HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Station Road Warnham
DESCRIPTION:	Outline application for the erection of approximately 24 residential dwellings, with all matters reserved except for access.
REFERENCE:	DC/26/0585
RECOMMENDATION:	Advice / modification
2nd response in Red	Advice / more info
3rd response in green	Advice / More Info
4th response in Blue	Advice / More info
5th response in orange	Advice / More info

SUMMARY OF COMMENTS & RECOMMENDATION:

The application is supported by an Arboricultural Constraints Survey, Impact Assessment, Protection Plan, and Method Statement prepared by Ecosurv Ecological Consultancies.

The application site contains a mix of individual trees, groups, and woodland edge vegetation typical of a semi-rural setting. The Arboricultural Report has been undertaken broadly in accordance with BS 5837:2012 and identifies eleven individual trees, seven groups, and one hedgerow.

The Arboricultural Report advises that the majority of trees within the central parts of the site are proposed for removal to facilitate development, with only a limited number retained, primarily around the periphery of the area of the proposed development. There are also instances where the site layout creates conflicts with the Root Protection Areas (RPAs) of retained trees, such as Tree T8.

Further to the amendments to Units B11 and B12, my previous concerns regarding encroachment into the RPA of retained tree T8 have been addressed.

However, insufficient information has been provided regarding the final drainage design. The route, construction methodology and excavation requirements associated with the proposed drainage infrastructure and sewer connection remain unclear. As such, it is challenging to fully assess the arboricultural impact of the proposal and determine whether the proposed drainage works can be accommodated without adverse effects on retained trees and the adjacent Priority Habitat Woodland.

MAIN COMMENTS:

Tree Removals

The proposal includes the removal of serval individual trees namely T1, T2, T3, T4, T5, T6, T7, T10 and T11, Groups G2 and G3, and Hedgerow H1.

Although the number of trees proposed for removal is relatively high, the majority of the trees are of limited arboricultural quality. They are categorised as Category C or U, meaning they either have limited arboricultural value when assessed as individual specimens or are in poor condition. This includes, for example, ash trees displaying symptoms consistent with Ash Dieback, a chronic fungal disease in Europe characterised by leaf loss and crown dieback in infected trees.

However, the cumulative loss of tree cover at the site would be noticeable, regardless of the quality of the trees to be removed. As such, a comprehensive landscaping and replanting scheme will be required to mitigate canopy loss and to ensure the long-term amenity value of the site.

Tree Surgery and Arboricultural Works observations

The report identifies the need for access facilitation pruning, potential ongoing pruning where built form encroaches on the canopy, and root pruning during construction. However, it is unclear which specific trees require work and what the extent of such works would be. This lack of detail could lead to misinterpretation during implementation. It would therefore be helpful if a detailed schedule of tree works were submitted.

Root Protection Areas (RPA) Observations

The RPA is defined as the minimum area required to maintain tree viability and should remain undisturbed to protect rooting volume, soil structure, and root function. BS 5837:2012 – Trees in relation to design, demolition and construction advises at paragraph 5.3.1 that the default position should be for structures to be 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 or trees. Where operations within the RPA are demonstrated as being unavoidable, the development proposals need to demonstrate that the impacted trees can remain viable and that the area lost to encroachment can be compensated for elsewhere, contiguous with the RPA, and propose mitigation measures to improve the soil environment used by the tree for growth; this has not currently been demonstrated

The proposed development includes several instances where incursions into RPAs are proposed, including construction within the RPA of T8, new hard surfacing within the RPA of Group G1, and soft landscaping within the RPAs of Groups G5, G6 and G7.

However, due to the way that the information has been present within the Arb report and within the Tree Protection Plan it is not possible to ascertain the full extent of the RPA incursions as no figure set out as a percentage of the total area covered by the incursion in the RPA has been provided.

Furthermore, no overriding justification has been provided for development within the RPA of Oak T8, or the group G1. Given the greenfield nature of the site, where layout flexibility is greater, the threshold for such justification is high. Development within RPAs should only be considered where it can be clearly demonstrated to be unavoidable and fully compliant with BS 5837 principles; at present, this has not been demonstrated.

Whilst the amendments to the Arboricultural Constraints Survey, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement partially address the previous concerns raised regarding Root Protection Area (RPA) incursions, the submitted information primarily demonstrates how works could be undertaken within RPAs whilst seeking to minimise impacts on retained trees.

However, the revised documents do not appear to provide sufficient justification for why development within the RPAs of retained trees, particularly T8, is necessary in the first instance. Whilst BS 5837 allows for carefully designed construction within RPAs in certain circumstances, the principle of the standard is to avoid such impacts where practicable through site layout and design.

As raised previously, no overriding justification has been provided to demonstrate that RPA encroachment is unavoidable or has been minimised as far as possible. As such, whilst the proposed mitigation measures may reduce potential impacts, it is not considered that sufficient evidence has been provided to demonstrate that the proposals are fully aligned with the core principles of BS 5837. Any development within the RPAs of retained trees should be supported by robust justification demonstrating that avoidance has been fully considered.

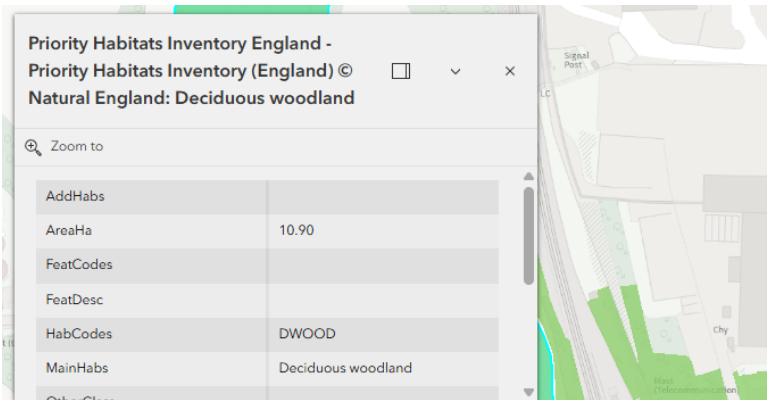
Consideration should therefore be given to relocating Units 12 and 13/14 further south to establish a more appropriate tree-to-building relationship with the Oak T8, as the current layout not only results in development in the RPA of T8, it also doesn't account for any working space during the build out stages to allow for the units in question without further compromising the RPA.

Site Layout Observations

The proposed layout places-built development and private amenity spaces in close proximity to retained trees, particularly T8, T9 and Groups G4 and G7.

The layout as proposed would create foreseeable tree to build and post development conflicts implying that there is the capacity for future requests for excessive pruning or tree removal, incremental damage to RPAs through domestic use, and amenity conflicts arising from shading, debris, and perceived nuisance.

Further to my previous comments, it is noted that the site adjoins an area identified on Natural England's Priority Habitats Inventory as Deciduous Woodland, a Habitat of Principal Importance under Section 41 of the NERC Act 2006. As such, any proposals should avoid direct or indirect impacts on the woodland, including those arising from changes in drainage patterns, ground disturbance or root damage.



The submitted Drainage Technical Note proposes a surface water outfall through the woodland, however the final alignment and construction methodology have yet to be determined. Whilst the submitted arboricultural documents provide general advice regarding the installation of drainage infrastructure in proximity to retained trees, they do not specifically assess the proposed outfall route through the woodland or its potential effects on woodland soils, retained root systems and site hydrology.

As such, insufficient information has been provided regarding the routing, construction methodology and extent of disturbance associated with the proposed outfall, it is not currently possible to fully assess the implications of the drainage proposals on the adjacent woodland habitat. Further information should therefore be provided to demonstrate that the drainage scheme can be implemented without adverse effects on the woodland resource.

The submitted Surface Water Drainage Technical Note: Station Road, Warnham, RH12 3SR (Job No. P6420J3142, September 2026), together with the revised arboricultural information, provides further consideration of the constraints associated with routing a surface water outfall through the woodland, including potential RPA incursions, woodland habitat impacts and the likely need for specialist construction techniques. However, neither submission includes a detailed assessment of a specific outfall alignment or a confirmed construction methodology. As a result, the extent of potential disturbance to retained root systems, woodland soils and site hydrology cannot be fully assessed.

ANY RECOMMENDED CONDITIONS: N/A

NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	01/06/26 3rd response 21/09/26 4th response 07/10/26 5th response 28/10/26