



Arboricultural Response Note to The
Horsham District Council Arboricultural Officer Consultee Response on:
Planning application ref: DC/25/2087

Thakeham Tiles Ltd Rock Road Storrington

Outline application for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage with all matters reserved except for access

Prepared on
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Introduction:

This note provides a formal response to the Horsham District Council (HDC) Arboricultural Officer Consultation Response (AOCR) dated 17th February 2026 on the Council's website with regard to planning application DC/25/2087.

For ease of reference, the relevant AOCR comments (where we believe a response is required) are copied below and *italicised* with our response beneath in green, bold text.

The AOCR confirms that the Site does not sit within a conservation area, and there are two Tree Preservation Orders (TPOs) currently in place on site that protect trees within those areas defined by the orders.

SUMMARY OF COMMENTS & RECOMMENDATION:

The application is supported by an Arboricultural Implications Assessment (AIA) prepared in accordance with BS5837:2012. The site contains a mixture of individual trees, groups, hedgerows, and woodland. The AIA has recorded 84 individual trees, 14 groups, 2 hedges, and 3 woodland areas.

The overall site layout is, for the most part, arranged in a similar manner to that previously approved under DC/18/2095 on 28/02/2020, except for two additional heavily treed woodland sections located to the east and west of the existing site access within the northern part of the site.

The site is subject to two separate Tree Preservation Orders (TPOs). The first relates to trees within the heavily wooded area in the southern portion of the site, protected under TPO/1298 (served in 2005). The second relates to the wooded area to the east of the existing site access (TPO/0820, served in 1985). The proposed scheme would result in the removal of a significant number of TPO-protected trees.

Response:

The number of trees protected by a TPO proposed for removal for this application is six more than the previously consented outline application DC/18/2095, with these additional trees on the edge of the western woodland where their removal will not make a significant visual difference to the woodland edge.

The trees that are protected by a TPO were protected before the previous application and the removal of the trees (with the exception of the noted trees above) was consented by the Council.

MAIN COMMENTS

Site observations

Woodland in the Southern Part of the Site

The wooded southern part of the site is located within what was historically an old sand pit. The retained peripheral tree cover is predominantly Scots pine, with some deciduous species including silver birch, oak, and sweet chestnut. Since sand extraction works ceased, the lower central area of the former pit now comprises largely semi-mature to mature Scots Pine trees, and more domestic shrubby vegetation such as buddleia and cotoneaster.

The size and maturity of the trees indicate that this area has been wooded for many decades and makes a positive contribution to the rural and wooded character of this part of the parish. To accommodate the proposed residential development in the southern portion of the site, approximately 50% of the trees within this area would require removal.

Although it is accepted the wider amenity visual value impact of these removals would be contained within the site due to its topography.

Response:

The number of trees protected by a TPO proposed for removal for the southern side of the site is the same as the previously consented scheme.

Eastern Wood Next to Site Access

The mature trees within the woodland to the east of the primary access to the Thakeham Tiles site benefit from protection under TPO/0820, an Area Order served on 18/08/1995. Trees present within the designated TPO area at the time the Order was served are protected, whereas trees that have grown since that date are not automatically covered.

There has been limited recent management within the eastern woodland, and it would likely benefit from a programme of woodland management. The supporting documentation indicates that several trees along the western boundary would require removal to facilitate the proposed access arrangements.

Response:

The number of trees protected by a TPO removed for this application is six more than the previously consented outline application DC/18/2095 within this eastern woodland parcel. The loss of these trees provides for a site access that meets the requirements and demand of highways requirements whilst also meeting the development layout requirements. It is our view that the removal of these six trees will not significantly alter the visual aspect of the woodland with the trees that are retained behind them.

The landscape and ecology proposals along with arboricultural input will ensure that the overall woodland here (as well as the rest of the site) is managed and improved with a long-term vision to ensure long term tree cover that matures with the site.

Western Wood Next to Site Access

None of the trees within this area are subject to statutory protection. The woodland predominantly comprises densely spaced semi-mature to mature deciduous trees, with occasional Scots pine.

As with the eastern woodland, the trees have not been subject to recent management and vary in overall quality and condition.

None of the wooded areas affected by the proposal are classified as ancient woodland. However, some sections proposed for removal are mapped on DEFRA MAGIC as Priority Habitat — Lowland Deciduous Woodland. Accordingly, parts of the site constitute habitat of

principal importance under Section 41 of the NERC Act 2006 and represent a material planning consideration.

Response:

The established and mature trees are located around the perimeter of the site that the proposal seeks to retain, and these are the higher quality trees. The more central area of the site is now formed by semi mature natural regeneration mostly of a multi stemmed nature following significant tree loss in the 1987 storms and in our view are poor to low quality. This, together with the tree survey, ecology assessments and landscape appraisals, provide justifications and reasons why this area is not considered to be Priority Habitat now.

Tree removals

The proposals seek to retain all Category A trees and the majority of higher-quality trees on site. However, the development would result in the removal of 19 individual trees, comprising 6 Category B and 13 Category C specimens. In addition, 5 Category U trees and 6 woodland trees identified as having very limited life expectancy are proposed for removal as part of sound arboricultural management. Four woodland stems are to be retained as standing monoliths to provide ecological benefit.

The scheme also proposes the full removal of seven Category C groups and one Category C hedge (H2). Partial removal is proposed for Group 8 (Category C), Woodland W1 (Category B – inner section, including 43 Category C stems), Woodland W2B (north-west section), and Woodland W3.

The partial loss of Woodland W1 (Category B) is acknowledged. Although primarily composed of Category C stems, it contributes to the wider woodland feel of the area.

Retention of trees along the southern site boundary would help reduce the perceived visual impact of tree loss within the central former pit area and assist in maintaining canopy cover and habitat connectivity.

The woodland on either side of the site entrance along Rock Road forms an established landscape feature that contributes positively to the local wooded character, visual amenity, and ecological value of the area.

The most notable loss of trees, when viewed from the public domain, would occur within the western roadside woodland. The introduction of the SUDS basin and residential development would result in the removal of the majority of trees in this area, significantly diminishing its cohesive landscape value and canopy cover at the site.

Furthermore, even with appropriate tree protection measures in place, the long-term retention of remaining trees in the western wood, would be challenging. These specimens have developed within a woodland environment and are generally tall and slender, having grown in mutual shelter. Opening up the woodland would expose retained trees to increased wind loading, potentially increasing the risk of failure during storm events.

When the existing tree cover is assessed against the extent of proposed removals, it is unlikely that meaningful on-site Biodiversity Net Gain can be achieved within the site boundary. As

such, a substantial proportion of existing canopy cover and woodland habitat would be permanently lost at the site.

While the quality of trees within the western woodland ranges from good to poor, the woodland as a whole performs an important landscape and habitat function and makes a positive contribution to the character and ecological value of the immediate and wider area. Consideration should therefore be given to removing all development from the Western Wood next to the site access and retaining and enhancing this woodland feature should be encouraged.

Response:

With the slight modifications and changes to the layout that have been informed by Council Officer feedback, the tree removal is now two individual trees and one group less than previously consented.

The tree loss in W1 will be the same as the previously approved scheme and although the orientation of some dwellings and road alignments has been changed, the overall footprint of the proposals has not changed so there is not further impact.

The cohesive nature of the western woodland was lost in the storms in 1987. The strong tree line along Rock Road is retained and enhanced which will continue to provide the tree scape as you manoeuvre along the highway. The retained trees have survived the loss of trees from the storm for forty years and stand taller than the trees to be removed; in our opinion the trees are not at risk of failing due to exposure.

Ecological, landscape and BNG assessments have been completed and provided for the proposal by the appropriate consultants and address the concerns over the 'important landscape and habitat function and makes a positive contribution to the character and ecological value of the immediate and wider area'.

The proposal will be assessed and judged with all planning matters considered with a decision made on planning balance.

Root Protection Area Observations

The Tree Protection Plan (TPP) lacks clarity as to whether the residential development within the southern section of the site can be accommodated without direct incursion into the Root Protection Areas (RPAs) of retained trees within Group W1B. Level changes and construction within RPAs could materially affect retained trees. Further clarification of finished site levels is required to enable a robust assessment of potential impacts.

Additional RPA incursions are indicated on the eastern side of the site. Some RPAs already contain existing hard surfacing, while others do not. From the TPP and AIA, it is unclear whether the proposed incursions exceed the 20% guideline allowance set out in BS5837:2012. This will need to be confirmed.

Response:

The level of information available overall is similar, if not improved, compared to the approved outline application, however the plan has been updated to include the positions of trunks from a topographical plan that was the basis of the previous application.

Full and detailed assessments will be provided as part of a Reserved Matters application. This will cover, but not be limited to, proposed finish levels of gardens, footpaths and roads, construction design and installation techniques for retaining walls where required to minimise the extent of ground disturbance and impact on trees beyond the footprint of built form and residential gardens. Site level details will be submitted in support of a future Reserved Matters application to demonstrate that the proposed development results in no adverse effects on the trees to be retained.

Architectural sections prepared as additional information and to illustrate the level changes on site form part of this current application. A more detailed review of proposed levels would be carried out at later stage, in coordination with the Architects and the Arboricultural Consultants.

The proposals have been amended on the eastern side to further improve the setting for the retained trees on the eastern side of the site and this reduces and even removes the extent of hard standing in rooting areas. The potential impact, or lack of, will be confirmed via submitted details for the Reserved Matters application with a more detailed proposed site plan that will aid in more accurate and detailed arboricultural assessments.

Future Residence Pressure Observations

Retained trees adjoining the rear gardens of proposed dwellings are likely to be subject to future pressure from residents due to shading, leaf fall, perceived safety concerns, and general maintenance issues. This commonly results in requests for pruning or removal, leading to incremental post-development canopy loss and reduced long-term amenity value.

Appropriate separation distances, careful siting of dwellings, and clear management guidance will be important in minimising future pressure and supporting the sustainable retention of these trees.

Response:

The site benefitted from previous outline planning permission for a very similar form of development in 2020 which must have considered these concerns at that time and in our opinion the proposals have not significantly changed to alter the positive planning decision. There are no trees to be retained in private gardens, therefore residents will not be able to remove trees without consent from a third party as well the Council where trees are afforded legal protection.

Please refer to the revised site plan with the plot boundaries now excluding the higher quality trees along Rock Road to ensure their long-term retention, this continues across

the remainder of the site. Dwellings are located and positioned to account for the topography of the site, requirements of the various planning constraints and requirements along with the perceived concerns of trees. Largely the plots and positions of dwellings remain the same as the previously approved outline scheme and therefore the impacts have largely already been accepted in planning terms.

A management programme for the trees can be provided to demonstrate that the trees are being managed across the site in conjunction with landscaping and ecology needs and this, if adopted as part of a planning consent and the landowner/management company will provide assurances to residents, neighbours and the Council that the trees are being maintained sustainability to reduce the potential perceived concerns.



Appendix

CB1 Qualifications and Experience





The Professional Arboricultural Consultancy

Qualifications of Stefan Rose Principal Consultant

Stefan Rose *BSc (Hons), TechCert (Arbor.A), TechArbor.A*, joined CBA Trees in 1998 as a junior surveyor and having gained extensive knowledge and a wealth of experience over the years including Professional Tree Inspectors Certification (LANTRA), has progressed to Principal Consultant. He has considerable experience in working as a locum for Local Authorities, assessing new and extant Tree Preservation Orders, and continues to work on a number of major development projects nationwide.

As our Principal Consultant Stefan undertakes a full range of arboricultural services from health and safety audits to BS5837:2012 tree surveys, providing expert advice and guidance on initial feasibility site assessments to full scale planning applications. He is accomplished at producing implication assessments and method statements for the submission of planning applications, working with both individual home owners and within multi-disciplinary teams to achieve successful arboricultural outcomes.