AWDM/0593/26 – Land South of Lyne House, 20 Links Road, Worthing

Applicant's Response to the Arboricultural Officer's Comments Dated 9 October 2026

Document Reference: LR.TREE.02

9th November 2026

Dear Chris and Louise,

Thank you for your detailed comments on the arboricultural aspects of our application.

The original Arboricultural Impact Assessment and Arboricultural Method Statement (AIA/AMS), prepared by Arbortrack Systems Ltd in May 2022, were submitted and considered as part of outline application AWDM/0821/22, under which the proposed access was approved.

We had therefore understood that the general principles of the access arrangement and associated root-protection measures were acceptable. Nevertheless, we have carefully reviewed your comments and substantially updated the relevant drawings and technical information to address the matters raised.

James has assisted us on several previous projects, and we would prefer to retain his original assessment as the technical baseline wherever practicable, supplemented by the revised information and appropriate arboricultural verification.

1. Tree Removals and Replacement Planting

Tree Officer's comments

The original AIA identifies the removal of T5, part of G6, T7–T10, part of G11, G14, T18, T19, T22, T33 and G34. These are principally Category C trees, with T10 assessed as Category U. No objection is raised to their removal, subject to suitable replacement planting.

Our response

Thank you for confirming that you have no objection in principle to the removal of the identified trees, subject to appropriate replacement planting.

T18 and T22 are located outside the current application boundary and are not proposed for removal as part of this application.

We have updated drawing LR.R.BRIDGE.02 to identify eleven proposed replacement trees, T01–T11, comprising a combination of native species, fruit trees and ornamental evergreens.

The planting schedule, specifications and five-year maintenance arrangements are detailed in Section 12 of the accompanying Supplementary Arboricultural Method Statement, LR.AMS.01.

The replacement planting forms part of a wider landscaping and biodiversity enhancement strategy, supported by the accompanying biodiversity assessment.

2. Retained Category B Trees and Specialist RootBridge Construction

Tree Officer's comments

The retained Category B trees and off-site trees whose Root Protection Areas (RPAs) interact with the development are of greater arboricultural significance. The proposed driveway passes through the calculated RPA of G12, a group of mature off-site Leyland cypress trees. Further site-specific information has been requested on levels, foundation locations, installation methods, surfacing, edge restraints, drainage and arboricultural supervision.

Our response

T32 – Copper Beech (Category B)

The original application showed a small area of hardstanding within the calculated RPA of T32. The revised layout removes this encroachment, with all proposed buildings and permanent hardstanding located outside the RPA, as shown on drawing LR.R.BRIDGE.02.

T13 – Holm Oak (Category B)

The proposed access extends approximately 1.7m into the outer edge of T13's calculated RPA. Based on its calculated radius of approximately 10.7 m, the affected area represents approximately 3.5% of the total RPA.

Approximately half of the affected area is accommodated by the specialist RootBridge construction, with the remainder (1.75%) protected by the CORE TRP 150 cellular ground-protection system.

Given the limited extent of the encroachment and the proposed no-dig construction measures, we consider the potential impact on T13 to be minimal.

G12 – Leyland Cypress (Category C2)

G12 comprises mature off-site Leyland cypress trees assessed as Category C2 in the original AIA. We understand that these trees are not subject to a Tree Preservation Order.

The revised driveway arrangement follows the RootBridge principles established in the original assessment, with additional CORE TRP 150 cellular ground protection to adjoining sections of the access.

The specialist construction is intended to distribute vehicle loading while avoiding conventional excavation and compaction of the underlying root-bearing ground.

We have now prepared revised drawing LR.R.BRIDGE.02 and Supplementary Arboricultural Method Statement LR.AMS.01, which provide detailed information covering:

- Existing and proposed ground levels.
- RootBridge construction and structural support positions.
- Ground-screw foundations and structural steelwork.
- STACO access grating.
- CORE TRP 150 cellular ground protection.
- Supplementary EcoGrid reinforcement and SureSet permeable resin-bound surfacing.
- Granite sett edging and road transitions.
- Drainage and service installation.
- Tree-protection fencing and arboricultural supervision.

The supporting technical information is included within Appendices A–L of the Supplementary AMS.

We hope the additional information provides the site-specific construction detail requested.

3. T32 – Copper Beech and Tree Protection

Tree Officer's comments

The original AIA identifies hardstanding within the RPA of T32, a mature Category B copper beech protected by a Tree Preservation Order. The calculated RPA radius is approximately 13.4 m. Appropriate tree protection and control of construction activity are required.

Our response

The revised layout removes the previously identified hardstanding encroachment into the RPA of T32.

Drawing LR.R.BRIDGE.02 identifies the calculated RPA and the proposed protective fencing, which will be installed and maintained in accordance with the approved Tree Protection Plan and Supplementary AMS.

No unauthorised excavation, storage, vehicle movement, ground-level alterations or other construction activities will be permitted within the protected area.

We consider that removing the hardstanding encroachment represents a material improvement over the earlier proposals.

4. T15 – Clarification of No-Dig Construction

Tree Officer's comments

Section 4.1 of the original AIA refers to specialist no-dig construction for T15 and G12, whereas Section 3.7.1 discusses the RootBridge treatment in relation to G12. Clarification has been requested on the extent of any no-dig construction required in relation to T15.

Our response

T15 is an off-site Leyland cypress located outside the current application boundary.

Revised drawing LR.R.BRIDGE.02 identifies T15 and its calculated RPA and confirms that the proposed development works, including the specialist access construction and associated services, fall outside its identified RPA.

Accordingly, no specialist RootBridge or cellular ground-protection construction is required specifically in relation to T15.

We acknowledge that the references to T15 in the original AIA may have caused some ambiguity and hope the revised drawing resolves this matter.

5. Age of the Original Arboricultural Survey

Tree Officer's comments

The underlying tree survey was undertaken on 18 November 2021. An updated survey or site verification is recommended to confirm whether the tree data, categorisation, RPAs and conclusions of the original AIA remain valid.

Our response

We acknowledge that the original tree survey was undertaken in November 2021, with the AIA subsequently completed in May 2022.

The original assessment was considered during the previous outline planning application, and we believe its principal arboricultural constraints and specialist root-protection methodology remain relevant to the current proposals.

The revised development layout has also reduced the potential impact on certain retained trees, particularly T32, where the previously identified hardstanding encroachment has been removed.

Given these circumstances, we would appreciate your agreement to retain the original Arbortrack AIA as the technical baseline, supplemented by the revised drawing and detailed Supplementary Arboricultural Method Statement LR.AMS.01.

There would be six defined arboricultural inspection stages detailed in Section 10 of the Supplementary AMS, supported by routine site management and comprehensive photographic and written records. Rhis will also include the appraisal of the retained trees.

On completion, the supervising arboriculturist would prepare a report identifying the works inspected or verified, any corrective measures and the condition of the retained trees.

We hope this approach will provide the necessary reassurance regarding both the current tree constraints and the implementation of the proposed protection measures, without requiring an entirely new AIA.

Should the initial inspection identify material changes affecting the original assessment, these would be reviewed and addressed before the relevant works proceed.

6. Tree Protection and Arboricultural Supervision

Tree Officer's comments

The principles of protective fencing and ground protection shown on the submitted Tree Protection Plan are supported. A more specific supervision programme is recommended, covering pre-commencement inspections, specialist construction within RPAs, unexpected excavation and a completion inspection.

Our response

We welcome your confirmation that the general tree-protection principles are supported.

Revised drawing LR.R.BRIDGE.02 identifies the proposed protective fencing, ground-protection arrangements and specialist construction details.

We have also prepared a detailed supervision programme within Section 10 of Supplementary AMS, LR.AMS.01, incorporating six defined arboricultural inspection hold points:

1. **HP1 – Initial Arboricultural Inspection and Tree Protection:** Verification of current tree conditions, relevant RPAs and protective fencing and ground-protection arrangements.
2. **HP2 – Specialist Construction Setting Out:** Review of ground-screw and structural support positions, including root-sensitive investigation and any necessary adjustments.
3. **HP3 – Root-Sensitive Construction:** Arboricultural supervision during critical specialist construction operations within RPAs.
4. **HP4 – Services and Unexpected Excavation:** Review and supervision of any unavoidable service installation or excavation within RPAs.
5. **HP5 – Completion of Specialist Construction:** Inspection and verification of the relevant completed protection measures and review of construction records.
6. **HP6 – Final Arboricultural Inspection:** Inspection of retained trees and protected areas, identification of outstanding measures and confirmation of appropriate completion arrangements.

The nominated site manager will remain responsible for day-to-day compliance with the approved AMS, including maintaining protective fencing, monitoring construction activities and recording significant observations.

The appointed arboriculturist will undertake the applicable specialist inspections and maintain written records supported by photographs.

A completion report will be prepared identifying the works inspected or verified, the evidence reviewed and any outstanding measures.

We believe this provides a clear and proportionate supervision arrangement, with defined specialist inspections supported by continuous day-to-day site management.

7. Drainage and Service Installations

Tree Officer's comments

The final drainage and utility layouts should avoid the RPAs of retained trees wherever practicable. Any unavoidable incursion should be agreed with the Local Planning Authority and supported by an appropriate arboricultural method statement.

Our response

The original proposal included a sewer crossing through the RPA of G12. This has now been omitted from the revised servicing arrangement.

The proposed services are limited to a small-bore water supply and mains electricity cable, following the route identified on drawing LR.R.BRIDGE.02.

The service corridor follows the area adjacent to the neighbouring property's swimming-pool retaining wall, where the ground is understood to contain previously disturbed rubble backfill.

We recognise that the presence of rubble backfill does not necessarily exclude significant roots, and appropriate precautions will therefore be taken wherever excavation is necessary.

Section 9 of Supplementary AMS LR.AMS.01 now provides the proposed service installation methodology, including the procedures for root-sensitive excavation, unexpected roots, alternative installation methods and arboricultural supervision.

The methodology draws upon the relevant principles of Barrell Tree Consultancy SGN7, *Excavation in Root Protection Areas*, and SGN10, *Installing Structures in Root Protection Areas*.

Relevant works will be documented through the arboricultural inspection and construction records.

8. Proposed Planning Conditions

Tree Officer's comments

The recommended conditions cover the final Arboricultural Method Statement and Tree Protection Plan, protective fencing and ground protection, specialist construction within RPAs, arboricultural supervision, drainage and services, and replacement planting.

Our response

We are generally supportive of the proposed arboricultural conditions and appreciate Chris's willingness to recommend approval subject to appropriate safeguards.

Our preference would be to agree as much of the revised technical information as possible before determination.

We have now prepared revised drawing LR.R.BRIDGE.02 and Supplementary Arboricultural Method Statement LR.AMS.01, incorporating the detailed construction methodology, tree-protection measures, six arboricultural inspection hold points, replacement planting and supporting technical appendices.

We hope these documents address the principal matters raised and can be agreed before determination, thereby reducing the need for further pre-commencement submissions.

However we would welcome appropriately worded conditions requiring those details to be agreed before the relevant works commence.

The proposed dwelling is being designed to the Passive House Plus standard, and the detailed design is likely to take some time. We hope James Bell will be available to undertake the arboricultural supervision when the works proceed.

9. Summary and Conclusion

Thank you, Chris, for your constructive comments and for indicating that the application may be supported on arboricultural grounds, subject to the matters raised being satisfactorily addressed.

We have sought to respond comprehensively to those matters while retaining the principles of the original Arbortrack assessment considered under the previous outline permission.

In particular:

- The revised layout removes the previously identified hardstanding encroachment into the RPA of T32.
- The limited encroachment into T13's RPA, approximately 3.5%, is addressed through specialist low-impact construction.
- The RootBridge arrangement associated with G12 retains the original protection principles, supplemented by additional cellular ground protection.
- The revised drawing clarifies that the proposed works and services fall outside the calculated RPA of T15.
- The revised servicing strategy removes the previously proposed sewer crossing through the RPA of G12.
- A detailed Supplementary AMS establishes the construction methodology, tree-protection arrangements and six arboricultural inspection hold points.
- Eleven replacement trees are proposed, supported by a five-year maintenance commitment and wider biodiversity enhancement measures.

The principal supporting documents are:

- LR.R.BRIDGE.02 – Revised RootBridge Construction, Tree Protection and Replacement Planting Drawing, including construction and arboricultural notes.
- LR.AMS.01 – Supplementary Arboricultural Method Statement, including technical Appendices A–L.
- Original Arbortrack Arboricultural Impact Assessment and Method Statement, dated 6 May 2022.
- LR.DRAIN.01 – Drainage and Services Drawing.
- LR.BNG.01 final – Biodiversity Enhancement Assessment.
- LR.METRIC.01 – Biodiversity Metric Assessment, with the Excel workbook submitted separately.
- SGN7, SGN9, SGN10, SGN11 - Barrell Tree Consultancy Guidance

The technical appendices to LR.AMS.01 include the RootBridge, Radix, STACO, CORE TRP 150, EcoGrid and SureSet information, together with the structural calculations, specialist arboricultural guidance (Barrell Tree Consultancy's Documents) and inspection record sheet.

We hope the revised information satisfactorily addresses the matters raised and provides a clear basis for the application to progress towards determination.

We would particularly welcome your agreement to retain the original AIA as the arboricultural baseline, supported by the proposed initial site verification and subsequent supervision programme.

Thank you both for your time and assistance.

Kind regards,

Adrian Marmont