



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Rectory Lane Ashington
DESCRIPTION:	Outline Application for redevelopment of the site to provide up to 125 dwellings, access, public open space and associated landscaping, drainage and highways infrastructure with all matters reserved except access
REFERENCE:	DC/26/1186
RECOMMENDATION:	Advice / More info
SUMMARY OF COMMENTS & RECOMMENDATION:	
The application is supported by an Arboricultural Impact Assessment (AIA) prepared by Barton Hyett Associates Ltd. The submitted information demonstrates that the indicative layout has largely been designed around the site's principal arboricultural constraints and seeks to retain the majority of existing trees, including all Category A trees and the identified veteran Oak T25. However, further information is required regarding the protection of retained trees and veteran tree buffers. In particular, a detailed assessment is required to establish whether additional trees should be afforded veteran status and how these trees will be protected during construction and secured for long-term retention.	

MAIN COMMENTS:

Trees Proposed for Removal

The AIA identifies the likely removal of T24, a Category B1 Oak, to facilitate the proposed foul sewer easement. Whilst removal of this healthy mature Oak represents a loss of canopy cover at the site, due to its position in the far north of the site, coupled with the extent of retained tree coverage at the site, I would not be of the view this its removal would give rise to an unacceptable loss of amenity at the site, and any impact could be mitigated by way of replacement planting.

No objection is raised to the removal of T1, a Category U Ash affected by advanced Ash Dieback. Limited hedgerow removals are also proposed and are considered capable of mitigation through replacement planting.

In addition, sections of hedgerows H1, H3, H6, H8, H10 and H15 are proposed for removal to facilitate access arrangements, active travel routes and an internal link road. Whilst some of these hedgerows are categorised B2, the overall extent of removal is limited and appears capable of mitigation through replacement planting and landscape proposals.

The majority of the site's most significant trees are proposed for retention, including numerous Category A Oaks and Oak groups. In particular, T9, T22, T23, T25, T26, T28, T29, T30 and Groups G1, G2, G10, G12, G14 and G15 represent important landscape features that make a significant contribution to the character and amenities of the site and also the wider landscape.

Veteran Trees

It is noted that, in addition to T25 identified within the AIA as a veteran tree, and the accompanying Biodiversity Net Gain (BNG) assessment appears to identify a number of BNG veteran trees.

The NPPF defines a veteran tree as:

"A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species."

Furthermore, Planning Practice Guidance advises that trees may be considered ancient or veteran because of their age, size or condition, and that not all of these characteristics are required for a tree to be classified as ancient or veteran.

The relevant Planning Practice Guidance (PPG) wording on the definition of ancient and veteran trees is:

"Trees become ancient or veteran because of their age, size or condition. Not all of these characteristics are needed for a tree to be considered ancient or veteran, as the characteristics will vary from species to species."

Having reviewed the submitted tree survey coupled with on-site observations, it is evident that several trees, including T19 (Cat A3), T21 (Cat A3), T22 (Cat A1), display features commonly associated with veteran trees, including cavities, decay features, deadwood, fungal associations and other notable habitat features.

T22 appears to be the largest tree on the site, with a DBH of 1540mm, suggesting it is both old and large for the species, basal hollowing, cavities and wildlife habitat were also noted during the site visit. Whilst it displays limited crown retrenchment, neither does T25, which has been identified within the AIA as a veteran tree. As such, based on the submitted information and observations made during the site visit, T22 appears likely to meet the NPPF definition of a veteran tree.

In respect of trees T19 and T21 it is noted that both trees have been recorded as category A3 trees, highlighting their habitat value. A3 trees are noted as being "*Trees, groups or woodlands of significant conservation, historical, commemorative or other value (e, veteran trees or wood-pasture)*". It is acknowledged that the DBH's of T19 and T21 are fairly modest at 940mm, for T19 and 1030mm, for T21, when assessed against that of T22. Nevertheless, when assessed in accordance with the BNG assessment and the PPG both trees appear likely to meet the threshold for classification as veteran trees.

A detailed veteran tree assessment has not been submitted with the application; therefore, a further assessment is required to establish whether any additional trees on the site should be afforded veteran status. Suppose additional veteran trees are identified, this will need to influence the final layout, drainage infrastructure, utility routing and the extent of any required buffer areas.

Clarification should also be provided as to how the scheme will secure the long-term retention and protection of the BNG veteran trees throughout the development and post development; preferably through the use of larger development-free buffer zones, if deliverable.

Due to the extent of the open space in the north of the site, it is likely that any amendments to the areas of development to accommodate additional veteran tree buffer zones could be delivered, without the loss of any units, subject to an appropriate design.

Root Protection Areas and Retained Trees

Whilst the submitted documents appear to demonstrate a broad intention to avoid the RPAs of retained trees, the AIA acknowledges that detailed drainage proposals, road construction, utility routing and ground level changes have not yet been finalised. Accordingly, it cannot be conclusively determined at this stage that all retained RPAs will remain unaffected.

Consideration should be given to detailed foul and surface water drainage routes, Attenuation basin construction methodologies, Utility corridors, ground level changes associated with roads and development parcels, and construction access requirements. These elements should be demonstrated at Reserved Matters stage to avoid direct and indirect impacts upon retained tree rooting environments.

Furthermore, whilst the submitted AIA relies upon the standard circular RPAs derived in accordance with BS5837:2012, it should be recognised that these represent a design tool rather than a direct representation of actual root distribution. BS5837:2012 paragraph

4.6.2 specifically advises that where pre-existing site conditions or other factors indicate rooting has occurred asymmetrically, a polygon of equivalent area should be produced which better reflects the likely root distribution. The Standard further advises that modifications to RPA shape should take account of factors including topography, drainage, soil conditions and existing constraints to rooting, such as roads.

Several retained trees are located adjacent to Rectory Lane, where existing road construction and underground sewer and gas infrastructure are likely to have constrained root development on the highway side. Consequently, the principal rooting areas are likely to extend further into the development site, and the potential impact of development may therefore be greater than suggested by the simple circular RPA plots shown on the submitted drawings.

In addition, it is noted that the site has historically been managed for arable agriculture, with regular cultivation and crop rotation evident. However, ploughing depths are typically limited to approximately 300-400mm, whereas mature tree rooting commonly occupies the upper 1.0-1.5m of soil. Whilst cultivation may influence superficial rooting, it is unlikely to materially constrain the overall lateral extent of the rooting system. It should therefore be recognised that roots are likely to extend well beyond the calculated RPAs, which BS 5837 defines as the minimum area necessary to sustain a tree, rather than the absolute extent of rooting. Consequently, opportunities to exceed the minimum RPA should be pursued wherever practicable to provide adequate working space, stronger long-term protection and appropriate separation between retained tree belts and the proposed built form.

Given the outline nature of the application and the lack of detailed information relating to drainage, utilities, road construction and levels, further consideration should be given at Reserved Matters stage to actual root distribution where development is proposed in close proximity to retained trees. This may require site-specific arboricultural assessment and justification to demonstrate that the proposed development would not adversely impact the long-term health, stability and retention of these important landscape features.

Subject to further assessment of potential veteran trees and confirmation that drainage, utility infrastructure and construction activities can be accommodated without adverse impacts on retained trees, no overriding arboricultural constraint to the development has currently been identified.

Tree Protection Measures

The AIA report confirms that a future Reserved Matters application will need to be supported by a detailed AIA, AMS, and TPP addressing the final layout, drainage infrastructure, ground levels and construction methodologies. This approach is considered appropriate given the outline nature of the current application.

ANY RECOMMENDED CONDITIONS: None at this stage

NAME:	Andy Bush Arboricultural Officer
DEPARTMENT:	Specialist team Strategic Planning
DATE:	24/09/26