



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Marches Road Marches Warnham
DESCRIPTION:	Approval of details reserved by conditions 3, 4, and 5 to approved application DC/23/1141
REFERENCE:	DISC/26/0216
RECOMMENDATION:	Objection – on Drainage grounds and ancient woodland impacts
SUMMARY OF COMMENTS & RECOMMENDATION: The working methods and tree protection measures detailed within the Arboricultural Method Statement (AMS) prepared by Hellis Solutions Limited, together with the Tree Protection Plan (TPP Ref: TPPMB, May 2026 V1.0), are for the most part considered to satisfy the requirements of BS5837:2012 Trees in Relation to Design, Demolition and Construction.	
MAIN COMMENTS: However, arboricultural concerns are raised with regards the proposed drainage strategy. As the scheme relies on drainage infrastructure passing through the ancient woodland buffer and discharging surface water and treated foul water into a watercourse within the adjacent ancient woodland. The drainage route as proposed has the potential to adversely affect the adjacent ancient woodland and its buffer through soil disturbance, impacts on rooting environments, mycorrhizal networks, ground flora and local hydrology. In addition, the infrastructure would require ongoing inspection, maintenance, repair and potential replacement, creating the potential for repeated disturbance within these sensitive areas. The submitted Drainage Strategy acknowledges that ancient woodland benefits from a 15-metre buffer within which new drainage infrastructure should not be installed. Despite this, the strategy continues to rely on drainage connections and outfalls associated with a watercourse located within the woodland. The report also confirms that the precise location, level and arrangement of the drainage infrastructure remain subject to further survey and review. As such, the drainage strategy as proposed is considered to have the capacity to result in the deterioration of the adjacent ancient woodland and its protective buffer.	

Ancient woodland is an irreplaceable habitat and Policy N6(2) of the NPPF (August 2026), (pervious referred to as paragraph 193©) states that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. Based on the information currently available, neither wholly exceptional reasons nor sufficient evidence to demonstrate the absence of harm have been provided.

This concern is consistent with the findings of the Planning Inspector in Appeal Ref. APP/Z3825/W/25/6002643 (Land east of Rowhook Road, Rowhook, adjacent to Whites Copse Ancient Woodland), where drainage infrastructure within ancient woodland and its buffer was identified as having the potential to adversely affect soils, root systems, ground vegetation, hydrology and the long-term condition of the habitat.

Whilst the AMS provides suitable tree protection measures for the main construction works, neither the AMS nor the Drainage Strategy includes a detailed arboricultural methodology for the installation, maintenance or future replacement of drainage infrastructure within the ancient woodland buffer or woodland itself. Insufficient information has therefore been submitted to demonstrate that the drainage arrangements can be implemented and maintained without causing direct or indirect adverse impacts on the ancient woodland, its buffer or its long-term ecological function.

Accordingly, the proposed drainage strategy cannot be supported on arboricultural ground and ancient woodland impact grounds, and consideration should be given to finding an Alternative way of installing the drainage infrastructure at the site.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	03/09/26