



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Thakeham Tiles Ltd Rock Road Storrington
DESCRIPTION:	Outline application for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage with all matters reserved except for access
REFERENCE:	DC/25/2087
RECOMMENDATION:	Advice / More information/ modification I.e. removal of all development from with the Western Wood next to site access.
2nd response to the Arboricultural Response Note to The Horsham District Council Arboricultural Officer Consultee Response on: Planning application ref: DC/25/2087 in red	Advice
SUMMARY OF COMMENTS & RECOMMENDATION: The Arboricultural Response Note prepared in response to my previous comments' places considerable weight on the outline planning permission granted under application DC/18/2095 in support of the proposed tree removals and the associated loss of Priority Habitat – Lowland Deciduous Woodland. While the previous permission is acknowledged as an important material consideration, it is also relevant to recognise that the current proposal differs from the scheme previously approved. In particular, the present application incorporates the wooded areas adjacent to Rock Road within the development proposals, these areas were not included to the same extent within the earlier consent. As such, the implications for trees and Priority Habitat should be considered in the context of the current scheme and its specific tree related impacts. The application is supported by an Arboricultural Implications Assessment (AIA) prepared in accordance with BS5837:2012. The site contains a mixture of individual trees, groups,	

hedgerows, and woodland. The AIA has recorded 84 individual trees, 14 groups, 2 hedges, and 3 woodland areas.

The overall site layout is, for the most part, arranged in a similar manner to that previously approved under DC/18/2095 on 28/02/2020, except for two additional heavily treed woodland sections located to the east and west of the existing site access within the northern part of the site.

The site is subject to two separate Tree Preservation Orders (TPOs). The first relates to trees within the heavily wooded area in the southern portion of the site, protected under TPO/1298 (served in 2005). The second relates to the wooded area to the east of the existing site access (TPO/0820, served in 1985). The proposed scheme would result in the removal of a significant number of TPO-protected trees.

MAIN COMMENTS

Site observations

Woodland in the Southern Part of the Site

The wooded southern part of the site is located within what was historically an old sand pit. The retained peripheral tree cover is predominantly Scots pine, with some deciduous species including silver birch, oak, and sweet chestnut. Since sand extraction works ceased, the lower central area of the former pit now comprises largely semi-mature to mature scots Pine trees, and more domestic shrubby vegetation such as buddleia and cotoneaster.

The size and maturity of the trees indicate that this area has been wooded for many decades and makes a positive contribution to the rural and wooded character of this part of the parish. To accommodate the proposed residential development in the southern portion of the site, approximately 50% of the trees within this area would require removal. Although it is accepted the wider amenity visual value impact of these removals would be contained with the site due to its topography.

Eastern Wood Next to Site Access

The mature trees within the woodland to the east of the primary access to the Thakeham Tiles site benefit from protection under TPO/0820, an Area Order served on 18/08/1995. Trees present within the designated TPO area at the time the Order was served are protected, whereas trees that have grown since that date are not automatically covered.

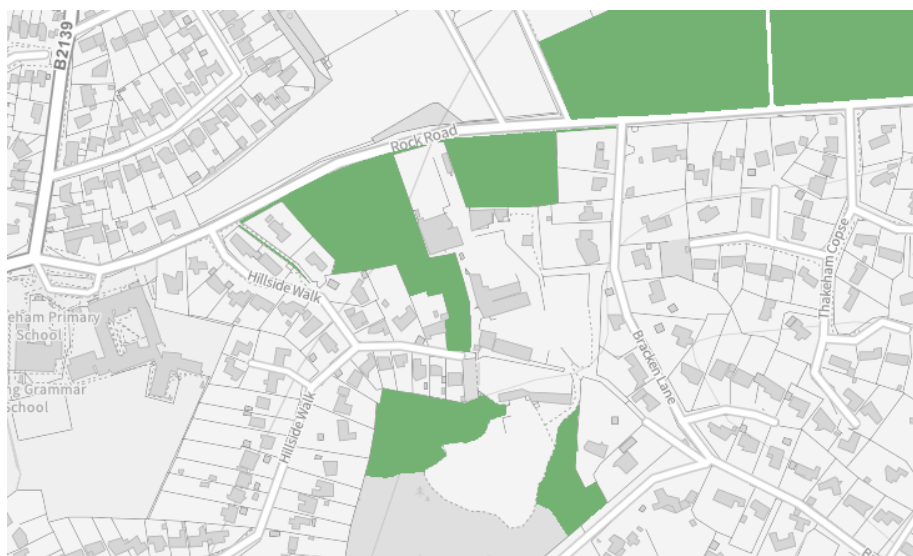
There has been limited recent management within the eastern woodland, and it would likely benefit from a programme of woodland management. The supporting documentation indicates that several trees along the western boundary would require removal to facilitate the proposed access arrangements.

Western Wood Next to Site Access

None of the trees within this area are subject to statutory protection. The woodland predominantly comprises densely spaced semi-mature to mature deciduous trees, with occasional Scots pine.

As with the eastern woodland, the trees have not been subject to recent management and vary in overall quality and condition.

None of the wooded areas affected by the proposal are classified as ancient woodland. However, some sections proposed for removal are mapped on DEFRA MAGIC as Priority Habitat — Lowland Deciduous Woodland. Accordingly, parts of the site constitute habitat of principal importance under Section 41 of the NERC Act 2006 and represent a material planning consideration.



Tree removals

The proposals seek to retain all Category A trees and the majority of higher-quality trees on site. However, the development would result in the removal of 19 individual trees, comprising 6 Category B and 13 Category C specimens. In addition, 5 Category U trees and 6 woodland trees identified as having very limited life expectancy are proposed for removal as part of sound arboricultural management. Four woodland stems are to be retained as standing monoliths to provide ecological benefit.

The scheme also proposes the full removal of seven Category C groups and one Category C hedge (H2). Partial removal is proposed for Group 8 (Category C), Woodland W1 (Category B – inner section, including 43 Category C stems), Woodland W2B (north-west section), and Woodland W3.

The partial loss of Woodland W1 (Category B) is acknowledged. Although primarily composed of Category C stems, it contributes to the wider woodland feel of the area.

Retention of trees along the southern site boundary would help reduce the perceived visual impact of tree loss within the central former pit area and assist in maintaining canopy cover and habitat connectivity.

The woodland on either side of the site entrance along Rock Road forms an established landscape feature that contributes positively to the local wooded character, visual amenity, and ecological value of the area.

The most notable loss of trees, when viewed from the public domain, would occur within the western roadside woodland. The introduction of the SUDS basin and residential development would result in the removal of the majority of trees in this area, significantly diminishing its cohesive landscape value and canopy cover at the site.

The modifications to the layout, which have reduced the extent of proposed tree removal following discussions with Council Officers, are welcomed. It is also noted that the level of tree loss is less than that previously approved under the 2018 application, which is positive.

The comments regarding the Priority Habitat (PH) status and overall condition of the woodland to the west of the site access, together with other areas of PH on the site, are noted. It is acknowledged that parts of the western woodland may have regenerated following the great storm of 1987, in the last century. However, this regeneration has occurred over a period of approximately 38 years, providing significant time for woodland characteristics and habitat functions to re-establish. While the species composition, tree age and condition the woodland may have for the most part evolved as a result of natural regeneration. Historic mapping suggests that the area was well tree 'ed prior to the 1987 storm, with Ordnance Survey mapping revised in 1946 and published in 1952 identifying established tree coverage in this location, this would indicate that, notwithstanding the effects of the 87 storm the site has supported substantial tree cover for a considerable period of time.

Nevertheless, while the loss of part of this woodland to facilitate residential development would be unfortunate, it is recognised that this impact should be considered alongside the site's planning history, including the previous permission which established the principle of residential development within the southern part of the site.

In addition, the proposed retention and enhancement of the woodland to the east of the access is welcomed and would help to safeguard and strengthen a significant element of the site's existing tree cover, ecological interest and landscape character. This approach would provide some long-term benefits through the protection and management of the retained woodland resource.

Furthermore, even with appropriate tree protection measures in place, the long-term retention of remaining trees in the western wood, would be challenging. These specimens have developed within a woodland environment and are generally tall and slender, having grown in mutual shelter. Opening up the woodland would expose retained trees to increased wind loading, potentially increasing the risk of failure during storm events.

When the existing tree cover is assessed against the extent of proposed removals, it is unlikely that meaningful on-site Biodiversity Net Gain can be achieved within the site boundary. As such, a substantial proportion of existing canopy cover and woodland habitat would be permanently lost at the site. **Response noted, and concerns addressed as best as they can be.**

While the quality of trees within the western woodland ranges from good to poor, the woodland as a whole performs an important landscape and habitat function and makes a

positive contribution to the character and ecological value of the immediate and wider area. Consideration should therefore be given to removing all development from the Western Wood next to the site access and retaining and enhancing this woodland feature should be encouraged.

Root Protection Area Observations

The Tree Protection Plan (TPP) lacks clarity as to whether the residential development within the southern section of the site can be accommodated without direct incursion into the Root Protection Areas (RPAs) of retained trees within Group W1B. Level changes and construction within RPAs could materially affect retained trees. Further clarification of finished site levels is required to enable a robust assessment of potential impacts.

Additional RPA incursions are indicated on the eastern side of the site. Some RPAs already contain existing hard surfacing, while others do not. From the TPP and AIA, it is unclear whether the proposed incursions exceed the 20% guideline allowance set out in BS5837:2012. This will need to be confirmed.

The position that detailed consideration of Root Protection Areas (RPAs), site levels and construction impacts can be deferred to the Reserved Matters stage is unfortunate as it leaves a degree of uncertainty as to whether the proposed development can be accommodated without adverse effects on the retained trees based on the information currently available.

While the extent of tree removal proposed to facilitate the development largely reflects that accepted under the previous planning permission, the current scheme relies heavily on the retention of boundary and woodland trees to maintain the site's landscape character and arboricultural amenity. In these circumstances, it is considered reasonable to request an assessment of the likely impacts on the RPAs of the retained trees at this stage. This would help demonstrate that the development can be delivered without compromising tree health, stability or long-term retention.

Future Residence Pressure Observations

Retained trees adjoining the rear gardens of proposed dwellings are likely to be subject to future pressure from residents due to shading, leaf fall, perceived safety concerns, and general maintenance issues. This commonly results in requests for pruning or removal, leading to incremental post-development canopy loss and reduced long-term amenity value.

Appropriate separation distances, careful siting of dwellings, and clear management guidance will be important in minimising future pressure and supporting the sustainable retention of these trees.

While it is acknowledged that the current proposals may follow a broadly similar approach, to the previously approved scheme at the site, it is not unreasonable to expect that development proposals to evolve in response to site-specific constraints, including the presence of existing trees. This is particularly important where mature trees are to be retained near residential development, as the potential implications for both the trees and future occupiers can often be anticipated at this stage. In this regard it is encouraging to see that the retained trees would not be located directly within residential curtilages.

However, given the proximity of retained trees to the proposed dwellings in places, as is currently implied by the supporting site plans and TTP, it is likely that in places such trees would still be subject to foreseeable pressures for pruning or removal over time. As a result, it would be beneficial if a management programme for the retained trees and the newly planted trees within the communal areas of the site outside residential garden areas is provided at a later stage, as has been suggested in the Arboricultural Response Note; please see recommended conditions.

ANY RECOMMENDED CONDITIONS: If minded to approve please use the below conditions.

3.9 Arboricultural Method Statement – Protection details required

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 an Arboricultural Method Statement detailing all trees/hedgerows on site and adjacent to the site to be retained during construction works, and measures to provide for their protection throughout all construction works, has been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented and thereafter carried out at all times strictly in accordance with the agreed details.

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 ensure the successful and satisfactory protection of important trees and hedgerows on the site in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Regulatory Condition: Notwithstanding the approved Arboricultural Method Statement and Tree Protection Plan, no development shall commence until an Arboricultural Supervision and Monitoring Plan has been submitted to and approved in writing by the Local Planning Authority (LPA).

- i. The Plan shall include but not be limited to the name and qualifications of the appointed Arboriculturist, define the scope of supervision (including works within or near Root Protection Areas), and set out a schedule of inspections (pre-commencement, key stages, ongoing monitoring, and post-construction) with procedures for addressing non-compliance.
- ii. The appointed Arboriculturist shall undertake the approved supervision and submit written reports to the LPA within 20 working days of each visit. Development shall be carried out in accordance with the approved Plan and any agreed remedial measures.
- iii. This condition shall only be discharged following completion of the development and submission of satisfactory evidence of monitoring and compliance.

Reason: To ensure the protection and retention of important trees and hedgerows in the interests of amenity, biodiversity, and environmental sustainability, in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Regulatory Condition: Prior to the first occupation of the development, a Tree Management Plan for all retained and newly planted trees within the communal areas of the site shall be submitted to and

approved in writing by the Local Planning Authority. The Plan shall include details of inspection regimes, maintenance operations, management responsibilities and replacement planting. The approved Plan shall thereafter be implemented and maintained for the lifetime of the development.

Reason: As this matter is fundamental to ensuring the successful long-term protection and management of important trees and hedgerows on the site, in accordance with Policy 33 of the Horsham District Planning Framework (2015)

NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	71/02/26