



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Land at Campsfield Linfield Close Southwater West Sussex
<b>DESCRIPTION:</b>	Outline application with all matters reserved except for access for up to 82 dwellings with vehicular and pedestrian accesses, public open space, noise mitigation measures, landscaping, foul and surface water drainage and associated works.
<b>REFERENCE:</b>	DC/25/0102
<b>RE-CONSULTATION:</b>	1 <sup>st</sup> set of comments in black 2 <sup>nd</sup> set of comments in blue
<b>RECOMMENDATION:</b>	Holding objection / Modification Advice

### **SUMMARY OF COMMENTS & RECOMMENDATION:**

#### **2<sup>nd</sup> set of comments**

We are largely satisfied with the submitted changes to address the concerns expressed below. Some minor points remain outstanding, but we are confident most can be addressed at detail design stage, save for the open space strategy which remains unclear.

To close this point (7), please ensure a land budget plan is submitted prior to determination to demonstrate how the requirements of the OSSR are being met.

#### **1<sup>st</sup> set of comments**

Based on the information submitted and site's context, we are of the judgement that the proposals are likely to give rise to localised residual Moderate Adverse landscape and visual effects. Nevertheless, by addressing the concerns discussed below and securing a more robust landscape mitigation strategy, we are confident these can be mitigated and the scheme successfully integrated within the receiving landscape.

In order to achieve this, the layout and Parameter Plan must be reviewed to protect, conserve and enhance existing landscape features as per Policies 25, 26 and 33 of the HDPF and to demonstrate compliance with Policy 43. The mitigation strategy must be sympathetic to the landscape context in retaining its wooded character and proposing new, provide a positive designed transition to the countryside, softening the appearance of the development and retaining the verdant character of the area.

## MAIN COMMENTS:

### Site description & context

The proposed site is located to the south of the village of Southwater, outside of the built up area boundary (BUAB), in a countryside location. It is undeveloped, comprising a poplar plantation with bramble understory, mature trees and 2no. ponds in the centre. It is generally rectangular in shape, bounded by mature trees, scrub and vegetation on all sides, thereby creating a sense of containment within the wider landscape.

The immediate site context holds both rural and residential qualities. Ancient Woodland and a small river/stream abut the western boundary and agricultural fields lie adjacent to the southern boundary. However, residential development (Mulberry Fields) abuts the northern boundary and the A24 runs north-south beyond the eastern boundary, somewhat detracting from the sense of peace and tranquillity experienced on site. Proposed site access is from the Mulberry Fields development.

The site's wider landscape context can be described as heavily wooded and rural in nature, comprising an irregular field pattern defined by hedgerow and hedgerow trees, interspersed by large areas of woodland and ancient coppices. 2No. Local Wildlife Sites can be found in the surrounds, including:

- Horsham Common, Alder Coopse, Coate's Furzefield & Constable's Furze – A diverse woodland complex of semi natural, broadleaved and conifer plantation woodlands, neutral meadow, pond and stream providing high wildlife value
- The Downs Link, Nutham Wood & Greatsteeds Farm Meadow – a dismantled railway of semi natural woodland, plantation wood, streams and neutral meadow with high wildlife and recreational value

Multiple public rights of way (PRoWs) are located in proximity, however those that offer views onto site include:

- PRoW 2804 – abutting the southern boundary, running west-east
- PRoW 3215 – running east-west and connecting to PRoW 2804 at the southeastern corner of the proposed site
- PRoW 2815 & Sussex Diamond Way – running west-east to the south of the proposed site

A range of open, partial and glimpse views are available on these routes, and they are experienced by receptors within the countryside, read in line with the wooded and rural context of the surrounding area. Detractors include noise from the A24 and partial views of Mulberry Fields experienced on PRoW 2804 through pockets of cleared boundary vegetation. Notwithstanding this, the woodland plantation, screens built form from the aforementioned footpath routes and the undeveloped nature of the site indirectly contributes to the recreational enjoyment of the users of the footpath.

While the proposed site is not within the Southwater Neighbourhood Plan Area and development does not need to comply with the requirements of its relevant policies, the scheme layout is still expected to be informed by the parishes general aspirations and design guidance. In particular, attention is drawn to policies SNP16 Design and SNP18 Treed Landscape.

### Landscape character and capacity

The proposed site falls within G4 - Southwater and Shipley Wooded Farmlands (LCA) as defined by the Horsham District Landscape Character Assessment (2003). The site and the surrounding contextual landscape is deemed to be representative of the local landscape character area, exhibiting many of the key characteristics, including: *gently undulating, strongly wooded landscape; small to medium size woodland blocks enclosing an irregular pattern of pasture fields; and noise intrusion from the A24.*

Key issues include *potential pressure for urban development around Southwater*. While overall sensitivity to change is high reflecting the area's many intrinsic landscape qualities, it is moderate along the A24 corridor due to the erosion of character that has already taken place. Despite this, relevant Planning and Land Management Guidelines state to:

- *Conserve the rural mostly undeveloped character of the area.*
- *Ensure any appropriate new development on the A24 road corridor is well integrated into the existing landscape pattern with new woodland and hedgerow planting.*
- *Conserve and manage existing woodlands.*
- *Restore hedgerows where they have been lost.*

The Horsham District Landscape Capacity Assessment (2014) locates the proposed site within Local Landscape Character Area (LLCA) 26: Land South of Southwater. Landscape Character Sensitivity is identified by the following key relevant traits: *a gently sloping to undulating landform with a medium scale field pattern; a strong framework of thick hedgerows, shaws and woodland is present in the area; and the landscape in good condition and has an unspoilt rural character.*

Visual sensitivity is low due to *the mostly enclosed nature of the landscape which arises from its heavily wooded character*. LLCA 26 describes the following for relevant qualities in regard to Landscape Value: *ecological and historic interest is provided by areas of ancient woodland and species rich hedgerows; there is moderate tranquillity with noise incursion from the A24; amenity value of landscape is provided by rights of way running along the southern boundary of Southwater.*

In terms of Landscape Capacity, the LLCA concludes that due to the area's strong, unspoilt rural landscape character together with its good landscape condition, there is low-moderate capacity for medium scale development. This development proposes 82 dwellings, which is under the threshold for medium scale development, however, the Capacity Study states that, *Where fewer than 100 homes are proposed around the settlements, it cannot necessarily be assumed that this would lead to a different capacity judgement for the character area concerned. This would need to be assessed on a case by case basis, as part of any more specific land allocation or development control decision.* To this regard, it is our judgement that the capacity for this site remains low-moderate, given the low-moderate visual sensitivity, moderate-high landscape character sensitivity and moderate landscape value.

Low-Moderate capacity is defined as *'The area only has potential to be able to accommodate development in limited locations without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation'*

## LVAIS

1. The LVAIS provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020) and whilst the methodology has been found compliant, the assessment itself is not clear in aspects such as the receptors susceptibility (visual only), sensitivity and magnitude of change. Nevertheless, and based on the proposed methodology, there are aspects of the assessment where we arrived at the same conclusions, whilst others where we are in disagreement. Those that are relevant to seek further mitigation measures to reduce the identified adverse effects are discussed below:

### 4.0 BASELINE CONDITIONS

- a) Value for site's key characteristics is judged as **Medium-High** as opposed to Medium.
- b) Perceptual and Landscape Character value is judged as **Medium**, as opposed to Medium-Low. Although a poplar plantation, this associated with other landscape features as described (sense of enclosure, boundary features, gentle topography), means the perception of the site remains as having a wooded character, representative of the character area. Remoteness and tranquillity are partly hindered towards the site's northern and eastern boundaries by the road noise and adjacent development, but towards the western and southern boundaries and in proximity to the ancient woodland, the detractors diminish and the qualities of the woodland can be

experienced. Similarly, we consider the site to exhibit characteristics and be representative of the landscape character area it sits in.

#### 5.0 VISUAL ASSESSMENT

- c) We concur with the values attributed to visual receptors as indicated within Table 5.1, summary of visual receptors. We note however that there must be a typo within Table 5.2 – as the value of the view has been attributed as Low, across all viewpoints.

#### 6.0 PROPOSED DEVELOPMENT

- d) We concur with the attributed Medium landscape susceptibility of the site to the development proposals. Which combined with our judgment of Landscape character value being Medium, results in the site being attributed a **Medium** Landscape Sensitivity.

#### 7.0 MITIGATION SECTION

- e) We recommend adding advance planting areas to all existing boundaries (where enhancement works have been identified) to the additional mitigation measures and design solutions section 7 of the LVAIS. This can be delivered alongside the enabling operations / protective fencing to the existing trees works and will deliver part of the landscape strategy early on, creating opportunity for boundaries to establish during construction and by the time the development is occupied, being more effective at reducing identified adverse effects day 1.
- f) Mitigation measures must be strengthened to satisfy concern that existing landscape features are not sufficiently safeguarded (please see points 2 to 5). We highlight in particular the area in the middle of the southern boundary, in proximity to G27, T24 & T25. Currently opportunities for substantial buffer planting in this area is taken up by hardscaping and a proposed footpath.
- g) In addition, the primary street is discussed within the mitigation strategy as being tree lined, however this is not reflected in the parameter plan or illustrative masterplan.

#### 9.0 ASSESSMENT OF LANDSCAPE AND VISUAL EFFECTS

- h) We are of the judgment that on balance, the overall effects on the landscape character of the site are considered Major-Moderate adverse, reducing to **Moderate Adverse** with the maturation of the landscape proposals. This is due to the concerns with loss and deterioration of the existing landscape features as raised at point f) which would result in a sizeable magnitude of change.
- i) For similar reasons, we consider the effects on the transient receptors using PROW 2804 to be Major-Moderate Adverse and residual effects **Moderate Adverse**. The existing and proposed openings in vegetation on the southern boundary associated with built form, will noticeably change the composition of the view, given that the distance of existing development from the receptors and existing plantation woodland, effectively screens or softens built form currently.
- j) Therefore, and to strengthen the mitigation strategy to achieve the not significant, **residual Moderate-Minor adverse effects**, modification to the road layout must be considered alongside enhancement of the boundary. Please see recommendations below.

#### Design considerations

2. Given the undeveloped nature of the site, it is required that RPAs are entirely avoided in order to secure the retention of key landscape features such as trees and hedgerows. The parameter plan and indicative layout therefore must be amended to demonstrate no encroachment with the RPAs of A category T7, A category T19 & T20, A category T25, A category T37 & T38, A category T44, and B category T56.

The layout has been amended to avoid the majority of the RPAs, with many thanks. It is regrettable that RPA's T53, T37 & T38 have not been totally avoided at this stage, however

we recognise this is likely to comply with the minimum recommendations of the relevant design standard (BS5837:2012 Trees in relation to design, demolition and construction – Recommendations). Nevertheless, we encourage these minor changes to be made at detail design stage.

3. T44 is of key concern with the location of proposed link road as shown in the parameter plan. Notwithstanding, a more organic road layout would be welcomed in this location.  
**Amended in regard to T44, with thanks.**
4. In addition, a far greater provision of buffer planting to enhance the southern boundary is expected. This will contribute to mitigate adverse effects experienced by users of the adjacent PRoW and short distance views from the long-distance Sussex Diamond Way (viewpoints 6, 7, 8 and 33) but also ensure successful integration of the scheme into the landscape by providing a robust key feature of the character area and mitigate for the loss of the existing woodland plantation and perceived woodland character. The planted buffer therefore must include woodland, tree and understorey planting, and have a minimum 15m width. Medium/long distance PRoWs (viewpoints 12, 16, 17, 18 and 19) will benefit from the offsite woodland creation proposed as part of the BNG proposals which should be sufficient to mitigate any of the identified partial views. Overall, these measures will also contribute to the aspirations of a treed landscape within the neighbourhood plan.

We welcome the increased landscape buffer to the south of the western parcel to 15m and the 7m to the south of the eastern parcel, and consider these a positive change in order to mitigate identified adverse effects. We note these measures are not represented within the parameter plan however there is reference to it within the LVAIS and Landscape Design Statement, therefore we are satisfied that this can be secured within the reserved matters layout.

5. In order to facilitate access to PRoW 2804, existing mature boundary vegetation will need to be removed in multiple locations. We see little benefit in the loss of a well-established and important landscape feature to provide access for a small number of residents, when an existing break in the field boundary already exists, located in the southeastern corner along the southern boundary. We request that the proposed pedestrian links shown in the parameter plan are changed to reflect the existing access as a measure to reduce identified adverse landscape and visual effects.

We note within the updated Planning Statement and LVAIS reference that pedestrian connections to the PRoW have been reviewed in order to avoid unnecessary loss of vegetation as above, however these connections seem to remain largely unchanged within the parameter plan. We acknowledge that the proposed acoustic barrier prevents the use of the existing break in the boundary as suggested. However, we expect to see the route altered to reflect the existing clearing in mature vegetation within the central portion of the site as well as clear indication of the extent of loss of any proposed clearance at reserve matters stage.

6. Further, the Parameter Plan and illustrative masterplan should identify the provision of a tree lined primary street (as identified within the LVAIS, mitigation section 7).

Not yet addressed. Recommend this is pursued however, will leave to the case officer to confirm if the information as submitted is sufficient to secure provision at reserved matters stage.

7. A land budget plan must be submitted to demonstrate the scheme can deliver an open space strategy that meets the Council's requirements within the Open Space, Sport & Recreation Review 2021 (OSSRR) guidance document and comply with HDPF policy 43. The plan must identify the various categories of open space (parks and gardens (which should include kick about area), amenity space, natural and semi-natural, play areas, allotments), areas measurements, and also demonstrate that accessible standards and distance buffers are achievable. **Not yet addressed. We continue to request that measurement is provided and categories of open space formally identified so that it can be demonstrated how the OSSR and HDPF policy 43 is complied with. We note reference to**

allotment provision not being an efficient use of land and therefore recommend that an off-site contribution or appropriate mechanism is secured, given the deficit within the parish.

8. Looking at the deficiency/surplus section of the report within the parish of Southwater and considering the close proximity of the play area within the adjacent development, our recommendation is that the provision of allotments (min 400m2) is secured instead of a play area (LEAP) and part of the parks and gardens quantity requirements (parks and gardens min area is 2000m2). Please refer to the OSSRR report for allotment design standards. If this is not desirable, please demonstrate how and which open space requirements are to be delivered on site/off site as above.
9. Youth areas and facilities is also in deficit within the parish; therefore, we recommend seeking a £13,382.40 contribution for offsite provision. This calculation is based on the 78.72m2 youth requirement x £170sqm play provision for offsite contributions. See paragraph 345, table 11.1.3: off-site contributions of the OSSRR. If this is not desirable, please demonstrate how and which open space requirements are to be delivered on site/off site as above.

10. Please see below OSSRR tabled requirements:

This proposal is for the following number of units			82	comprising:	82	Unknown size and type (eg Outline proposal)				
occupancy assumption	number of units	calculated occupancy of scheme	Allotments 1.8m2 per person	Open space required per person:			Parks and Gardens 13.8m2 per person	Amenity	Natural and Semi-Natural 24.3m2 per person	Children and young people proposed / potential split:
				Multi-functional greenspace 43.9m2 per person	Children and young people 0.9m2 per person					
unknown	2.4	82	196.8	354.24	8639.52	177.12	13.8	5.8	24.3	0.5 0.4
1 bed flats	1.2	0	0	0	0	0	2715.84	1141.44	4782.24	98.4 78.72
1 bed houses	1.7	0	0	0	0	0	0	0	0	0 0
2 bed flats	1.3	0	0	0	0	0	0	0	0	0 0
2 bed houses	1.8	0	0	0	0	0	0	0	0	0 0
3 bed flats	1.7	0	0	0	0	0	0	0	0	0 0
3 bed houses	2.2	0	0	0	0	0	0	0	0	0 0
4+ flats	2.4	0	0	0	0	0	0	0	0	0 0
4 bed houses	2.7	0	0	0	0	0	0	0	0	0 0
5+ bed houses	3	0	0	0	0	0	0	0	0	0 0
Area required for each typology (m2)			354.24	8639.52	177.12		2715.84	1141.44	4782.24	98.4 78.72
Area required for each typology (hectares)			0.035424	0.863952	0.017712		0.271584	0.114144	0.478224	0.00984 0.007872

11. Despite the location of the pump station, we welcome the retention and protection of the green view 'cone' in order to allow long distance views towards the South Downs, as originally proposed under DC/14/2582.

## RECOMMENDED CONDITIONS:

If you're minded to recommend the application for approval without the concerns addressed above please get in touch as specific conditions will be required.

If the principle of development is found to be acceptable, the following conditions are required:

### Underground Services

**Pre-Commencement Condition:** No development shall commence until full details of underground services, including locations, dimensions and depths of all service facilities and required ground excavations, have been submitted to and approved by the Local Planning Authority in writing. The submitted details shall be coordinated with the landscaping proposals and

Arboricultural Method Statement. The development shall thereafter be carried out in accordance with the approved details.

Reason: As this matter is fundamental to the acceptable delivery of this permission, to ensure the underground services do not conflict with satisfactory landscaping in the interests of amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

### **Advanced Planting**

**Pre-Commencement (Slab Level) Condition:** No development above slab level of any part of the development hereby permitted shall take place until areas of structural and mitigation vegetation suitable for advance planting are identified, submitted to and approved in writing by the Local Planning Authority. These are likely to include enhancement planting along existing boundaries and along existing landscape features within the site. Confirmation of the delivery of these landscape works shall be submitted to and approved, in writing, by the Local Planning Authority.

Reason: To ensure identified adverse visual effects are satisfactorily mitigated, including during construction, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

### **Hard and Soft Landscaping Scheme**

**Pre-Occupation Condition:** Prior to the first occupation of any part of the development hereby permitted, full details of all hard and soft landscaping works shall have been submitted to and approved, in writing, by the Local Planning Authority. The details shall include plans and measures addressing the following:

- Details of all existing trees and planting to be retained and removed.
- Planting and seeding plans, including a schedule specifying plant numbers, sizes, densities and species in Latin names
- Coordination of planting plans with ecological mitigation, compensation and enhancement measures set out in Section 7 of the Ecological Impact Assessment by ecosupport, dated April 2025.
- Hard and soft written specifications (NBS compliant) including ground preparation, cultivation and other operations associated with plant and grass establishment
- Supplier information for plant stock in proximity to Ancient Woodland – only locally-sourced planting stock should be used and only certain tree nurseries are suppliers of accredited UK Sourced and Grown stock
- Tree pit and staking/underground guying details, including details for sloping ground and position of root barriers if required
- Details of all hard surfacing materials and finishes, including layout, colour, size, texture, coursing and levels
- Details of all boundary treatments - such as walls, fencing and railings - including location, type, heights and materials
- Details of minor artefacts and structures – such as bin stores, cycle stores, street furniture, play equipment and signage – including location, size, colour and specification
- Details of existing and proposed levels for all external earthworks associated with the landscape proposals – such as SuDS, play areas, retaining walls, mounding etc - including cross sections where necessary
- Details of all external lighting
- Details of rain gardens

The approved landscaping scheme shall be fully implemented in accordance with the approved details within the first planting season following the first occupation of any part of the development. Unless otherwise agreed as part of the approved landscaping, no trees or hedges on

the site shall be wilfully damaged or uprooted, felled/removed, topped or lopped without the previous written consent of the Local Planning Authority until 5 years after completion of the development. Any proposed planting, which within a period of 5 years, dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development that is sympathetic to the landscape and townscape character and built form of the surroundings, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

### **Landscape Management and Maintenance Plan**

**Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until a Landscape Management and Maintenance Plan (LMMP) has been submitted to and approved in writing by the Local Planning Authority. The details should apply to all communal hard and soft landscape areas and shall include:

- Long term design objectives
- Management responsibilities
- A description of landscape components
- Management prescriptions
- Maintenance schedules
- Accompanying plan delineating areas of responsibility

The landscape areas shall thereafter be managed and maintained in accordance with the approved details unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development and in the interests of visual amenity and nature conservation in accordance with Policy 33 of the Horsham District Planning Framework (2015).

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<b>DEPARTMENT:</b>	Specialists Team - Strategic Planning
<b>DATE:</b>	17/03/2025 05/06/2025
<b>SIGNED OFF BY:</b>	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
<b>DATE:</b>	25 /03/2025 12/06/2025