HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Buck Barn Services Worthing Road Horsham
DESCRIPTION:	Removal of drive-through element to existing restaurant and petrol filling station and development of the site to provide a drive-through restaurant, petrol filling station shop, drive-through coffee pod and car wash together with the reconfiguration of car parking and circulation routes, including a revised access slip road from the A24 (northbound) and associated landscaping and ancillary works
REFERENCE:	DC/25/0542
RECOMMENDATION:	Objection / Refusal - recommended on the grounds; The proposed development would result in the loss of a high number of mature trees and established hedgerows of high landscape, and amenity value, which make a significant, and positive contribution to the character and visual quality of the local area. The replacement planting proposed is insufficient to adequately compensate for this loss, particularly in the short to medium term, and would not reinstate the existing landscape character or ecological benefits currently provided by the mature trees at the site. The proposal is therefore contrary to Policy 33 (Development Principles) Horsham District Planning Framework (HDPF) 2015, which Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses.
2nd set of comments in Red	Position unchanged, please see above for recommendation
SUMMARY OF COMMENTS & RECOMMENDATION: The submitted Arboricultural Impact Assessment (AIA), Methods Statement (AMS), and Tree Protection Plan (TPP) present a fair assessment of the tree-related impacts of the development proposals, particularly regarding tree losses and protection measures, should the scheme come to fruition. However, concerns are raised about the number of mature trees proposed for removal, the insufficient replacement proposals, and the wider landscape harm and loss of visual amenity that would arise as a result.	

MAIN COMMENTS:

Initial Observations:

The site is located to the west of the A24, one of the main arterial routes running through the district, due south of the A272, which links Cowfold to the east with Billingshurst to the west. Despite its busy roadside location, the site lies within a predominantly rural countryside setting, except for the parts of the site where the existing buildings are situated, which have a more urban outlook.

Site Layout, Tree Losses:

The site is bordered to the north by a line of off-site WSCC-owned Oaks, which appear to be unaffected by the scheme; this is positive.

The western and southern boundaries are defined by established hedgerows (H2 & H4). The Proposed Landscape Layout (Drawing No. RCo427 / 02) suggests that around 70m of the western hedgerow, listed as H2 in the Arboricultural documents, is proposed to be removed and replaced with a new retaining wall. No mitigation planting appears to be proposed in this area. This aspect of the development would result in a direct loss of a large section of hedgerow bordering open countryside and its replacement with a hard and visually intrusive engineered wall on the edge to the site. In my opinion, this change would diminish the local landscape character, result in a loss of connectivity and green infrastructure, and consequently harm visual amenity and the wider ecological value of the hedge. I also note that the removal of part of H2 does not appear to be referenced in Paragraph 3.2 of the AIA – Tree Removals.

To the west of the main access road and south of the petrol station is a belt of mixed-species trees, ranging in size and age from young and semi-mature to mature specimens. In total, nine individual trees, five tree groups (comprising 40 individual trees and one dense group covering approximately 360m²), and one hedge are indicated for removal to enable the proposed development due to conflicts with the scheme layout.

All trees south of T6 (an Ash) are proposed for removal. These include:

T7: Field Maple

T8–T12: Ash

T13: Oak

T14: Scots Pine

T15: Goat Willow

G3: Hazel

G4: Field Maple

G5: Field Maple, Ash, and Hazel

G6: Scots Pine, Sessile Oak, Norway Maple, Horse Chestnut, and Ash

G7: Blackthorn

40m length of H1: Mixed ornamental hedging

In my opinion, the key arboreal losses relate to:

The 70m section of H2

T11, a mature Ash

G6, a group of around 30 trees. The stated reason for G6's removal is that the group directly conflicts with the proposed access and car parking.

The trees within G6 are readily visible from several public viewpoints, such as when heading north or south on the A24 (Worthing Road), from the north on the A272, and from several viewpoints within the site itself. As such, the trees in G6 make a significant and positive contribution to the character and amenities of the area. Their loss would be highly noticeable and result in significant harm to the area's character and appearance. G6 has been allocated a B1+2 rating using the BS5837 tree survey methodology and has an estimated remaining life expectancy of at least 20 years. However, with selective removal of lower-quality specimens in the group, it is likely that the better trees could be retained, preserving the group's overall integrity and landscape value for much longer than 20 years; Conserns not addressed.

Mitigation Planting:

Mitigation planting is proposed in Paragraph 3.3.1 of the AIA. The proposed landscaping scheme includes a total of 63 new trees to mitigate the losses.

However, studies raise concerns about the effectiveness of such mitigation. A 2020 study by Myerscough College, comparing trees planted in car parks versus peripheral landscaping, found severe growth deficits. Trees in car parks tend to be much smaller, exhibit stunted growth, and are generally less healthy than those planted in parkland or countryside settings. Additionally, research by the Forestry Commission found that 30–50% of newly planted urban trees die within the first 12 months. It is also suggested that over time, survival rates may drop further, potentially reaching 50–80% in suboptimal conditions. In my experience trees in car parks often remain stunted due to:

- Restricted soil volume, Compacted surfaces (e.g., asphalt),
- Poor aftercare (lack of watering, mulching, or maintenance)
- Environmental stress (e.g., heat islands, pollution)

Research suggests that it is likely around 30% of the proposes mitigation tree planting, may well die, and what would remain is unlikely to reach a similar size or condition as that of the tree currently present at the site, which are indicated for removal. As such, I am of the view that any replacement tree, even if of heavy-duty nursery stock, would take many years to reach a similar stature and thus would take many years to reinstate a similar level of visual amenity that the trees at the site afford to the site and wider landscape; Replacement planting would therefore be insufficient to mitigate the harm that I have identified to the character and appearance of the area.

While it is positive to note the retention of H2 along the southern boundary and the amendments to the scheme, which now indicate a larger site boundary with additional proposed scrubland, woodland planting, and some replacement hedging to compensate for the potential loss of sections of H2, I nonetheless remain of the view that the loss of the mature trees within G6, coupled with the additional removals previously highlighted, would result in a significant loss of amenity and cause notable landscape harm to the immediate and wider area. The proposed mitigation planting in the areas where mature trees are indicated for removal does not adequately address this concern.

New woodland planting is welcome, but it should be noted that newly planted trees typically take 5–10 years to establish, focusing first on survival and root development. Full visual and ecological maturity can take 30–50 years. Therefore, although the new planting would replace trees numerically, it would take several decades to reinstate or compensate for the loss of mature trees at the site. Moreover, visual benefits to the public realm would be limited due to the location of the proposed new woodland, which is set back some

distance from the main areas of public activity when assessed against the trees currently present at the site, and those within G6.

Root Protection Area (RPA) Conflicts:

Proposed new hard surfaces will encroach upon the Root Protection Area of T5 by 2.8m², equivalent to 2.5% of the total RPA. However, the proposed works do not meet BS5837 requirements, as no additional protection measures are included, such as, using above-ground, no-dig construction for access where it encroaches on the RPA. Concerns not addressed.

BS5837 – Paragraph 5.3.1 states:

"***The default position should be that structures 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)… 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 to improve the soil environment that is used by the tree for growth."

(Note: BS 5837 defines a "structure" as any manufactured object, such as a building, carriageway, path, wall, service run, or excavated earthwork.)

All other new hard surfacing areas are located outside the RPAs of retained trees.

ANY RECOMMENDED CONDITIONS: If minded to approve without the above concerns addressed, please attach the below condition:

6.8 Arboricultural Method Statement - Implementation

Regulatory Condition: All works shall be executed in full accordance with the submitted Arboricultural Impact Assessment/Method Statement [INSERT - Title, Reference, Date].

Reason: To ensure the successful and satisfactory protection of important trees, shrubs and hedges on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework (2015).

NAME:	Andy Bush Arboricultural Officer
DEPARTMENT:	Strategic Planning (Specialist Team)
DATE:	04/07/25 2nd 31/12/25