



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	RM Area 11 (Moathouse) Moathouse Farm Rusper Road Horsham
DESCRIPTION:	Application for approval of Reserved Matters (layout, scale, appearance, means of internal access and landscaping) pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for RM Area 11 comprising demolition of existing garage and outbuilding and provision of 11 residential (C3) units, including single storey side extension to existing dwelling and conversion into 2 residential units and car and cycle parking, drainage, internal roads, landscaping and associated infrastructure.
REFERENCE:	DC/26/1323
RECOMMENDATION:	Advice more info
SUMMARY OF COMMENTS & RECOMMENDATION:	
Please note that these comments are based on a desk-based review of the submitted Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan. Whilst I am familiar with the wider North Horsham development, no site visit has been undertaken as part of this consultation response. The proposal seeks to retain the majority of existing trees, with only two low-quality Category C specimens (T251a and T251b) identified for removal. Whilst the principle of development appears broadly acceptable from an arboricultural perspective, further information and justification are required before the proposal can be fully supported. In particular, clarification should be provided regarding the necessity of development within retained tree RPAs and the long-term sustainability of the relationship between retained trees and proposed dwellings, notably T256 and Plot 11, the eastern boundary tree belt and Plots 3-5, and T254 in relation to Plot 8.	

MAIN COMMENTS:

Tree Removal's

The proposals require the removal of T251a (Goat Willow) and T251b (Blackthorn), both categorised as low-quality Category C trees. No Category A or B trees are identified for removal. No concerns are raised with the proposed removals, subject to appropriate compensation planting.

Root protection Area incursions

The RPAs of several trees growing adjacent to the moat, including T253 and T256, have been modified and fall further into the site, this appears to have been done on the basis that the water-filled moat acts as a barrier to root development; this approach is welcome.

The principal development-related RPA incursions comprise the construction of no-dig parking bays within the RPA of T253 Ash, the installation of a bin store and cycle store within the RPA of T256 Oak, and new fencing within the RPAs of T254 Maple and T256 Oak. All other retained trees appear to have been avoided by the proposed development.

Whilst the proposed incursions are relatively limited and are supported by no-dig construction methodologies, BS5837:2012 makes clear that development within RPAs should be avoided wherever practicable. The submitted AIA largely focuses on mitigation measures and the extent of the incursions, rather than demonstrating why the proposed development cannot reasonably be arranged to avoid them. Whilst some justification is provided, particularly in respect of T253 where the encroachment is stated to affect approximately 7.8% of the rooting area, further clarification should be provided as to why the incursions are necessary and why alternative layouts have not been pursued.

Site layout observations

Despite the presence of the moat, the relationship between the eastern boundary tree belt and Plots 3, 4 and 5 does not appear to represent a sustainable relationship between retained off-site trees and future occupants, as envisaged by BS5837:2012. The west-facing rear gardens are likely to experience significant shading throughout much of the morning period, with Plot 5 also affected by T260 Ash later in the day. As such, the proposal is likely to give rise to foreseeable future pressure for pruning or selective removals with the aim of increasing natural light penetration in the main garden areas of the affected dwellings.

The relationship between Plot 11 and retained T256 Oak does not represent a sustainable long-term relationship. The tree's RPA extends across a substantial proportion of the rear garden, increasing the potential for indirect impacts arising from future landscaping, domestic structures and general garden use. In addition, the tree's size and proximity are likely to result in shading and give rise to foreseeable pressure for pruning works.

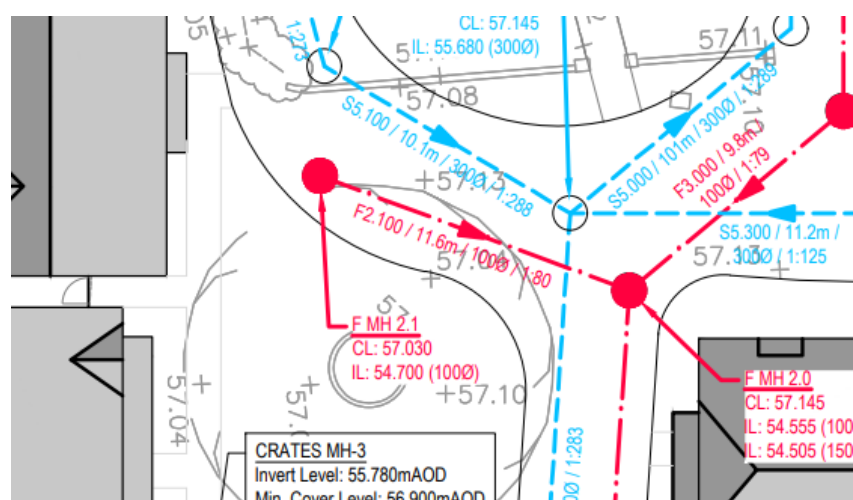
The tree survey advises T256 as being in only fair physiological condition, with canopy decline, deadwood and upper crown dieback noted, and the photographs provided within the submission appear to support these observations. This further reinforces concerns regarding the suitability of the relationship between the proposed dwelling and retained tree, as future occupiers are likely to have concerns regarding the tree's condition and ongoing management requirements.

Likewise, the relationship between Plot 8 and adjacent retained Field Maple T254 is likely to give rise to foreseeable requests for pruning from future occupiers, due to the tree's close proximity to the plot and its influence over the proposed amenity space. This concern arises from the likelihood of pressure for management works to address shading, overhang and perceived nuisance as the tree continues to mature.

With regard to T253 (common ash), the survey findings are noted, including the basal decay cavity associated with the removal of former co-dominant stems. Whilst the proposed RPA incursions appear to fall below the commonly referenced 20% threshold, consideration should be given to the tree's condition and future retention potential.

Given the presence of a basal decay cavity and the classification of the tree within Ash Health Class 1, further consideration should be given to the long-term suitability of retaining T253 where development and parking are proposed within its rooting environment. Whilst the encroachment is stated to be below BS5837 thresholds, the tree's condition and likely future management requirements are material considerations when assessing the acceptability of development in close proximity to this tree.

The submitted drainage layout does not appear to give rise to any significant arboricultural impacts; however, clarification is required regarding the drainage apparatus proposed in close proximity to T250, as shown in drawing MOW-GLA-MH-PH1-1201, which appears to indicate drainage infrastructure within RPA. Please see below.



ANY RECOMMENDED CONDITIONS: None at this stage	
NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	24/09/26

