

FAO Amanda Wilkes
Horsham District Council
Albery House
Springfield Rd
Horsham
RH12 2GB

11 July 2025
Ref: SL/Let/P2197

Dear Amanda,

Response to landscape-related comments received on 2 July 2025 in connection with planning application DC/25/0403 at Stonehouse Farm, Handcross Road, Plummers Plain, West Sussex.

We are writing in response to the landscape comments received on 2 July 2025 in relation to the above application, and to address the outstanding matters raised therein.

We acknowledge the observations made regarding the site's context, sensitivity, landscape character, and the setting of the High Weald National Landscape (HWNL), and we provide the following rebuttal to clarify the proposals, challenge assertions where appropriate, and demonstrate how the development can integrate sensitively with its rural context.

The response will be separated in the individual lots to form a comprehensive response. As follows:

Lot 9 - Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping.

The site, whilst outside the defined Built-Up Area Boundary, is not an undeveloped parcel of countryside. It comprises a group of existing agricultural buildings and areas of hardstanding, historically used for dairy farming. These features have resulted in a developed character, distinct from the open rural land surrounding it. The site is situated within an area that is now predominantly residential in nature, with only limited agricultural activity remaining. The proposals seek to sensitively redevelop this previously developed land, replacing functional and often visually incongruent structures with dwellings of a comparable scale and appearance inspired by traditional rural architecture.

Managing Director
Chris Barker MATP MRTPI
Directors
Huw James MRTPI
Sam Sykes MRTPI
Adam King ARB
Adam Staniforth FCCA

While the site borders the High Weald National Landscape (HWNL), it does not lie within it. We recognise the importance of protecting the setting of this designation but disagree that the proposals would harm its special qualities. On the contrary, replacing unsightly agricultural buildings with well-designed homes and a robust planting scheme will result in a tangible visual improvement, positively contributing to the HWNL's setting.

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The development has been carefully broken into a low-density layout, set back from the road and softened with estate-style planting and native hedgerows to reflect the established rural pattern of Hammerpond Road. A landscape-led approach has guided the scheme from the outset. Building heights are modest and confined to the scale and footprint of existing structures. Boundary vegetation is retained and enhanced, with new planting proposed along the southern edge to filter views from Hammerpond Road and PRoW 1708.

While it is acknowledged that some intervisibility will remain in the short term, this will reduce significantly once planting matures. Importantly, the site is already viewed in the context of other residential properties and farm buildings, and the proposed dwellings have been designed to integrate within this existing visual framework. In our view, Hammerpond Road is predominantly classified as a residential road and the existing site is at odds with the surrounding character and street scene.

We acknowledge the concerns raised regarding potential increased lighting and associated light spill. In response, amendments have been made to reduce the extent of glazing, particularly on the southern and northern elevations, in order to minimise light pollution and safeguard the rural character and dark skies of the area.

Revised drawings are submitted alongside this letter, demonstrating a reduction in total glazing from 213 sqm to 184.3 sqm across both the front and rear elevations of the properties, equating to a 14% reduction in glazing. It is also important to note that all upper-level glazing is now enclosed within louvred detailing, further mitigating the potential for light spill. External lighting, where necessary, will be limited, directional, and low intensity, and controlled through condition if required.

We respectfully disagree with the landscape officer's concerns regarding hardstanding. The proposed driveway and parking layout has been carefully designed to balance usability and visual sensitivity. The extent of hard surface is modest relative to the overall site and significantly reduced compared to the previous agricultural use. Permeable materials and planting will break up these areas, ensuring they sit comfortably in their rural surroundings. This approach is entirely appropriate and consistent with similar rural schemes in the district.

The landscape strategy has been developed in close alignment with the N1 and L1 Landscape Character Area guidelines. Both the Biodiversity Net Gain and Arboriculture Officers have expressed support for the proposed landscape approach.

In response to the Landscape Officer's comments, we would note that detailed information regarding proposed tree and vegetation species, along with their long-term management, is already provided within the Habitat Management and Monitoring Plan (HMMP) (CSA/6746/07/A), prepared by CSA Environmental. This document has informed the site-wide approach to landscape and biodiversity, including species selection supported by advice from BHA to ensure local suitability. Refer to Appendix A.

While the HMMP does not specifically cover individual Plot applications, a pragmatic approach should be taken on the basis that the species proposed within the plots will align with those in the wider Habitat Bank. These details will be further refined through a future Landscape Condition requiring a Soft Landscaping Plan, which will draw directly from the HMMP species palette to ensure consistency across the site. We therefore consider that sufficient information is already available to assess the proposals, and we refer the Landscape Officer to the HMMP for further detail.

We acknowledge the importance of carefully coordinating service routes with the landscape strategy from the outset to avoid conflicts that may compromise proposed planting. The layout of service runs, including drainage and utilities, will be planned in close consultation with the landscape and arboricultural teams to ensure root protection areas (RPAs) are respected and that sufficient space is maintained for the successful establishment of new trees and hedgerows.

In conclusion, the proposals represent a considered and contextually appropriate redevelopment of a previously developed site. Through responsive design, appropriate planting, and sensitive layout, the scheme will sit comfortably within its rural setting and make a positive contribution to the local landscape. Subject to minor refinements and implementation of agreed mitigation, the proposals fully accord with the aims of HDPF Policies 26 and 30.

Lot 8 - Decommissioning of the Anaerobic Digester and re-use of the existing 2no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath.

The proposals for Lot 8 involve the decommissioning of the Anaerobic Digester and re-use of the two existing agricultural buildings for storage and office purposes (Use Class B8 and E(g)), alongside the diversion of a section of Public Right of Way (PRoW 1708).

It is noted that the layout and external form of the built structures will remain unchanged, and that the proposals fall within a countryside location outside the BUAB. As such, compliance with the relevant criteria of HDPF Policies 25 and 26 is recognised as a key consideration.

PRoW 1708 runs along the eastern edge of the site, offering filtered views towards the buildings and the broader site context. While the visibility of the site from this footpath is acknowledged, it is important to note that the visual character of the site is already defined by a utilitarian agricultural form and operational infrastructure. There is no increase in built form or hard surfacing as they have been approved by the previous consents.

The re-use of these existing structures for low-intensity commercial purposes will not introduce new built form and is therefore unlikely to materially alter the existing visual experience for users of the footpath.

We note the comments regarding potential increases in activity levels associated with the B8 storage use. However, it is our view that the nature and scale of the proposed use can be carefully managed to ensure that it does not generate inappropriate levels of vehicle movement or noise. The operational profile of the site will be modest, with limited HGV movements anticipated, and the surrounding access arrangements will continue to be rural in character. Conditions can be secured to restrict operating hours and external lighting thereby ensuring that the tranquillity of the setting is preserved.

We do not agree that additional tree survey work is necessary. The comprehensiveness and adequacy of the submitted Arboricultural Assessment have already been confirmed by both the Council's Arboricultural Officer (23 April 2025) and the independent Arboricultural Consultant (17 June 2025), neither of whom raised any objection to the proposals. These are the relevant specialists, and their conclusions should be relied upon.

The Site Wide Masterplan has been prepared for illustrative purposes only, to demonstrate the overarching vision for the site and how its various elements relate in a broader context. It is not intended to function as a detailed or approved layout drawing. Certain features shown on the Masterplan such as the ponds and some elements of planting are indicative and do not form part of the formal proposals submitted for approval.

The proximity of the site to Ancient Woodland and the High Weald National Landscape is acknowledged, as is its location within a dark sky sensitive area. As with Lot 9, external lighting proposals will be strictly controlled to prevent light spill. Any external lighting will be low-level, motion-activated or timer-controlled, and carefully positioned to minimise impact on sensitive receptors, habitats and landscape features. Where feasible, lighting will be omitted entirely. No such controls exist at present.

With regard to design detailing and supporting landscape measures, we would note that detailed information regarding proposed tree and vegetation species, along with their long-term management, is already provided within the Habitat Management and Monitoring Plan (HMMP) (CSA/6746/07/A), prepared by CSA Environmental. This document has informed the site-wide approach to landscape and biodiversity, including species selection supported by advice from BHA to ensure local suitability.

While the HMMP does not specifically cover individual Plot applications, a pragmatic approach should be taken on the basis that the species proposed within the plots will align with those in the wider Habitat Bank. These details will be further refined through a future Landscape Condition requiring a Soft Landscaping Plan, which will draw directly from the HMMP species palette to ensure consistency across the site. We therefore consider that sufficient information is already available to assess the proposals, and we refer the Landscape Officer to the HMMP for further detail.

We acknowledge the comments regarding SuDS design but consider the current proposals to strike an appropriate balance between functionality, landscape integration, and biodiversity. Attenuation features are carefully shaped and planted with native species to support both habitat value and visual amenity. While the use of blue-green roofs has been considered, their inclusion on small ancillary structures is not deemed proportionate or practical given their limited scale and impact. Detailed drainage design will be developed and agreed through a suitably worded planning condition.

In summary, the proposals for Lot 8 retain and repurpose existing built form, minimising physical change and avoiding harmful visual or landscape impact. Appropriate mitigation, including revised planting, drainage coordination, and lighting control, will be secured by condition to ensure the development respects its rural setting.

We are confident that, subject to these updates, the proposals align with the relevant landscape policies and can be delivered sensitively within this location.

Lot 2 - Rationalisation and enhancement of existing commercial facilities (Use Classes E(g) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed.

The proposals for this part of the site involve the demolition of two existing buildings and their replacement with new Class E(g), B2 and B8 facilities, along with an extension to an existing building to form a new office and wardens' accommodation. The removal of the existing mobile home and retention of the current site access are also included. The scheme has been designed to consolidate and improve the appearance and function of existing business uses within the site, which is already in established commercial use.

While it is accepted that the site lies outside a defined Built-Up Area Boundary and within a countryside location, the proposals represent an enhancement to an existing business park rather than the introduction of new development into an otherwise undeveloped rural landscape. The surrounding area, while rural in character, includes pockets of low-density development and long-established built form. Views into the site from PRoW 1708 are highly limited, and views from Handcross Road, while more open, are filtered by hedgerows and tree cover along the southern boundary.

We do not agree that additional tree survey work is necessary. The comprehensiveness and adequacy of the submitted Arboricultural Assessment have already been confirmed by both the Council's Arboricultural Officer (23 April 2025) and the independent Arboricultural Consultant (17 June 2025), neither of whom raised any objection to the proposals. These are the relevant specialists, and their conclusions should be relied upon.

With regard to design detailing and supporting landscape measures, we would note that detailed information regarding proposed tree and vegetation species, along with their long-term management, is already provided within the Habitat Management and Monitoring Plan (HMMP) (CSA/6746/07/A), prepared by CSA Environmental. This document has informed the site-wide approach to landscape and biodiversity, including species selection supported by advice from BHA to ensure local suitability.

While the HMMP does not specifically cover individual Plot applications, a pragmatic approach should be taken on the basis that the species proposed within the plots will align with those in the wider Habitat Bank. These details will be further refined through a future Landscape Condition requiring a Soft Landscaping Plan, which will draw directly from the HMMP species palette to ensure consistency across the site. We therefore consider that sufficient information is already available to assess the proposals, and we refer the Landscape Officer to the HMMP for further detail.

We acknowledge the comments regarding activity levels and the potential for incremental impacts from additional light or noise. However, given the commercial use is already long established on the site, the proposals represent a refinement and upgrade of the existing facilities rather than a material intensification.

The use of appropriate external lighting limited in scale, directionally shielded, and restricted by condition will prevent unnecessary light spill and safeguard the dark skies character of the adjoining HWNL. Similarly, hard surfacing will be restrained in extent and composed of rural-appropriate materials, minimising any perception of urbanisation.

We note the officer's comments regarding the detailed SuDS design. However, we consider that the level of information now being requested goes beyond what is appropriate at this stage of the planning process. Matters such as ground contouring, inlet and outlet design, planting schedules, and maintenance regimes are all detailed design considerations that will be appropriately addressed at the next stage. This approach ensures that the necessary detail can be developed in line with the finalised layout and landscape proposals.

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In conclusion, the masterplan proposals represent a modest and well-considered redevelopment of existing agricultural and commercial operations which will result in improved functionality and appearance, while incorporating clear and deliverable landscape mitigation.

The wider masterplan strategy to deliver a BNG habitat bank, should also be acknowledged, providing a significant improvement in both landscape and ecological terms to the wider benefit of the immediate locality.

The proposals have been developed with significant input from neighbours and the Parish Council who are fully supportive of the proposals.

We therefore consider that the proposals present an opportunity to significantly enhance the wider site to the benefit of all and we have taken on board all appropriate issues relating to landscape and ecological impacts to produce a scheme of the highest quality.

As referenced throughout this response, all necessary information is considered to be appropriately addressed at this stage of the application. Further detail, including detailed drainage, planting specifications, species mixes, and management prescriptions, will be brought forward at the detailed design stage through standard planning conditions such as a Soft Landscaping Plan. Requiring this level of detail now would be excessive and disproportionate given the outline nature of the proposals.

The scheme is consistent with HDPF Policies 25, 26, and 30, and provides an appropriate balance between economic use and environmental sensitivity.

In light of the above, we respectfully request that the Landscape Officer reconsiders their position.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning

A handwritten signature in black ink, appearing to be 'C. Barker', written in a cursive style.

Chris Barker MATP MRTPI
Managing Director

Appendix A – Planting Schedule**Scrub Species Lists** (SC-T03)

Provide a detailed species list for the habitat to be created.

Common Name	Scientific Name	Abundance / %
Downy birch	<i>Betula pubescens</i>	10%
Guelder rose	<i>Viburnum opulus</i>	10%
Common hawthorn	<i>Crataegus mongyna</i>	10%
Goat willow	<i>Salix caprea</i>	10%
Holly	<i>Ilex aquifolium</i>	10%
Crab apple	<i>Malus sylvestris</i>	10%
Blackthorn	<i>Prunus spinosa</i>	10%
Wild privet	<i>Ligustrum vulgare</i>	10%
Hazel	<i>Corylus avellana</i>	10%
Willow	<i>Salix spp.</i>	10%

Woodland Species Lists (WO-T03)

Final species mix/abundance will be agreed with a specialist

Common Name	Scientific Name
Hornbeam	<i>Carpinus betulus</i>
English oak	<i>Quercus robur</i>
Common alder	<i>Alnus glutinosa</i>
White willow	<i>Salix alba</i>
Black poplar	<i>Populus nigra</i>
Whitebeam	<i>Sorbus aria</i>
Goat willow	<i>Salix caprea</i>
Field maple	<i>Acer campestre</i>
Common hawthorn	<i>Crataegus mongyna</i>
Blackthorn	<i>Prunus vulgaris</i>
Hazel	<i>Corylus avellana</i>

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Hedgerow Species Lists (HD-T03)

Provide a detailed species list for the habitat to be created (infill planting for hedgerow)

Common Name	Scientific Name	Abundance / %
Hawthorn	<i>Crataegus monogyna</i>	65%
Blackthorn	<i>Prunus spinosa</i>	10%
Field maple	<i>Acer campestre</i>	5%
Hazel	<i>Corylus avellana</i>	5%
Dogwood	<i>Cornus sanguinea</i>	5%
Guelder rose	<i>Viburnum opulus</i>	5%
Spindle	<i>Euonymus europaeus</i>	5%

Individual Trees Species Lists (UT-T03)

Provide a detailed species list for the habitat to be created

Common Name	Scientific Name	Abundance / %
Alder	<i>Alnus glutinosa</i>	13.33
Aspen	<i>Populus tremula</i>	6.67
Black poplar	<i>Populus nigra</i>	6.67
Blackthorn	<i>Prunus spinosa</i>	6.67
Field maple	<i>Acer campestre</i>	6.67
Goat willow	<i>Salix caprea</i>	13.33
Hawthorn	<i>Crataegus monogyna</i>	13.33
Hazel	<i>Corylus avellana</i>	13.33
Hornbeam	<i>Capinus betulus</i>	13.33
Whitebeam	<i>Sorbus aria</i>	6.67