



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land East of Mousdell Close Rectory Lane Ashington
<b>DESCRIPTION:</b>	Erection of 74 dwellings with associated access, parking and landscaping.
<b>REFERENCE:</b>	DC/25/1327
<b>RECOMMENDATION:</b>	<b>Advice/ Modification/ More information</b>
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> The proposed development, as supported by the submitted Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS) and Tree Protection Plans (TPP), however, concerns are raised with incursions into Root Protection Areas (RPAs), and poor spatial relationships between retained trees and new dwellings, which are likely to impact on existing trees and give rise to future pressure for robust surgery works, or in the worst case their removal.	

## **MAIN COMMENTS:**

### **Tree Removals and Surgery Works**

One individual tree (T44 – Goat Willow) is proposed for removal to facilitate the widening of the main site access. Due to its roadside location, its loss will be noticeable within the street scene; however, subject to appropriate replacement planting in this area, the visual and environmental impact can be adequately mitigated.

Two hedgerows (H01 – Mixed Species Ornamental Hedgerow, and a section of H41 – Mixed Species Native Hedgerow) are also indicated for full or partial removal. As with T44, their loss can be compensated for through appropriate replacement planting.

Surgery works are proposed for trees T08, T09, T42, T43, and T38. Works involve selective branch removal to provide a minimum clearance of 3.5 m from ground level to crown break to enable construction access. Additionally, the western aspects of trees forming group TG14 will require reduction to align with the new fence line.

Subject to all the surgery works being undertaken in accordance with BS 3998:2010 – Tree Work: Recommendations, I would not have any concerns with the works proposed.

### **Site Layout, Post-Development Pressure, and Future Tree Conflicts**

Several dwellings, particularly those on the northern and eastern perimeters, are sited near large mature trees whose canopies will overhang the front of the dwelling for unit 54, and over the private rear gardens of several properties on the eastern boundary. This arrangement is likely to create future pressure for pruning or removal due to shading, leaf and debris fall, and perceived safety concerns.

The unit's most affected on the eastern boundary are Nos. 6, 7, 8, 9, 10, 12, 13, and 15, where the RPAs of boundary trees significantly extend into main garden areas. On the western boundary, Unit 33 is notably affected by trees T34 and T36, which will restrict natural light to the main garden area, particularly during afternoon hours.

BS5837:2012, Section 5.2.2, emphasises the importance of providing adequate spatial separation between retained trees and new structures to prevent foreseeable conflicts.

The gardens provided are generally small and dominated by RPAs and canopies of retained trees, leaving little usable space for residents and increasing the likelihood of long-term attrition of tree cover. As proposed, the layout is not sustainable in arboricultural terms.

### **Root Protection Area (RPA) Conflicts**

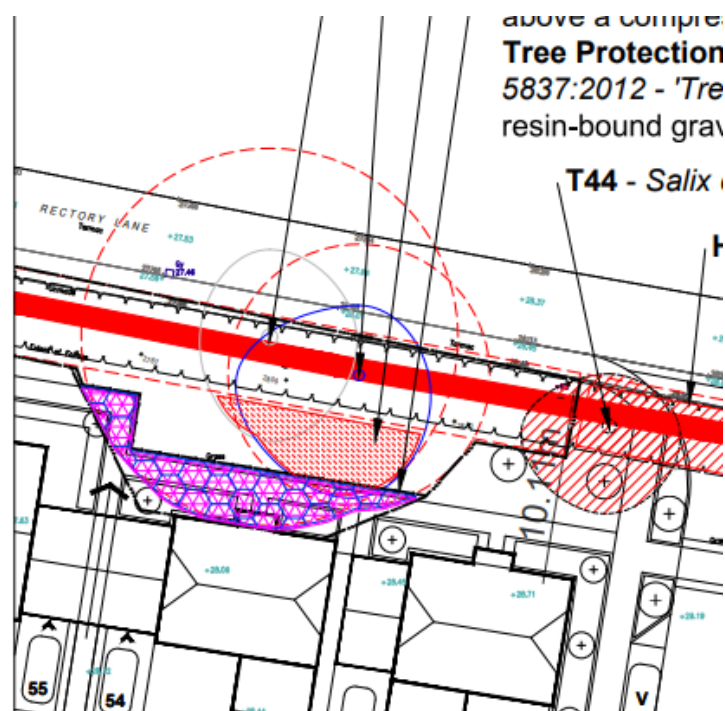
Several Category B and C trees and groups identified for retention are shown with building footprints or private gardens extending significantly within their RPAs. BS5837:2012, Clause 5, requires development layouts to be based on accurate tree constraint plans that avoid RPA incursions wherever possible. In places, the layout appears to have been fitted around existing trees without due regard for their rooting requirements, thereby failing the first principle of avoidance.

Affected trees and hedges include H01, T02–T09, T14–T23, T34, T36, T38, a portion of SC39, and T42–T43.

Under BS5837:2012, Section 5.3.1, incursions into RPAs should only occur where overriding justification can be demonstrated, supported by appropriate mitigation. No such justification or mitigation has been provided. Given the undeveloped, greenfield nature of the site, there appears to be no reasonable justification for development within RPAs of retained on or off-site trees.

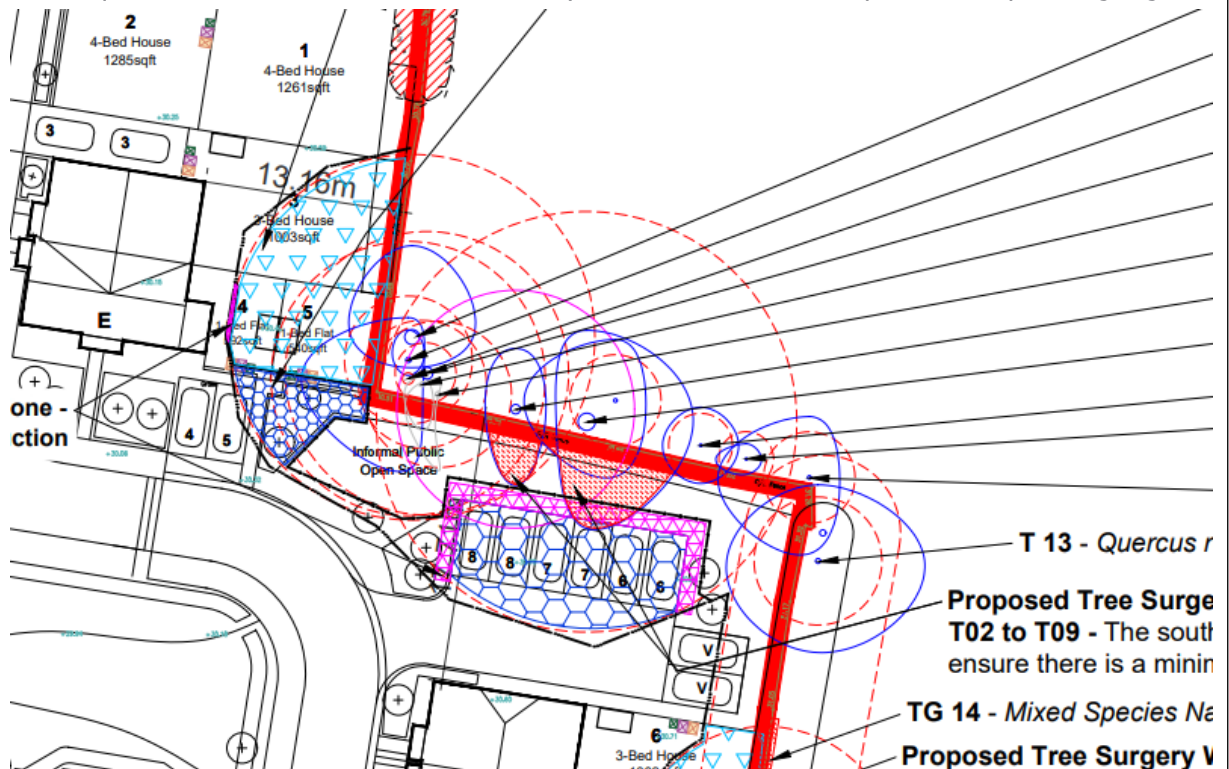
Another observation regarding potential future conflicts with Root Protection Areas (RPAs) arises where the RPAs of the eastern boundary trees extend considerably into the main garden areas of plots 6, 7, 8, 9, 10, 12, 13, and 15. Although, for the most part, the RPAs are shown to remain free from building activity during the construction phase of the proposals, consideration should also be given to the likely post-development activities within these garden areas. Such activities may include the creation of patios, shed bases, raised planters, flower beds, and additional planting, all of which would fall directly within the RPAs. Therefore, although the built form of the proposed dwellings may lie outside the RPAs of the trees in question, there are foreseeable post-development pressures and associated root damage and ground compaction risks to such areas.

Furthermore, the RPAs for T42 (Sycamore) and T43 (Oak) have been plotted as standard circular areas extending beneath Rectory Lane, which is best described as being an inhospitable rooting environment. Rooting is therefore more likely concentrated southwards within the site and potentially beneath Unit 54. The current circular RPAs for both trees do not reflect this, and consequently, in my opinion, underestimate the potential impact of the proposed development and its associated infrastructure on T42 and T43. The RPA for these trees needs to be amended to better consider the long-standing relationship that T42 and T43 will have had with the engineered road to the north, and the impact this will have had on any significant root development in this area under the road, and with the site.



*BS5837:2012, Paragraph 4.6.2 advises, - 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.*

The proposed development encroaches on the Root Protection Areas (RPAs) of several off-site trees, as shown on the plan below. Although these trees are of limited individual quality, collectively they form an important visual and screening feature for the adjacent property, making their retention desirable for the adjacent property. Construction activity within the RPAs has the potential to adversely affect tree health through soil compaction, root damage, or changes to ground levels. The use of above-ground construction techniques in this area would be necessary, as the AIA and tree protection plan highlights.



The proposed drainage ditch along the southern site boundary appears to intersect the RPAs of mature boundary trees associated with the adjacent woodland belt. No root investigation, hydrological assessment, or construction methodology appears to have been provided to demonstrate compliance with *BS5837:2012, Section 7.7*, which requires avoidance of root severance and ground disturbance. Excavation of a continuous ditch in this location poses a high risk of root damage and potential alteration of local hydrology, leading to long-term decline of the boundary trees. More information is needed on this aspect of the scheme.

### **Conclusion and Recommendation**

The current layout does not fully align with key principles of *BS5837:2012*, particularly in relation to the avoidance of RPA incursions and provision of sufficient spatial separation between retained trees and new dwellings. The design places pressure on existing tree cover, creating foreseeable future conflicts and a likelihood of tree loss over time. Layout modification should be sought, and additional supporting information should be requested before the scheme can be considered acceptable in arboricultural terms.

**ANY RECOMMENDED CONDITIONS: None at this stage**

<b>NAME:</b>	Andy Bush Arboricultural Officer
<b>DEPARTMENT:</b>	Strategic Planning (Specialist Team)
<b>DATE:</b>	27/10/25