



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Ifield Charlwood Road Ifield West Sussex
DESCRIPTION:	<p>Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a separable way.</p>
REFERENCE:	DC/25/1312
RECOMMENDATION:	Advice / More Information / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: <p>Please note this is an interim response and further comments will follow once the remaining information/documents have been reviewed. Comments at this stage relate to the documents listed below, although where needed, other documents have been cross referenced against these to fully understand the proposals:</p> <ul style="list-style-type: none">• Development Specification & Parameter Plan Framework• ES Chapter 11 – Landscape and Visual (and associated appendices) – separate response to follow on this• Design and Access Statement (more comments likely to follow at a later stage)• Phase 1 Landscape & Ecological Management Plan	

- Surface Water Drainage Statement
- Drainage cross sections and general arrangement plans
- Lighting Impact Assessment

MAIN COMMENTS:

Development Specification & Parameter Plan Framework:

Parameter Plan 1 - Landscape and Public Realm

1. This section includes table 1 indicating quantities for 'Strategic Green Infrastructure' which is embedded in the Parameter Plan. It also includes another table 2 'Additional Green Infrastructure to be secured as part of future RMA' which indicates the minimum sqm requirements of open space per resident. Table 2 does not include the calculations for each typology but confirms that RMAs will need to demonstrate how Green Infrastructure provision (as part of site wide provision, delivered within the areas of strategic green infrastructure on the Landscape and Public Realm Parameter Plan and also on plot as appropriate) meets or exceeds the below minimum standards.
2. The table below indicates the total amount of open space required by each typology. Based on the information provided if we take the natural and semi-natural quantities from the calculations below, the minimum space that should be available within the parameter plan under the 'parks and gardens' category should be 16.056 sqm. Taking out the 6.9ha provision under the proposed secondary school boundary (as this cannot be counted towards the open space calculations), the current parameter plan allows for 19.1ha of open space to meet the open space requirements per person for allotments, children and young people, parks and gardens and amenity green space, as defined within the OSSR.

number of units	calculated occupancy of scheme	Open space required per person:			Multi-functional greenspace proposed / potential split:			Children and young people proposed / potential split:	
		Allotments 1.8m2 per person	Multi-functional greenspace 43.9m2 per person	Children and young people 0.9m2 per person	Parks and Gardens 13.8m2 per person	Amenity Greenspace 5.8m2 per person	Natural and Semi-Natural 24.3m2 per person	Children 0.5m2 per person	Youth areas and facilities 0.4m2 per person
		1.8	43.9	0.9	13.8	5.8	24.3	0.5	0.4
3000	7200	12960	316080	6480	99360	41760	174960	3600	2880
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0
	Area required for each typology (m2)	12960	316080	6480	99360	41760	174960	3600	2880
	Area required for each typology (hectares)	1.296	31.608	0.648	9.936	4.176	17.496	0.36	0.288

3. We have concern with the proposed approach as while it's not disputed the amount of open space provision within the parameter plan may indicate this to be higher than the quantities generated by the number of proposed dwellings, it remains unclear the right type of provision can be secured in the right place, with the right specification and buffer zone requirements, given the number of constraints within the site. Taking the allotment provision as example, it is noted that one of the proposed locations is indicated north of Ifield Court Hotel, which is not conveniently located for future residents. It is also unclear what is the current quantity indicated within the indicative masterplan, being mindful that there is a minimum area of 0.4 ha for each allotment site, which must be able to accommodate a communal shed. In this case, 4 allotment sites are indicated within the

parameter plan and therefore the overall minimum area provided must be 1.6ha even though the number of dwellings and area per person indicates a 1.296ha requirement.

4. The supporting information needs to demonstrate that the various typologies of open space are deliverable in accordance with the definition of each typology as per the OSSR guidance. The proposals would fail the needs of the development if all open space provision was natural green space for example as this would not meet the needs of future residents. Therefore, an accompanying land budget plan must be submitted and must indicate buffer zones and distances have been met.
5. Further, the terminology used in the parameter plan should align with the terminology used within the OSSR for clarity. To this effect it is suggested that the typology shown as Parks and gardens is re-named as multi-functional green space so that it's also clearly inclusive of amenity green space and other uses such as play provision, allotments, etc.
6. As mentioned above, school grounds cannot count towards the Parks and Garden typology provision (as defined in the OSSR) as access to these facilities would not be public and rather controlled by the school, please amend.
7. Two key green links/area of amenity green space (as shown in DAS) is not secured within the parameter plan. These form part of the landscape strategy and would have been considered has part of the embedded mitigation within the LVIA assessment and therefore must be secured as such. The character and successful integration of development within this part of the development rests on significant green corridors breaking out the development area and visually retaining the verdant character through the built environment.



8. Parameter Plan 4 – Building heights – please clarify why vast areas that are to remain undeveloped as open green space are shown as within the 6m building height above existing levels dashed blue light area. We recommend this is removed or tightened to only include sports fencing areas and any associated buildings (such as club house)

ES Volume 2 Technical Appendix 11.4: Visualisations

9. The methodology for visualisations produced by AVR London seem absent from the submitted documents. Please provide.

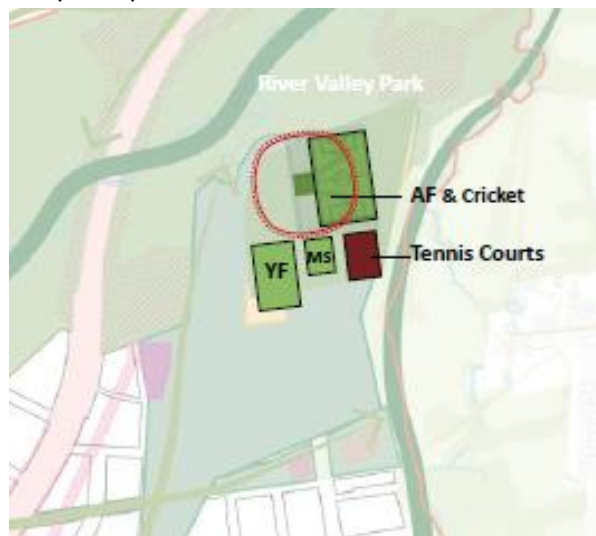
Design and Access Statement:

10. It is noted at page 83 that Padel courts are indicatively shown within the sports hub (see extract below on the left). We have concerns with the uncoordinated nature of the information provided within the various bundles as various concepts are being overlapped without due consideration and with conflicting objectives. For example, padel sports provision is indicated within The Grove, however the same area is shown as an attenuation basin (see page 111 - no 14) as shown on the extract below. The stakeholders looking at

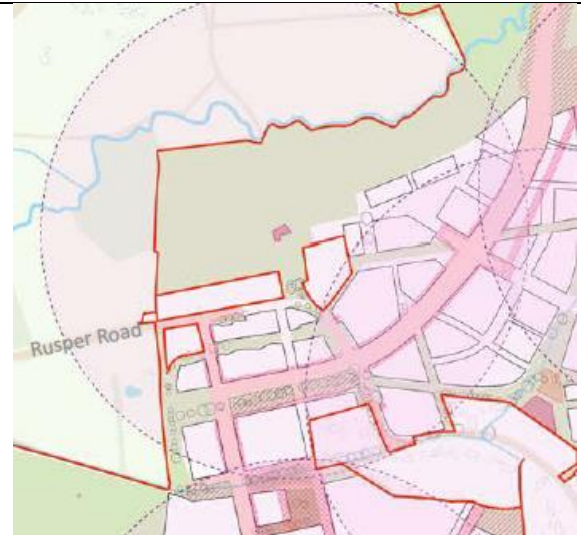
sport provision are unlikely to look at the drainage strategy and vice versa risking the acceptance of both strategies which clearly cannot be delivered in tandem. Given the constraint nature of the site and formal nature of the sports provision with standard dimensions, a suitable location must be demonstrated within the indicative masterplan.



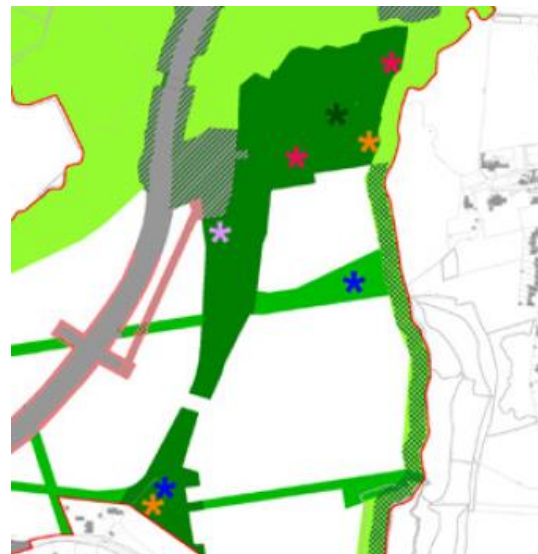
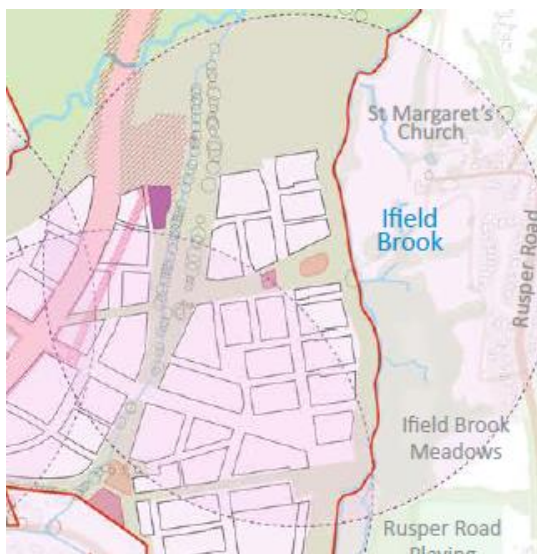
11. Further, a whole development parcel seems to be missing from the Fig 115 indicating the sports facilities within the masterplan. It is clear that there is insufficient space to deliver all of these aspirations within the available open space.



12. Page 116 – Play provision – Please note youth areas and facilities section needs to be expanded to include gender inclusive provision such as sheltered seating, bespoke muga's that are multifunctional and not fenced off on all boundaries, etc.
13. Currently the combined play provision diagram on page 117, indicates an area for 'youth areas and facilities' is to be provided within The Grove, while the parameter plan indicates a NEAP. Please change the parameter plan to secure an outdoor gym in this area as this would be attractive to young people and complement the proposed use of the Sports Hub.



14. The open space indicated below as a potential LEAP location, is considered ideal for informal recreation such as *'kick about space, picnicking, kite flying'* under the amenity greenspace definition. The minimum space requirement for this typology is 0.05ha, with a 80% hard wearing own grass. We recommend the play location within the parameter plan is moved towards the area indicated as 'youth areas and facilities' within the diagram in the DAS. As discussed previously under the parameter plan section, the buffer zones associated with each typology (i.e 20m for a LEAP) must be indicated within the diagrams to demonstrate that sufficient space is allowed within the parameter plans (landscape and land use) to meet the requirements.



15. Orchards - We note that the Planning Statement (PS) refers to proposed orchards, however this is not seen within the Landscape Vision or indicative locations shown within any of the submitted information, please include.
16. Section 5.3 of the Extended Phase 1 Habitat Survey Report recommends green roofs and green walls incorporated into the design of new buildings. We expect to see provision of these in future proposals, noting that the intention should be added to the DAS and Design code.
17. Page 226 – add backrests to the street furniture strategy as well as steel footings for any wood furniture located within soft ground. Please also note that hardwood must be used.

18. Page 240 - Temporary measures inc earthworks or maintenance access that overlap with future development parcels are okay in principle so long this does not have a negative impact on existing vegetation and other features to be retained. Please add to key principles established at section 9.1.
19. Page 244 – Section 9.1 Phasing – As part of the landscape mitigation measures, we recommend that triggers are added to the phasing plans for buffer zones to be delivered as advance planting prior to works above ground start. For example, the buffer zone within the secondary school grounds must be secured prior to any works above slab level. Equally within the detailed part of the road,

Phase 1/ detailed comments:

20. We echo comments made by the BNG officer in regard to marking buffer zones in plan for clarity.

Planting schedule - General considerations

21. Please add quantities to the plant schedule
22. We note that the transitional rain garden meadow mix is the same as the meadow rain garden mix. Please clarify any differences between the two
23. Salix sp. should be introduced within the scheme as per recommendations set out within the EMS.
24. As per planning and land management guidelines of K1 LCA, in future proposals we expect the provision of marginal vegetation along the River Mole tributaries
25. Proposals must align with the requirements of Horsham District Council's *Open Space, Sports & Recreation Review 2021* (OSSR) in order to comply with HDPF Policy 43. As such plants should be sourced from seed or stock from the Region of Provenance 40 in order to ensure resilience and therefore successful establishment. Where this is not possible, given the sensitive location in proximity to irreplaceable AW, planting stock must be locally sourced from suppliers of accredited UK Sourced and Grown stock, in accordance with Woodland Trust guidance. Supplier information must be made available upon request.

Planting schedule - Swales and attenuation basins

26. As highlighted within the OSSR, attenuation basins and swales should blend aesthetically into the surroundings and be planted and combined with variations in vegetation structure to ensure habitat diversity and landscape effect. Further, in order to meet the LEMP objectives of grass swales and attenuation basins being 'species rich and provide habitat value' (4.6.2), these landscape typologies must be planted with nectar rich plants, various grasses and variations in vegetation structure. Please update the planting schedule and Programme of Maintenance and Management Operations (PMMO) within the LEMP accordingly.

Planting schedule - Specimen Trees

27. While Prunus spinosa is recommended within the scheme (see point 30), it isn't deemed appropriate as a specimen tree. Please consider an alternative listed below.
28. Given the sensitive location, further species are requested to increase diversity and thus biosecurity. We recommend Sorbus torminalis and Populus tremula from the Design and Access Statement (DAS), as well as Populus nigra subsp. Betulifolia for areas prone to waterlogging.

Planting Schedule - Woodland and Lowland Mixed Deciduous Woodland

29. All woodland planting should be variably spaced and denser than currently proposed in order to achieve a naturalistic appearance that is characteristic of the local area. We recommend a density of 0.33 per m² for feathers (spacing of 3mx3m), 0.4 per m² for whips (spacing of 2.5mx2.5m), and 0.5 per m² for transplants (spacing of 2mx2m). Please refer to the Woodland Trust for [guidance](#).

Planting Schedule - *Prunus spinosa* (Blackthorn)

30. To meet the LEMP aims of providing site wide Blackthorn, which is further detailed as proposed mitigation within the Ecological Mitigation Strategy (EMS), we recommend its increased provision within the Lowland Mixed Deciduous Woodland Planting Mix and the Woodland Planting mix.
31. As per the EMP, we recommend that Hemp Agrimony and Common Fleabane is planted in proximity to Blackthorn and added to the relevant section of the planting schedule.

Planting Schedule - *Crataegus monogyna* (Hawthorn)

32. We query large areas of Hawthorn proposed in plan, given there is no mention of its requirement as an isolated habitat within the EMS or BNG Assessment. Given the recommendation of Blackthorn indicated above, we suggest this is altered accordingly.

SUDS

33. Ponds are a key characteristic of the K1 – Upper Mole Farmlands local landscape character area (LCA), as demonstrated by the 9 ponds currently found on site. We note that the PS refers to proposed ponds and that ponds are proposed within both the BNG assessment and the Ecological Mitigation Strategy (EMS), the latter of which refers to compensatory replacement ponds for Great Crested Newts. However, no ponds are indicated within the landscape plans and the SuDS Statement specifically states that none are proposed. Please clarify position and demonstrate coordination between submitted information. Consistency must be demonstrated with the BNG assessment & the EMS. The inclusion of ponds would be welcomed from a landscape point of view, appreciating the that sensitive design will have to be considered due to the risk of birdstrike given the proximity of Gatwick Airport.
34. The proposed surface water attenuation strategy focuses predominantly on end of pipe solutions, concentrating on the water storage and slow-release mechanisms. Given the scale of the scheme and the sensitive, countryside location, we request the strategy is revisited to align more closely with the 4 pillars of SuDS which include amenity, water quality, water quantity and biodiversity
35. Rills are listed as a suitable technique within the SuDS strategy however these do not appear to form part of the surface water strategy, please review or justify why cannot be included.
36. 2.5 Phase 1 Site Areas, Impacts and Mitigation Summary Table of the EMS notes that drainage design must ensure robust pollution protection measures are in place to avoid impacts to the River Mole and other controlled waters in the long-term. It's unclear what measures have been proposed and if any of these need to be coordinated with the landscape strategy (we anticipated this to be case). Please clarify.
37. The ground contouring, inlet and outlet design of all SuDS features should be carefully considered to maximise the amenity value. Attenuation basins should blend aesthetically into the surroundings and must not look like steep sided engineered structures. Please add gradients to the cross-sections.
38. In addition, we recommend that headwalls are designed to appear more naturalistic in character, for example, by introducing planting and cladding in Horsham stone. Please provide details

Lighting

39. AW is classified as an irreplaceable habitat and is highly significant to both the character and the ecological function of the area. NPFF 186(c) states that any development resulting in its loss or deterioration should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Direct effects of development can cause loss or deterioration, in part by increasing levels of light pollution. Other landscape features including woodland and hedgerows, which are key characteristics of the local landscape, can also be deteriorated due to increasing levels of light pollution, therefore light spill must be considered sensitively so as not to cause potential adverse effects.

40. We note that sports pitches are located in close proximity to AW and woodland, and thus there is concern with the level of lighting required, particularly the 4000K temperature. Clarification is sought if the whole area is to be illuminated or only the 3G pitch?
41. The EMS proposes the Rive Mole corridor to remain unlit and that use of red light should be considered site wide, however this is at odds with WSCC adoptable specification for road lighting. We recommend that advice is sought from WSCC and that a warmer CCT is opted for, such as 2700K or under, as advised under section 3.1 of West Sussex County Council Highways and [Transport Street Lighting Specification](#).

LEMP - Management & maintenance

42. Section 6.1.2 regarding native hedgerow should specify a height of 1.6m as per the landscape typologies plan.
43. Please add management and maintenance information for hop-over areas.
44. More detail is requested in regard to the artificial veteranisation of existing mid-age trees on site and if any long term maintenance is required.

LEMP - Programme of Maintenance and Management Operations (PMMO)

45. Please specify the Broad Frequency for watering as 'On a performance basis, when no rainfall for 5 weeks' is not enough information. Many trees, including hedgerow, will need watering every 1-2 weeks at specific volumes until established. Please refer to the [Tree Council](#) for further information and update each landscape typology accordingly.
46. We welcome specification that herbicide use relates only to Schedule 9 species and spot application only. Notwithstanding, this is not clear within the PMMO, which recommends herbicide for undesirable weeds and plants growing higher than 500mm. Please amend the task description under rows LMM-66, LMM-67, LMM-75, LMM-78, LMM-82, LMM-87 and LMM-92 to remove use of herbicide and clarify hand weeding alone.
47. Please add 'Litter picking remove off site' to row LMM-95
48. If woodland trees are to be planted with guards, please specify that any stakes, ties and guards should be removed upon successful establishment or after 4 years of planting, whichever is sooner.
49. Litter should be removed once every 4 months, or preferably more frequently, as opposed to 'once or potentially twice per year'. This should at minimum be applied to all ditches and SuDS features, as per the SuDS Manual.
50. The following typologies should be added to the PMMO
 - i. Attenuation basins
 - ii. Transitional rain gardens
 - iii. Hop-over areas
 - iv. Hawthorn areas (see point 32 as this may need amending)
 - v. Ponds (if included, see point 33)
 - vi. Hard landscaped areas

RECOMMENDED CONDITIONS: N/A

NAME:	Inês Watson CMLI Specialists Team Leader (Landscape Architect) & Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	10/11/2025