Wickhurst Green, Broadbridge Heath, Horsham

RESPONSE TO TREE OFFICER COMMENTS

Document Ref: VYH24567_technote (25.11.25)

Introduction:

ACD Environmental Ltd. (ACD) have been instructed by Vistry Group to provide response to comments received by Horsham District Council in regard to the proposed arboricultural impacts of the proposed development at Wickhurst Green, Broadbridge Heath, Horsham (planning reference: DC/25/0894.

The Local Planning Authority is Horsham District Council who can be contacted at:

Address: Horsham District Council (Planning), Albery House, Springfield Road, Horsham, RH12 2GB.

Email: planning@horsham.gov.uk

Telephone: 01403215187

Reference should be made to the latest revision of the corresponding Tree Protection Plan and Arboricultural Impact Assessment/Method Statement Report for the site produced by ACD (file references:' VYH24567-03B' and 'VYH24567aia_amsB', respectively).

Any questions relating to the content of this report should be directed in the first instance to: ACD Environmental, Unit 7, Godalming Business Centre, Woolsack Way, Godalming, GU7 1XW, 01483 425714, quoting the site address and report reference number.

Summary:

The following comments have been received from the Horsham District Council (HDC) Tree Officer (2nd comments dated 21/11/25):

"*The Root Protection Areas (RPAs) for trees T31, T19, and T34 are still not considered to be plotted in accordance with BS5837:2012 (Section 4.6.2). whereby, existing off-site hardstanding within the northern portions of the RPAs of T31 and T19, and to the east of T34 where the RPA extends beneath Old Whickhurst Lane, has not been considered, offset, or modified to reflect the likely asymmetric rooting environment created by these off-site constraints.*

BS5837:2012 requires that where existing obstacles or surfaces constrain root development, the RPA should be amended to show where roots are most likely to occur. In this case, the off-site car park to the north of T31 and T19, which is clearly visible on the indicative site plan, has been omitted from the Tree Protection Plan. This results in a misleading representation of the trees' functional rooting environment and raises concern as to why this constraint has not been factored into the arboricultural assessment, particularly as it was raised in my previous response.

For both T31 and T19, nearly half of the theoretical RPA is currently shown extending beneath an impermeable car park surface to the north. This means that any additional encroachment into the remaining functional (southern) portion of the RPA becomes significantly more critical. As such, based on the current assessment the proposed cycle path, to the south of the trees, in particular, would in my opinion, increase development within the RPA as is currently shown well beyond the 20% threshold generally accepted within BS5837, further exacerbating non-compliance with the BS.

Given the likely southward rooting bias for T31 and T19, caused by the existing hardstanding, the proposed new road to the south is expected to lie partially or wholly within the functional RPAs of T31 and T34. No mitigation measures appear to have been proposed to address this conflict. As such, the scheme is not considered to be compliant with BS5837 and is likely to result in significant, delayed-onset harm to these trees, (which make an important contribution to local character and visual amenity of the area), over the next 5–10 years, due to construction activity and root loss/damage within their key rooting areas, unless the layout is amended accordingly.

Tree Protection Plan DWG NO: VYH24657-03A Sheet 2 of 2. It should be noted that the date on the new TPP has not been updated from the 17/04/2025 submission, despite the plans and site layout having been altered.

Several retained trees (T39, T40, T41) have canopies that overhang proposed dwellings. These are proposed to be pruned to allow 1.5m clearance for construction….thus, the proximity of retained trees to some of the new plots will, in my opinion, result in foreseeable future pressure to remove or prune them heavily, contrary to the guidance set within the BS. In short, if you need to undertake surgery works simply to build the new dwelling, this would imply that it is likely that the future residents will also have concerns with the proximity of the tree to the new property.

The key trees of concern for overshadowing, shading and tree-to-build proximity are,

T39, T40, T41 all Oaks. These are large, mature trees indicated for retention near residential units - plots 64, 50, 51, 52, and 55. The AMS advises that crown pruning will be needed to allow 1.5m clearance for the scaffolding required to erect the new dwelling in Plot 64, which would imply that as the trees recover from the works and develop new growth their canopies will overhang proposed buildings and likely shade both gardens and rear elevations of the affected buildings.

The tree protection plan (TPP) shows that plots 50, 51, 52, and 55 specifically required partial removal of G7 to create "adequate garden space". Suggesting these plots will likely experience significant shading issues seasonal leaf litter, and other tree related detritus, caused by the adjacent mature trees. Even with some above ground pruning, retained sizable trees near to plot boundaries are likely to cause post-development tree-related concerns with the new occupiers, leading to future pressures for further pruning or felling, contrary to the precautionary principle of BS set out in para 5.3.4 a).

No specific shadow path analysis or shade diagrams have been provided to support the application.

The current layout underestimates tree-related constraints within and those outside of the site and may expose critical roots to damage during development, coupled with post-development pressures to heavily prune or remove trees of high visual amenity value indicated for retention.

Concerns mostly addressed, whereby the amendments to the site layout in this area now provided a better degree of spatial separation between the retained trees referenced above and the built form the proposed dwellings in the area.

Recommendation: Objection maintained, as modification is still needed to address Root Protection Area conflicts and concerns."

Response:
Following the comments received, the corresponding Tree Protection Plan and Arboricultural Impact Assessment/Method Statement has been revised (rev B) to address the comments and provide further assessment.

Amended RPAs (T4, T19, T31 & T34):
The RPA of trees on the boundaries where the standard circular RPA projection encroaches into existing offsite hard surfacing, have been evenly amended to provide an RPA of equivalent area within soft ground outside of the existing surface footprints. Existing surfacing footprints have been informed using OS map data supplied as part of an updated layout.

T4 (Oak):
The amended RPA for this tree results in an incursion by proposed pedestrian/cycleway hard surfacing equivalent to 13.88% of the amended RPA. this encroachment is proposed to be mitigated through the use of a no-dig surfacing design incorporating a Cellular Confinement System and a porous wearing surface installed over exiting ground levels.

A temporary fencing alignment has been specified to protect the RPA within the proposed surface footprint prior to installation. Following installation the retained RPA with be protected either through the primary fencing alignment or the new surface, which is to act as adequate ground protection.

T19 and T34 (Oaks):

The amended RPAs for these trees on the northern boundary now extend into the proposed roadside parking bays and marginally into the footprint of the main vehicular carriageway, as well as resulting in a larger area of no-dig surfacing required for the pedestrian/cycleway surface encroachments.

The proposed excavation within the RPA of T19 is equivalent to just under 10.5% of the total area of the amended RPA and 8.2% for T34. These excavations have been specified to be conducted using a sensitive methodology under direct supervision from the project arboriculturist.

Whilst it is acknowledged root loss is a potential impact due to these excavations, it is reasoned that given the excavation footprints are located towards the periphery of the RPAs, the loss of connected significant or structural root structures due to pruning within the wider RPA will be limited, and that use of a sensitive methodology under supervision will ensure that any impact to roots can be suitably quantified and proper pruning techniques carried out in accordance with best industry practices.

It is further considered that the trees have access to additional rooting medium along the boundary within the specified fencing alignment equivalent to or greater than the areas of proposed excavation, which directly adjoin the amended RPAs.

The areas of proposed pedestrian/cycleway surfacing within the amended RPAs are specified to be constructed using a bespoke design incorporating a Cellular Confinement System (CCS) and porous wearing surface, built over existing ground levels. It is anticipated that given the CCS will dissipate loading forces the surface is subject to, preventing compaction of the soil below, and continued water and gaseous exchange being allowed through a porous wearing surface, that impact from the new surface will be limited and retained rooting systems beneath will be able to tolerate the new development.

The resilience of these trees to development related impacts is further supported when looking at the existing development of the carpark to the north where the ground at the base of the trees have been unsympathetically covered with a tarmac surfacing that encompasses the base of the stems, (which is also assumed not have incorporated any form of bespoke design or sensitive methodology mitigation as proposed within the current development application), yet the trees has still managed to thrive and continue to grow.

A temporary fencing alignment has been specified to ensure the RPAs within the pedestrian surfacing footprint can be suitable protected prior to the surface being installed after which retained RPA will be protected by either the primary fencing location or the new surfacing which will act as adequate ground protection.

T34 (Oak):
The RPA for T34 has been evenly amended to reflect an equivalent area of its standard RPA projection due to potential root suppression caused by the existing hard surface along Old Wickford Lane.

It should be noted however that both the standard and amended RPA for this tree cross the profile of a boundary ditch which is shown on the topographical survey as being located between the tree and the main development site, including area of proposed impacts; whilst this boundary ditch may have also caused a likely constraint to the spread of root growth westward, limiting the impact from the proposed development encroachments, it is not possible to show a realistic alternative RPA projection due to this exiting landscape feature and as such the amended RPA only considered the hard surfacing of Old Wickford Lane.

The encroachments into the RPA caused by the proposed vehicular surfacing is equivalent to just under 9.6% of the area of the amended RPA and is specified to be conducted with the use of a sensitive methodology to ensure that any impacts to the roots of this tree can be suitably quantified and any required root pruning can be conducted in accordance with best industry practices. It is observed that the tree has additional rooting medium equivalent to the area of proposed excavation available to the north of the RPA.

Revision dates:
It is confirmed that separate, specific revision dates of ACD files are shown in the corresponding section of the respective drawing title box or at the end of each report for each instance of changes made. The main date shown indicates the initial date the file was produced and does not change with each revision to ensure the chronology of the file can be suitably tracked.

Shading:
Whilst the comments received conclude that concerns with shading have been mostly address, the revised Tree protection Plan now includes the projected shading arcs for surveyed trees.

These shading projections indicate that whilst a majority of the proposed development is free of conflict, plots No.56 and No. 64 will be partially shaded; this equates to 36.9% of the outside footprint of Plot No. 54 (resulting in at least x1 full face of the building to be located outside of the shading arc) and 51.2% of the outside footprint for Plot No.64 (resulting in at least x2 full faces of the property to be located outside of the projected shading arc).

It is further considered that given the deciduous nature of the trees adjacent to these plots (all Oak specimens), that more light will penetrate the bare crowns during the darker winter months, and during the hotter summer months, leaf flush will provide additional cooling shade. It is further considered that prior to any purchase, prospective buyers will have ample opportunity to consider the potential impacts of shading alongside the finished plot.

Pressure to prune:

Trees T40 and T41 have pruning works specified to facilitate construction of adjacent plots, this is seen in the form of lower branch pruning to allow a 1.5m offset from the building footprint to allow for scaffolding erection. This pruning would be limited to the lower portions of the crown and required to be no higher than the final height of the plot (less when considering a 1.5m clearance from a slanted roof profile).

The pruning footprint shown on the plan to accommodate this offset is minor and could be considered as Access Facilitation Pruning, which is described at section 3.1 of BS5837:2012 as a "*one-off tree pruning operation, the nature and effects of which are without significant adverse impact on tree physiology or amenity value, which is directly necessary to provide access for operations on site*". It is reasoned that the light pruning required can easily matched into the remaining canopy without adversely affecting the amenity value of the crowns in a significant or unrecoverable way.

It is further reasoned that following completion of the development, whilst further pruning to the trees may be required at intervals having trees in proximity to building, this is not unlike relationships seen between trees and buildings commonly seen across the county and pruning for management or insurance purposes is not considered unreasonable to carry out.

It is further considered that if significant pruning or felling of the trees is a concerns, this could be addressed and enforced through means of statutory protection afforded by a Tree Preservation Order (TPO), which would mean that prior permission would be required from Horsham District Council for any pruning scope submitted, giving opportunity to review and amend any requested pruning works prior to conduction. This would include refusal to fell trees or requiring adequate replacement planting to be agreed and provided if removal of the tree(s) were ever approved.

Pruning and sectional removal from G37 to allow for implementation of garden space affects the understory specimens and scrub only and will not be an ongoing issue following initial sectional removal with the exception of standard management at intervals in accordance with general property maintenance.

Additional:
BS5837:2012 (BS5837) section 5.3.1 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) (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".

However, BS5837 also acknowledges at section 5.1.1 that "*…trees are only one factor requiring consideration*". It is reasoned that points a) and b) from above having been addressed for all proposed encroachments and that an overriding justification is considered to be that the current site layout represents a suitable balance between trees and wider development requirements;

- Houses located offset from the boundary result in surfacing encroachments (which can be mitigated) but prevents construction footprints encroaching within the retained RPAs and the need for crown further pruning, or vegetation clearance and level changes from gardens against the boundary.
- Vehicular surfacing footprints have been informed by required vehicle tracking assessments, changes to which would likely result in an awkward and un-ergonomic layout design.
- Suitable parking and access (including pedestrian links to offsite areas) are requirements of a new development.
- Trees on all boundaries mean that movement and one aspect of developable area within the interior of site would likely result in new or increased impacts to tother trees elsewhere.

It is considered that leaf-litter and tree related detritus are an expectation of living in proximity to trees and would not be fully abated even with greater distance given between the plots and the trees seeing as falling leaves and other material can be carried by the wind for a great distance.

Informal monitoring of trees can be conducted during the development to identify any reasonable indicators of stress or decline, after which consultation with a suitable arboricultural specialist can be undertaken to inform any remediation or mitigation required.

It is reasoned that implementation of the recommended conditions included in the comments received, specifically "*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*", will allow for suitable replacement planting to the satisfaction of HDC to be secured in the event that any trees onsite subsequently decline during the development and ensure that the specified protection and mitigation measures are implemented.

Conclusion and recommendations:

It is anticipated that the use of Cellular Confinement Systems within proposed pedestrian surfaces will mean impacts to roots will be negligible due to retention of roots, dissipation of compactional forces, continued gaseous and water exchange, and additional rooting medium being available directly adjacent to RPAs.

Temporary fencing alignments have been specified to protected RPAs prior to final surface installation. And ground protection/ primary fencing alignment specified for RPA protection following installation.

Root severance required is located to the edges of projected RPAs, limited wider loss of rooting structure within RPAs, and additional rooting medium being available directly adjoining RPAs.

Shading of plots is within a suitable level and sunlight can reach a minimum of x1 full face of each affected plot.

Crown pruning required is justifiable, recoverable and not considered unreasonable. Future pruning could be controlled and enforced through use of a TPO.

As it is acknowledged that the proposed development does have a level of impact to retained trees, though given the above it is considered that these are within a tolerable threshold. However, it is recommended that informal monitoring is conducted during development; this will give reassurance that if any obvious signs of decline are identified, then consultation with the project arboriculturist can be undertaken to inform suitable remediation or mitigation to address the issue.

Given the points raised above, it is considered that additional impacts have been suitably identified and adequate mitigation or protection can be provided to trees shown as retained, such as that changes to the layout are not required as long as the mitigation and design recommendations contained within the latest revisions of the associated Tree Protection Plan and Arboricultural Impact Assessment/method Statement Report (rev B) are implemented.

Henry Pinn *Arb L4 (ABC)*
LANTRA qualified Professional Tree Inspector
Senior Arboricultural Consultant

25th November 2025