



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Ashington, Park Lane, Ashington
DESCRIPTION:	Demolition of existing buildings and erection of 180 dwellings, all-weather sport pitch, sports pavilion and allotments; with associated access, landscaping, open space and infrastructure.
REFERENCE:	DC/23/0406
RECOMMENDATION:	Advice
SUMMARY OF COMMENTS & RECOMMENDATION:	
I cannot support the application in respect of impacts on trees. I recommend refusal on grounds of loss of and detriment to mature trees of significant visual amenity and landscape merit.	
MAIN COMMENTS:	
The revised Tree related information clarifies that the proposed layout is not landscape led and fails to conform with the ethos of ensuring greenfield development is undertaken in accordance with modern design standards for conserving trees and other natural landscape features of merit.	
The loss of mature oak trees that could reasonably be retained by design alterations does not seem an appropriate approach to reasonable greenfield development planning.	
Many of the key remaining mature trees have engineering proposed within their minimum recommended root protection areas where it is recognised within the relevant design standard (BS5837: 2012 – Trees in relation to design, demolition and construction - Recommendations) that the tree and soil structure should take priority. There is no overriding justification for this design failure.	
The design simply does not appropriately take account of the minimum rooting constraints posed by the mature trees of landscape value.	
The somewhat confusing technical note in respect of the access road engineering actually clarifies that it requires significant excavation within the minimum recommended root protection area of the dominant off-site oak tree in the churchyard.	

It does not therefore comply with the relevant design standard. It is not a permeable no-dig road, nor does it meet the recognised design specifications for above ground engineering in this respect.

Additional feedback on specifics of revision D of the submitted Arboricultural Impact Assessment and revision G of the Tree Protection Plan by Keen Consultants:

4.9 – T3 is an A grade oak tree of significant public amenity value due to its species, age, size and position in the adjacent churchyard. The new access road construction and layout is partially within the **minimum** recommended root protection area (RPA) for the tree. The RPA has not been shown as being off-set by the tree surveyor as the current road construction (relatively narrow, shallow concrete drive) is unlikely to have significantly inhibited tree growth. The latest AMS proposes no excavations for the road over 100mm in depth. If viable to be undertaken in accordance with this approach (I recommend that the proposed engineering is assessed by an engineer at this important juncture) then impact upon the rooting of the tree could be minimised with all the proposed utility trenching being installed outside of the RPA of the tree as per previous submissions.

4.13 – T69 is another A grade oak of potential significant public amenity value within a new urban development context. The design has not been amended to remove new hardstanding excavations within its minimum recommended RPA. The design standard is clear that the trees and soil profile should take precedence in a new design. Historic ploughing of the field may have caused the tree to have a slightly deeper rooting profile than may be expected in a non-arable rural site. However, the fact is that installing new hardstanding requires significant compaction, denaturing the spoil profile and preventing gaseous exchange to the roots whether directly impacted upon by the excavations or otherwise. This means not only will all rooting beyond the minimum recommended RPA be lost to the tree but also part of the recognised **minimum** requirement.

4.14 - T19, another of the A grade oak trees as per T69 will have rooting that extends far beyond the minimum recommended RPA. Entirely enclosing this tree with new development that does not fully take account of its **minimum** RPA and having a play area and new hardstanding in close proximity/partially within the RPA will IME likely lead to the tree not surviving for 40 years post development.

The AIA is silent on the construction of a new path access and bridge through the RPA's of mature A and B grade oaks T34 and T36. The TPP states that construction will be undertaken under arboricultural monitoring..... there is no indication of how far the path extends West. It is not shown as being of no-dig construction. Foreseeable impact cannot be fairly assessed from the submission However it clearly does not appear to conform with the recommendations of the design standard. The AIA is clear that where no-dig paths are proposed they are shown on the TPP. I recommend that clarification is sought in this respect.

4.17 – T65 and T66 further A and B grade mature oak trees were shown as requiring removal from revision E/F of the TPP design revisions following the recognition of drainage requirements/implications. A section of the B grade long established Hazel line (T64) is still shown for removal, however the design proposes the oak trees be retained with a tree protection fence erected that does not protect more than approx. 2/3rds of the **minimum** recommended RPA's for the trees. The trees cannot presumably be reasonably protected/retained within the layout due to the ground level alterations required for the drainage within their RPA's. I recommend clarification is sought in this respect.

ANY RECOMMENDED CONDITIONS:	
If minded to recommend for approval either along lines of current revision of scheme or similar, pre-commencement conditions requiring submission of all proposed services installations, and a finalised tree protection plan and detailed AMS and accountable arboricultural site monitoring is recommended.	
NAME:	ANDY CLOUT – ASST. ARBORICULTURAL OFFICER
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	26/03/25