



Horsham District Council  
Parkside  
Horsham  
West Sussex  
RH12 1RL

Date: 26 September 2025  
Our ref: 08417

For the attention of: Nicola Pettifer

**Application ref:** DC/25/1019  
**Location:** Land To The West of Shoreham Road Small Dole West Sussex  
**Proposal/Description:** Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.

Thank you for consulting with Place Services on the above Outline planning application. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

## Summary

|  |                                     |
|--|-------------------------------------|
| Not supportive on landscape grounds                                | <input type="checkbox"/>            |
| Supportive subject to attached recommendations and / or conditions | <input type="checkbox"/>            |
| Further information required prior to determination                | <input checked="" type="checkbox"/> |
| No landscape comments / does not wish to comment                   | <input type="checkbox"/>            |

This review is based on a desktop study with a site visit of the above-referenced application and its submitted documents. The site visit was undertaken on 19/09/2025 and our landscape comments are as follows:

## Site Context:

The site is located on the western settlement edge of Small Dole and comprises a single grassland field accessed via Henfield Road (A2037). The boundaries are generally vegetated. The wider landscape comprises residential development at New Hall Lane to the north and east beyond Henfield Road. The landscape to the south-west comprises open agricultural landscape which extends towards the River Adur.

The South Downs National Park (SNDP) is located to the east on the edge of Small Dole's settlement edge.

### **Planning Policy Context:**

#### Horsham District Planning Framework

The Horsham District Planning Framework (2015) (HDPF) Proposals Maps identifies the site as being located outside the defined built-up area boundary and therefore designated as countryside.

Policy 26: Countryside Protection sets out a presumption against development unless for agriculture, forestry minerals, quiet informal recreation or ensures the sustainable development of rural areas. The Policy also states that development permitted must be of a scale appropriate to its countryside character location and must not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside and/or conserves, and / or enhances, the key features and characteristics of the landscape character area in which it is located.

Policy 25: 'The Natural Environment and Landscape Character' sets out that development proposals will be required to protect, conserve, and enhance the landscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.

Policy 31: Green Infrastructure and Biodiversity requires development to contribute to the enhancement of existing biodiversity and should also be compliant with Policy 33: Development Principles which states that proposals should be distinctive in character, respect the character of the surrounding area (including its overall setting, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments.

#### Horsham District Local Plan 2023-2040 Regulation 19

As of September 2025, the Horsham District Local Plan (Regulation 19) is 'submitted' and is regarded as relevant. The site is draft allocated within this plan as SMD1: Land west of Shoreham Road and covered by Strategic Policy HA16: Small Dole which sets that the site is allocated for up to 40 homes and states:

2. In addition to meeting national and Local Plan requirements, development will be supported where proposals:
  - a. Are limited to the eastern end of the site with a significant proportion of the site (western and northern parts) given to public open space and recreation use

- b. Deliver sustainable drainage systems (SuDS) along the southern boundary
- c. Are designed to take account of the rural character around the site, and incorporate measures to mitigate against any harm to the landscape character
- d. Deliver access from the A2037.

Further Policies include:

#### Strategic Policy 13: The Natural Environment and Landscape Character

This policy aims to conserve and enhance Horsham's diverse landscape character. It requires developments to respond positively to local character assessments and integrate with the surrounding natural environment. Updates include alignment with the Local Nature Recovery Strategy and neighbourhood plans.

#### Strategic Policy 14: Countryside Protection

Focused on safeguarding the countryside from inappropriate development, this policy now references key landscape evidence documents. It also incorporates the High Weald AONB Management Plan to guide proposals near designated landscapes.

#### Strategic Policy 16: Protected Landscapes

This policy protects nationally designated areas such as the South Downs National Park and AONBs. While unchanged from earlier drafts, it reinforces the need for sensitive design and mitigation to preserve landscape quality.

#### Strategic Policy 17: Green Infrastructure and Biodiversity

This policy promotes the enhancement of green infrastructure and biodiversity. It now requires a 12% biodiversity net gain and encourages developments to contribute to multifunctional landscapes that support ecology, recreation, and climate resilience.

#### Strategic Policy 20: Development Principles

This policy includes requirements for tree-lined streets and inclusive design, supporting the integration of landscape features into urban environments and enhancing visual and ecological value.

### **Review of the proposal/submitted information:**

#### Landscape Visual Appraisal (LVA)

The application is accompanied by a Landscape and Visual Appraisal (LVA) prepared by SLR. Overall, the LVA has been conducted in accordance with the principles outlined in the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3), published by the Landscape Institute (LI).

Section 3 of the LVA sets out the ‘Aspects of the Development which have the Potential to cause Landscape and Visual Effects’ referring to the indicative site layout prepared by OSP (drawing 23088/C101A). However, the submitted site layout plan under this application is a later revision (drawing 23088/C101D).

### Landscape Character

The LVA correctly identifies the site as being located within the following character areas:

- NCA 121: Low Weald (Natural England National Character Areas (NCAs, 2015))
- LW11: Eastern Scarp Footslopes (West Sussex Landscape Character Assessment (2005))
- D2: Shoreham and Small Dole Farmlands (Horsham District Landscape Character Assessment (October 2003))

Table D1: Landscape Value concludes that the overall value of the site is assessed as ‘Local Authority’. Landscape value has been assessed using Table A-1 ‘Interpretation of Landscape Designations’. We recognise reference made to Para 5.24 of GLVIA3 and highlight para 22.3.2 of TGN 02/21 which states: *“GLVIA3 recognises that landscape value is not always signified by designation: ‘the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value’ (paragraph 5.26).”* We do not consider the use of designations as an appropriate ‘starting point’ for assessing value.

Table D1 assesses value of the natural heritage as ‘community’ noting that *“The south, east and western boundaries of the site are bound by well-established hedgerows and trees.”* However, continues to state that *“The [sic] are no ecological features within the site or its immediate vicinity.”* We consider the aforementioned well established hedgerow boundaries and trees contribute towards the natural heritage value *“Landscape which contains valued natural capital assets that contribute to ecosystem services”* (TGN 02/21 Table1).

We welcome the assessment of the ‘Setting of the South Downs National Park’ where section 2.4 concludes *“Consequently, the site does form part of the Setting of the SDNP. As a result, the proposed development has been carefully designed to ensure that adverse effects on the SDNP are minimised and mitigated wherever possible.”*

Generally, we agree with the conclusions of landscape effects in para 7.3 which judge the effect on the site to be major/moderate (negative) and the effects to LCA C1 to be moderate/minor (negative).

### Visual Amenity

Type 1 (annotated) and Type 3 (photomontages) have been provided and appear to be in accordance with Technical Guidance Note 06/19. However, the extent of plant growth shown in Photomontage 5 (Year 15) is considered unrealistic, and it is anticipated that filtered views of the two-storey block will still be visible at Year 15.

We have further concerns regarding the impact on potential views from the proposed public open space (POS) where the large blocks of 2 storey buildings are located to the south-eastern corner. Given the distinct presence of the South Downs from the location of the POS we encourage the layout to allow for a framed view through this corner to retain and celebrate this connection. In turn, reducing the intervisibility from the identified 360 viewpoint location at VP9. Relocation or reduction of building heights is recommended.

### Parameter Plans

No parameter plans have been submitted and there is a reliance on information within the Design and Access Statement (April 2025) regarding development parameters. At outline stage, we request the submission of stand-alone Parameter Plans to be reviewed and approved. As a minimum these should include:

- Developable area
- Building heights
- Green Infrastructure

### Layout and Landscaping

We have the following comments in response to the proposed layout and landscaping:

- We have concerns regarding the management and success of the community orchard and request that edible landscape elements are incorporated into a 'foraging trail' instead with the inclusion of effective interpretation boards. This strategy can further accommodate play-on-the-way and fitness trails providing maximum use of space. It should be noted that orchards are not a key characteristic of the landscape character of the area and would appear incongruent with the surrounding landscape.
- Similarly, the location of the micro allotments presents an increased risk of detracting features within the exposed elevated area of the site. We recommend these are relocated to be incorporated within the development layout.
- We consider the proposed car parking on the edge of the POS undesirable and expect these to be accommodated further south.
- There is a missed opportunity to provide connectivity with the wider landscape to the south where PRoW 2774 1 extends beyond the site boundary.
- The Indicative Coloured Site Layout (dwg. 23088 / C101E) includes a new swale connecting with a SuDS basin in the southwestern corner of the site. We welcome the indication towards a boardwalk in this area and encourage play-on-the-way features

to be included within the swale. Where possible, we encourage the use of swales and rain gardens through the built envelope.

- The current layout has resulted in limited roadside planting and poor pedestrian connectivity. The submission of street sections is requested to clarify the street hierarchy, i.e. to illustrate the relative scale, function, and character of different street types within the proposed layout.

### **Submission documents:**

- 1) Prior to approval we request Parameter Plans to be submitted and approved including:
  - Developable areas
  - Building heights
  - Green Infrastructure
- 2) Following any approval, we expect the following to be submitted as reserved matters:
  - Soft Landscape Plan
  - Planting Plan
  - Hard Landscape Plan to include boundary treatments
  - Landscape Management Plan

### **Summary:**

While the principle of development is not opposed, we consider that the indicative proposals should be reviewed and improved in relation to connectivity, street character and overall layout design. In addition, the submission of standalone Parameters Plan is required to clarify development parameters. Based on the current information provided, we are unable to support the application at this stage.

Please do not hesitate to contact us if you have any queries in relation to this advice.

### **Place Services – Landscape Team**

Email: [landscape@essex.gov.uk](mailto:landscape@essex.gov.uk)



Place Services provide landscape advice on behalf of Horsham District Council.



*Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.*