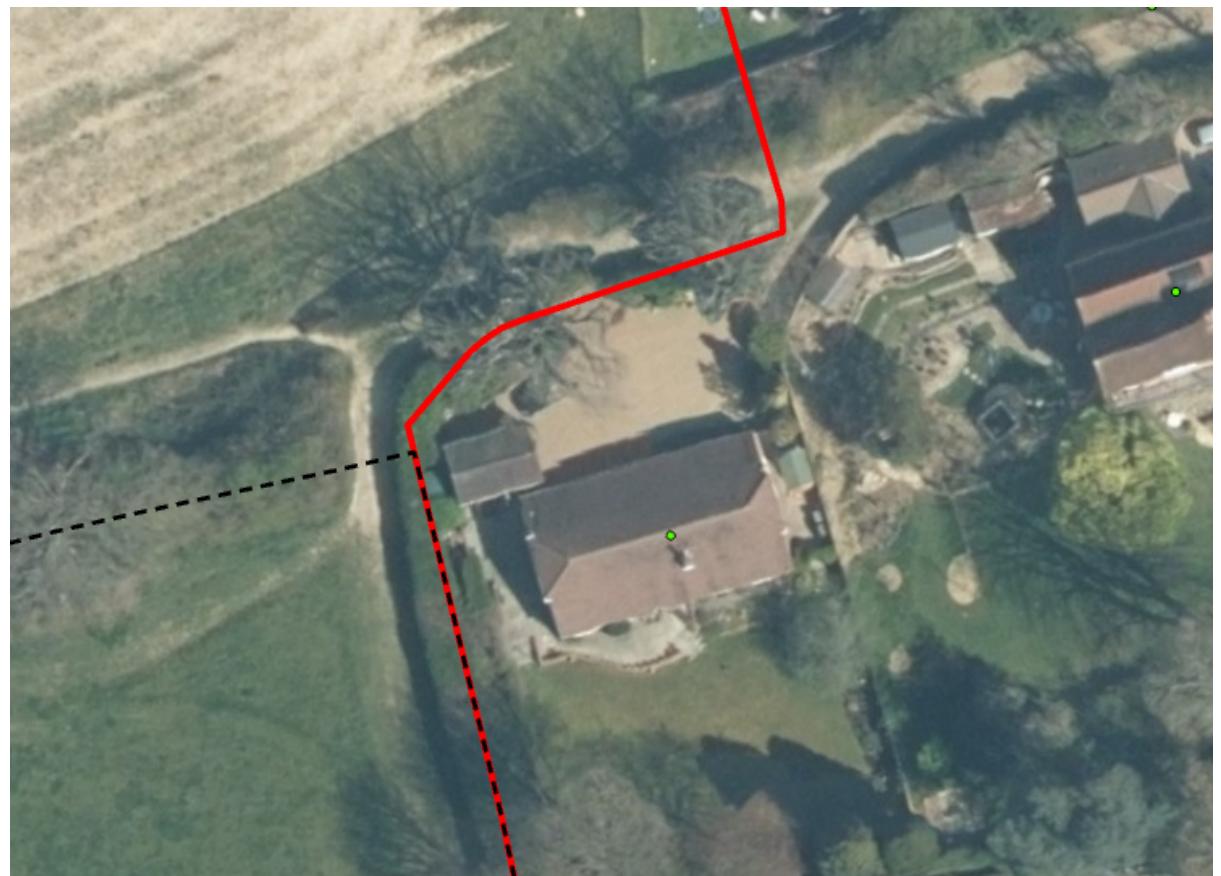
(Definition 3.10: Structure – manufactured object such as a building, carriageway, path, wall, service run, or built/excavated earthwork.)

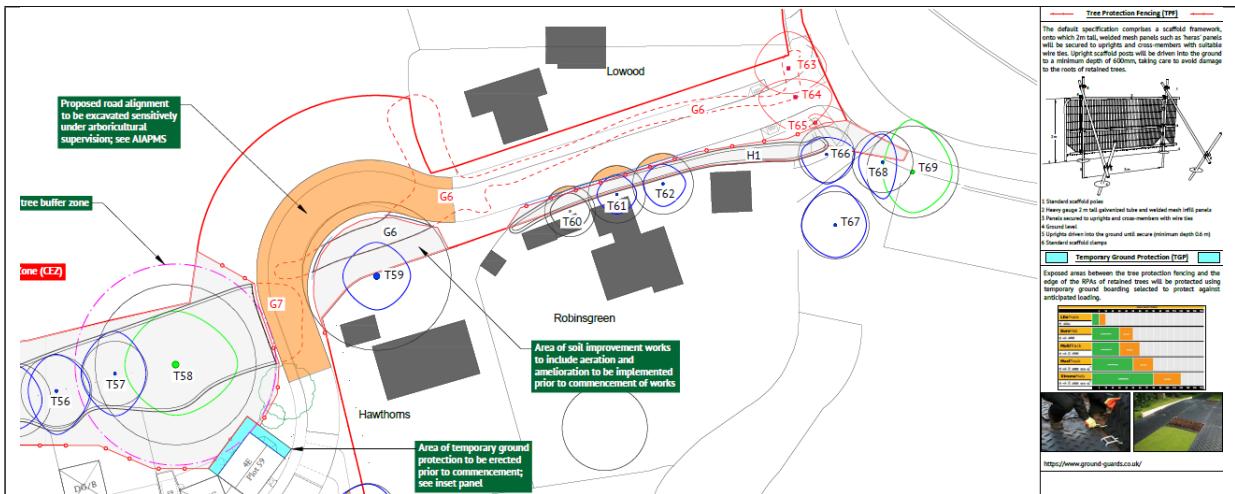
The BS also advises at 7.4.2.3: "*New permanent hard surfacing should not exceed 20% of any existing unsurfaced ground within the RPA.*"

The proposed RPA incursions are, for the most part, below the 20% threshold typically considered acceptable under BS5837. However, it is noted that no overriding justification appears to have been provided to demonstrate why works within RPAs are required. Furthermore, all the RPA incursions all currently propose excavations for the access paths and roads, rather than adopting less invasive above-ground construction methods. This is unsatisfactory; above-ground solutions should be considered wherever feasible, and where they are not, clear justification must be provided.

My primary RPA concern is with the proposed access road, which extends into the RPA of T59, a mature Category B2 English Oak located within the curtilage of Hawthorns, Knob Hill, Warnham, and just within a designated Conservation Area. The tree is readily visible to users of the PROW to the north, and despite being subject to fairly robust pruning works, it still makes a positive contribution to the character and amenities of the locality.

The area immediately south of T59 is occupied by the property's principal parking area and garage. The tree sits on slightly elevated ground relative to this area, possibly due to excavation works undertaken to create a level surface at the time of property construction. The parking area is predominantly surfaced with shingle, please see below



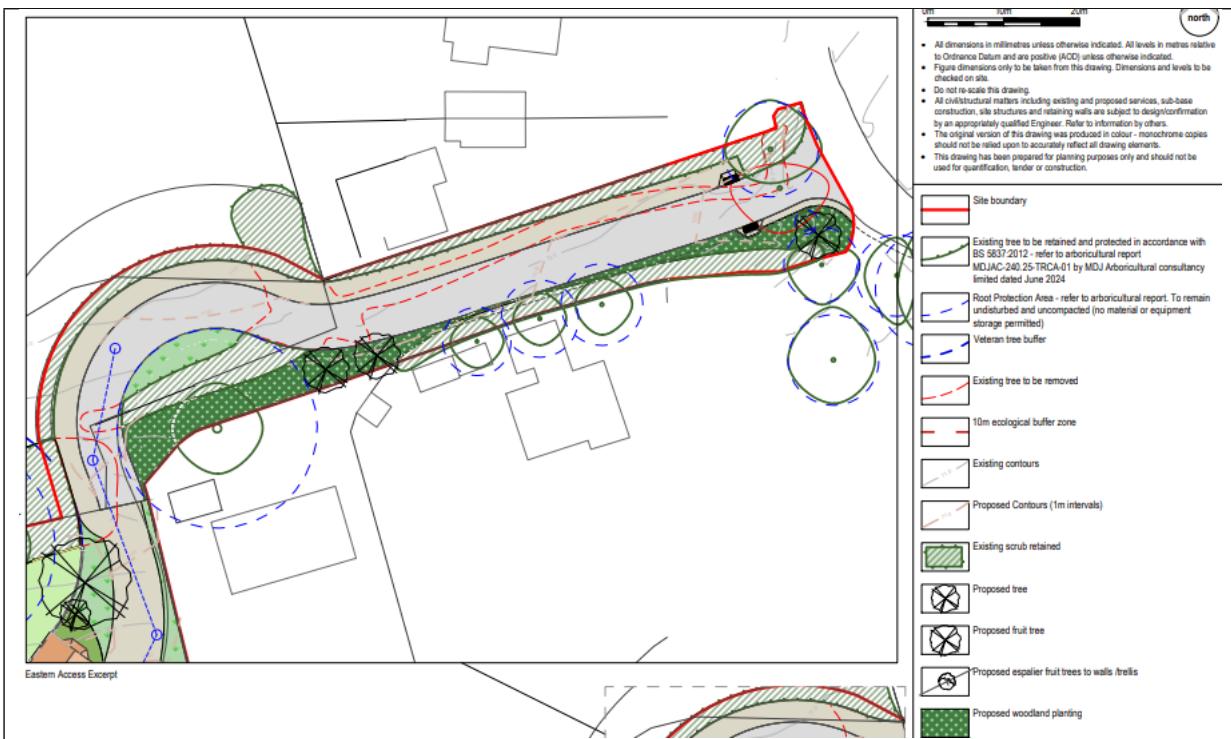


Para 4.6.2 of the BS advised – “The RPA for each tree should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon of equivalent area should be produced. Modifications to the shape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

Due to the constraint posed by the change in land levels and the parking area to the south of T59, it would imply that the tree’s principal rooting area lies to its north, beneath the compacted trackway/PROW, where the new site access is shown. Whereby, the long-standing parking area to the south has most likely impeded any significant root development in that direction and, in itself, constitutes a significant proportion of hard surfacing within T59’s RPA, as indicated on the Tree Protection Plan. When combined with the proposed 8.8% incursion, the cumulative extent of hard surfacing within the RPA would exceed the tolerable limits of 20%, as advised in the BS.

As such, even with the proposed mitigation, the excavation required for the road would almost certainly result in the loss of a significant proportion of T59’s key rooting area and rooting volume. This action would be detrimental to the trees health and compromise its long-term retention potential.

Furthermore, the proposed drainage strategy indicates that underground services requiring open trenches would also fall within T59’s RPA, as with the building of the road, this action and the root severance that it would entail have the capacity to significantly impact T59’s condition and long-term retention potential and is unsatisfactory.



Post-Development Pressure Observations

Plots 43, 52, and 53 fall within shading arcs of Group G2, T41, and T42 (southern boundary). These broadleaf deciduous species of tree, provide dappled light in summer and reduced shading in winter. The proposed garden layouts generally avoid excessive canopy overhang, and the site layout demonstrates due consideration of shading and future resident pressures, in accordance with Clause 5.6 of BS5837.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	Andy Bush Arboricultural Officer
DEPARTMENT:	Strategic Planning (Specialist Team)
DATE:	02/10/25