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Sent: 01 August 2024 09:05:05 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Cc: "Stephanie.Bryant" <Stephanie.Bryant@horsham.gov.uk>; "Emma.Parkes" <Emma.Parkes@horsham.gov.uk>
Subject: DC/24/0462 - Planning Committee (North) 6th August 2024
Categories: Consultations

Good morning

Please could Rudgwick Parish Councils observations, detailed below, be noted prior to the Planning Committee (North) meeting on 6th August 2024.

DC/24/0462
Rudgwick Parish Council (RPC) thanks the officers for the very careful consideration of the points raised in the previously submitted RPC Holding Objection and providing responses within the Committee Report to concerns raised.

Retained Trees
RPC believes, however, that further clarity is required concerning statements within that report about building within the RPA of trees to be retained on site. The Arboricultural Impact Assessment (AIA) submitted by the applicant states that the great majority of site works will take place outside the RPA of retained trees. The officers report however states (at Para 1.4 & 6.24) the contrary i.e. that the majority of works would take place within the RPAs.

If the officer's statements were the case, then RPC would have an extremely strong objection to lodge, with reference to RPAs under BS 5837, as outlined by the HDC Arboricultural Officer in February 2020 (when commenting on application DC/20/0209):

'The RPA of a tree is defined under the BS as "the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority". It also advises that "the default position should be that structures are located outside the RPA's of trees to be retained". The BS indeed allows the possibility of some measure of construction within an RPA, using a technical solution; but only where there is an "overriding justification for construction". Clearly, the importance of the tree, its age and its ability to withstand root severance, as adjudged by a competent arboriculturalist, must be taken into account.'

Hopefully the committee report can be adjusted to confirm that the reality aligns with the statement within the AIA and therefore the proposed development will accord with the sound principles noted above.

Trees Removed/Replaced

Extracts from Committee Report:
6.20 To compensate for the proposed loss of existing trees, the AIA proposes new tree planting
6.21 The Council's Arboriculturist further confirms that they do not object to this tree's removal and replacement, and that its removal and replacement would be of a longer term landscape benefit.
6.22 Officers are also satisfied that the proposed loss of category C trees predominately in the centre of the site will be mitigated by new planting on site of higher quality, native species trees. Officers consider that the detail of the new planting can be secured through planning condition. Officers are therefore satisfied that the proposal accords with Policy 31 of the HDPF.
From the AIA paragraph 1.4.3 "New planting is proposed to compensate for unavoidable tree losses - see accompanying material for details".
Where is the accompanying material that the AIA refers to? There appears to be nothing on file.
Proposed condition 9 is a general condition that will not necessarily meet the above e.g. will it ensure that T19 is replaced? Will it specifically ensure that RNP17.2 is complied with i.e. trees lost are replaced (perhaps even offsite - condition 9 does not appear to cater for that) and with a minimum specification?
Surely this general condition should be supplemented with a further requirement to, for example, ensure that the (subsequent) landscaping plan satisfies RNP17.2 in respect of all trees listed in AIA Appendix B for removal.
Or perhaps, a landscaping plan should have been submitted now, as part of this application, to ensure that all of the above would be complied with (e.g. higher quality, native species trees)?
As there is insufficient certainty that lost trees will be adequately replaced in accordance with policy, RPC will maintain an Objection until such time as appropriate landscape plans are submitted, OR, the landscaping planning conditions are made significantly more detailed to ensure policy compliance, especially with RNP 17.2.

With kind regards
Sarah

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