



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land To The North and South of Mercer Road Warnham West Sussex
DESCRIPTION:	Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
REFERENCE:	DC/25/0151
RE-CONSULT:	1 st set of comments in black 2 nd set of comments in blue
RECOMMENDATION:	Holding Objection / Modification Holding Objection / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: 2nd set of comments While we acknowledge the submission of an updated LVIA, no substantive changes have been made to the proposed layout or landscape strategy. As such our holding objection is maintained. We continue to recommend that further consideration is given to the site layout and overarching landscape framework to ensure that landscape and visual effects are appropriately mitigated. In particular, we seek assurance that the rural and verdant qualities experienced on site and its surroundings is retained, and that the scheme is sensitively and successfully integrated into the receiving landscape. We encourage the applicant to explore opportunities to strengthen green infrastructure and enhance key landscape features as discussed below, but also to refine and consider the spatial arrangement to better respond to the site's landscape context and HDC open space requirements. The revised LVIA introduces elements of assessment that were previously absent which is welcomed. Nevertheless, its content remains unclear in parts and thus non-compliant with the principles and guidance set out in <i>GLVIA3</i>, and its conclusions continue to be disputed. Of particular concern is the continued absence of the requested photomontages, which are regarded as both proportionate and necessary for a development of this nature. Photomontages are an essential tool to illustrate the likely level of visual effects and effectiveness of proposed mitigation measures. Their inclusion will provide greater clarity and transparency in assessing the scheme's integration within the landscape. It is also noted that while additional mitigation measures have been referenced in the LVIA, these are not reflected in the submitted plans. This disconnect undermines confidence in the deliverability and effectiveness of the proposed mitigation strategy.	

In addition, the new and updated viewpoints do not adequately represent worst-case scenarios. The assessment lacks consideration of views during winter months, when vegetation is sparse and screening significantly reduced. The seasonal variation is critical to understanding the full extent of visual effects and should be addressed.

It is noted that the LVIA now includes an assessment of individual landscape elements and considers susceptibility to change, which has informed a revised judgment of overall landscape character effects on the site as *Major adverse*. Although this is agreed with, it is not consistent with the findings presented at Table 2: Effects on Landscape Elements within the Site, where the residual effects are on average *Medium*. At paragraph 7.1 of the report, these are then described as *Major to Moderate*.

The conclusions on the overall effects of the development on the immediate surrounding are recorded as *Minor adverse* but presented on Table 3: Landscape Character Effects as predominantly *Negligible*, with the exception of the effects of the development on the National Character Area which are said to be none (no effects). At para 7. 'the impact of the development on the surrounding area, (...) is assessed as small (...)'. It is also noted the inconsistency with terminology where both effects and impacts are used interchangeably.

With regards to visual effects, the LVIA judges these overall visual effects of the development on the local landscape as moderate/minor in its conclusion page, however Table 4: of the report indicates that where visible, these are Major adverse effects and remain as such at residual stage.

The overall landscape character cumulative effects of the development with the major development to the east of the site is reported as *Minor* due to 'site currently has good enclosure and containment of views within the landscape from the existing woodland, hedgerows, trees and railway line, restricting views to short distance views from adjacent roads.' This is clearly flawed as it mostly relies on visual aspects to conclude the landscape character effects are minor without considering the effects of both proposals on the key characteristic aspects that define character. Based on Table F: Overall Landscape Effects, it would be based on either a ranking of small or negligible magnitude of change combined with medium or low sensitivity.

In our judgement, the cumulative effects of both schemes are likely to be, as a minimum, of a *Moderate* effect, given the magnitude of change will range between Large and Medium (based on Table E of the methodology) as there will be partial loss and major alteration of key elements, features and characteristics of the baseline, permanently changing the rural qualities of the area.

These inconsistencies and unclear presentation of the findings renders the report and its conclusions unreliable.

Our professional judgement remains that based on the current layout and proposed landscape strategy, the localised residual landscape and visual effects are likely to be *Major adverse*.

1st set of comments

Whilst we acknowledge that the site has some capacity for development, we are of the judgement that the proposals are likely to give rise to localised residual Major Adverse landscape and visual effects.

Further consideration of the layout and structural landscaping must be given to ensure landscape and visual harm is appropriately mitigated so that we can be satisfied that the rural, verdant qualities experienced on site can be retained, and the scheme successfully integrated within the receiving landscape.

The current LVIA and layout presents a number of issues and concerns which are discussed in detail below as well as recommendations to enhance the landscape and visual resources.

MAIN COMMENTS:

1. Site description & context

- a. The proposed site is located to the north of Horsham, in the Parish of North Horsham, outside of the built up area boundary (BUAB) and in a countryside location. It is undeveloped, comprising two parcels of land separated by Mercer Road / public right of way (PRoW) 1574.
- b. The immediate site context holds rural qualities due to its undeveloped nature and distinctive landscape features. The northern parcel slopes to the south and comprises two rectangular fields separated by trees, vegetation and a shallow ditch. The parcel is bounded by Ancient Woodland (AW) and woodland to the north, hedgerow and scrub vegetation to the east and west, and mature trees and vegetation to the south alongside Mercer Road / PRoW 1574. The southern parcel is irregular in shape comprising multiple fields, field trees including 2no. veterans and 2no. notable trees, woodland and ponds. A watercourse runs through the site from the southwestern corner to the east, of which the surrounding land gently slopes toward. The parcel is bounded by the avenue of mature chestnut trees and vegetation alongside Mercer Road / PRoW 1574 to the north, trees, hedgerow and scrub vegetation to the east and west and woodland to the south. Some residential dwellings abut the site to the southeast, however their appearance is moderate and congruent within the receiving landscape with some of the boundaries between the site and properties being visually open.
- c. The site's wider landscape context is mixed in character; there is a strong industrial influence immediately to the north due to the Brickworks as well as the railway line abutting the western boundary. In addition, there are urbanising detractors to the south due to the A264 and adjacent residential properties along Longhurst road. However, it can also be described as wooded and pastoral in nature, being predominately undeveloped to the east and west, as well as Warnham Nature Reserve being situated in proximity to the south-west of the site, and further AW situated to the north-east.
- d. Multiple PRoWs are located in proximity, however those that offer views onto site include PRoW 1574, running west-east within the proposed site, as well as PRoW 1421 towards the southeastern corner, running north-east. 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 A264 and Warnham Brickworks. Notwithstanding this, the woodland and mature vegetation screen existing built form, and the open and undeveloped nature of the site contributes to the recreational enjoyment of the users of the footpaths. In addition, expansive views of the southern parcel can be experienced by receptors on Langhurst Wood Road. While this is not designated PRoW, is inevitably used to connect PRoW 1574 to PRoW 1421, and therefore is also sensitive to walkers enjoying the countryside.
- e. The presence of future development to the east of the site is anticipated to change the landscape character baseline conditions by virtue of introducing residential and domestic features to the immediate landscape context, detracting from the current rural character. However, the existing dense vegetation and mitigation measures secured through that scheme, are anticipated to screen the immediate parcel to the east of Langhurst Wood Road reducing the experience and perception of these future urbanising detractors within the site itself.

2. Landscape character and capacity

- a. The proposed site falls within two landscape character areas (LCA) as defined by the Horsham District Landscape Character Assessment (2003): P1 - Upper Arun Valleys to the west and K2 - Faygate & Warnham Vale to the East. The site and the surrounding contextual landscape is deemed to be representative of these local landscape character areas, exhibiting many of their key characteristics. For K2

these include: *flat to gently undulating clay vale; medium to large scale field pattern of arable farmland, with smaller areas of pasture; isolated patches of woodland; semi enclosed or open character; and dominance of major road and rail communication routes.* For P1 these include: *occasional curving strips of woodland on valley side; slightly meandering and steeply banked river and stream courses; and mostly rural unspoilt character, except for urban edge influence around Horsham and some road and aircraft noise in places.*

- b. Key issues for K2 include *progressive loss of hedgerows and hedgerow trees, pressure of traffic on rural lanes and pressure for further urban development.* While K2 has a moderate sensitivity to change reflecting the declining landscape condition, P1 has a high sensitivity to change, reflecting the visual prominence of some valley sides and the many landscape qualities of the area. Key sensitivities are to *any large scale development on valley sides.*
- c. The combined, relevant Planning and Land Management Guidelines state to:
 - i. *Conserve the open character of the floodplain.*
 - ii. *Create new small wetland areas such as reedbeds and marsh.*
 - iii. *Pollard existing willows and plant new ones.*
 - iv. *Ensure any further built development expansion around Horsham and Broadbridge Heath is integrated with existing landscape patterns by bold native woodland and hedgerow planting. Buildings should also blend in with the landscape in scale, form, colour and design.*
 - v. *Reduce the visual impact of the A264 by additional planting, integrated with the existing hedgerow pattern.*
 - vi. *Restore/create new streamside woodlands and marsh.*
 - vii. *Conserve and strengthen existing hedgerows, and plant new hedgerows.*
- d. The Horsham District Landscape Capacity Assessment (2014) locates the southern parcel of the proposed site within Local Landscape Character Area (LLCA) 37: Land North West of Horsham. The northern parcel notably does not fall within an LLCA. Landscape Character Sensitivity is identified by the following key relevant traits: *a flat to very gently undulating landform containing the meandering course of Boldings Brook; medium scale pattern of irregular arable and pasture fields together a few old parkland trees; some significant old and thick hedgerows on hedgerow banks; the area is truncated by the railway and bounded to the south by the A264; and important in retaining separation between the settlements of Horsham and Warnham once the North Horsham allocation site is implemented.*
- e. Visual sensitivity is moderate due to *variable enclosure from hedgerows and hedgerow trees*, and in terms of value, makes a *positive contribution to the green gap between Warnham and future North Horsham development.*
- f. Given the above, the LLCA concludes that there is moderate capacity for medium scale development, which means that the southern parcel has an, *'ability to accommodate development in some parts without unacceptable adverse landscape and visual impacts or compromising the values attached to it, taking account of any appropriate mitigation'*. However, the LLCA states in addition that, *'there is a need for each proposal to be considered on its individual merits to ensure there are no unacceptable adverse impacts'*.

3. LVIA

The LVIA provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020). The report was found difficult to follow and there is uncertainty on how some of the judgements were reached given there are flaws found with the baseline assessment and methodology/presentation of the findings.

The methodology is not clear on how the various judgements interlink and key steps of the assessment, such as susceptibility to inform sensitivity, appears to be missing.

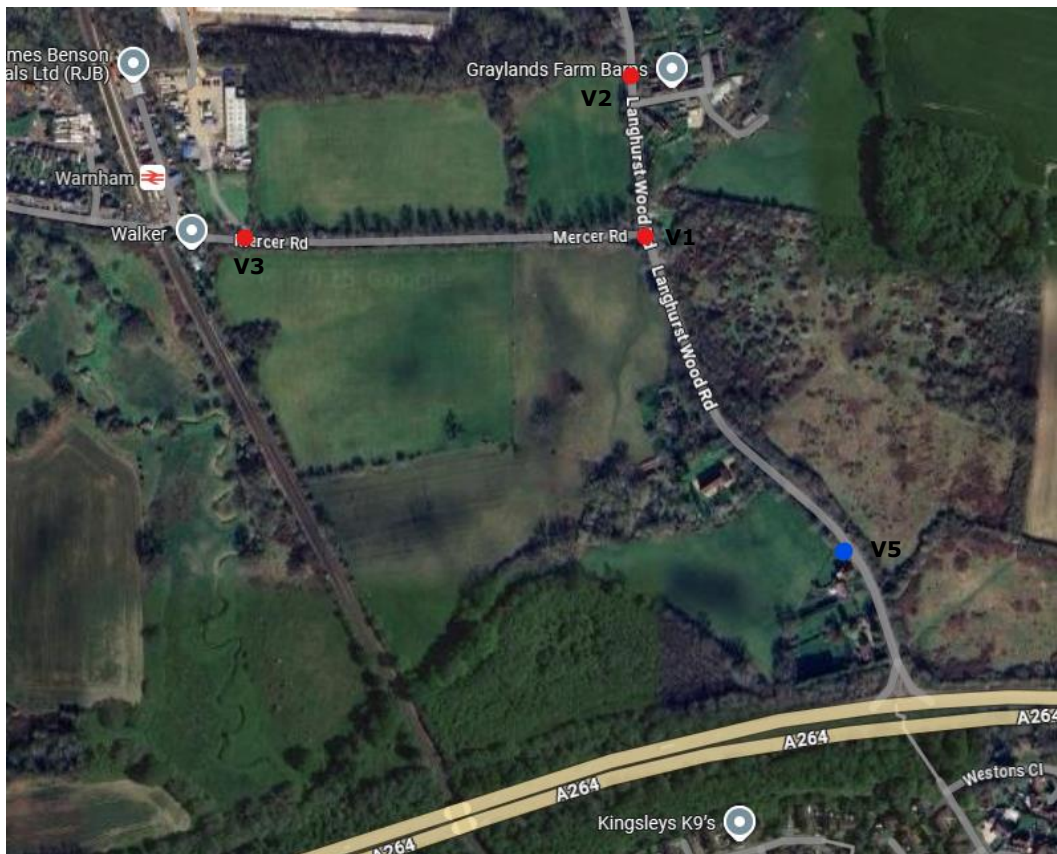
Susceptibility is a measure of the landscape vulnerability to the type of development proposed, without undue consequences of the maintenance of the baseline situation and/ or the achievement of the landscape planning policies and strategies. In this case, important aspects of the landscape baseline, including the presence of important landscape features such as those found in the veteran trees, are not acknowledged. Therefore, it is not surprising that the assessment understates the likely adverse effects arising from the proposals.

The overall landscape sensitivity is said (within the LVIA) to be derived by 'combining landscape condition, landscape value, character sensitivity and effects on landscape elements and landscape visual sensitivity', yet the GVLIA advises that the sensitivity of landscape receptors, while similar to the concept of landscape sensitivity used in the wider arena of landscape planning, is not the same, as it is specific to the particular project that is being proposed and location in question. Landscape receptors sensitivity should be assessed by '*combining judgement of susceptibility to the development proposed and value attached to the landscape receptor*'.

The report goes on to identify the landscape receptors as '*being the landscape character of the site and local area surrounding the site but also landscape elements such as trees and hedgerows etc*', but the effects on these as individual features are never considered.

Viewpoints have not been agreed with the LPA and there is no inclusion of photomontages to illustrate the level of change expected. Of particular relevance is the change to the character of Langhurst Wood Road and walkers walking through it to connect into PRoW 1574. Further, viewpoint 5 doesn't appear to show the worst case scenario, as it is clear that receptors will have open views towards the site through the gap between Pondtail Cottage and the southern parcel. Equally, there appear to be other instances along Langhurst Wood Road, including where vehicular access points are proposed that will change the character of the view significantly, and no viewpoints are identified or photomontages produced to illustrate the level of change.

- Additional viewpoints are required as follows:



- V1: At the junction of Mercer's road and Langhurst Wood Road



- V2: Looking south towards the northern part of the development from Langhurst Wood Road



- V3: Looking east from Mercer's road and PRoW 1574



- V5: Adjusted to show more of the site as per the screenshot below. Please note that Type 3 visualisations are required for this viewpoint to illustrate the level of change.



The photograph and panorama below are taken from a site visit on 16th April 2025 and illustrates how open the site is and how the change will be significant with little in a way of mitigation proposed. The photomontages will help understand the level of effect and mitigation measures required to reduce this or effectiveness of the proposals.



To this effect the conclusions of the report are considered unsound and some examples of issues found are given below. Please note that the following examples are not exhaustive:

- a. The site is located in the parish of North Horsham, not Warnham.
- b. The site assessment section is not thorough, and as highlighted above, it does not refer to key landscape features, even though these are identified within the landscape character guidance and being representative of the character area.
- c. Although reference to some of the published character assessments has been included within the report, such as the National Character Assessment and Horsham District Landscape Character Assessment, no reference is made to the middle tier of the guidance, the West Sussex landscape character assessments, or the Horsham District Capacity study (although this study is referred to later on in the assessment of effects section)
- d. No conclusions on the site's representativeness of the character guidance are drawn within the report
- e. Landscape Quality/Condition
 - i. We would judge this as **Medium/High** (based on the table A presented in the methodology) as opposed to **Medium**, as most of the landscape elements remain intact, notwithstanding the detracting elements such as road noise, brickworks and railway.
- f. Landscape Character Sensitivity
 - i. This is judged as **High** as opposed to **Medium**, as the indicators exceed the Medium criteria. While manmade influence such as noise from the A264 and brickworks is evident, on the whole there is a sense of remoteness and wildness on site with no evident movement. In addition, there are strong vegetation features, such as the field, veteran and notable trees of high susceptibility to change and a watercourse, indicative of the P1 Valleyside character which contributes to the sensitivity of the landscape.
- g. Landscape Visual Sensitivity
 - i. This is judged as **Medium** as opposed to **Low**, due to routes with some degree of focus on the landscape.
 - ii. We highlight in particular that PRoW 1574 has not been assessed correctly and is only regarded as a road rather than as a part of the local footpath network.
 - iii. PRoW 1574 and Langhurst Wood Road, used in part to connect to PRoW 1421, offer extensive views onto site. PRoW 1574 has a high focus on the landscape, minus the aforementioned noise detractors.
- h. Magnitude of Landscape Impacts
 - i. This is judged as **Large** as opposed to **Medium**, as the proposed development causes a total and permanent alteration and is uncharacteristic when set within the attributes of the receiving landscape.
 - ii. The assessment considers that the presence of future major development to the east is likely to affect the existing baseline conditions, yet what these are likely to be is not actually described.
 - iii. Moreover, as this is not yet built, it should also be considered and assessed as part of the cumulative landscape and visual effects but there is no cumulative effects section within the assessment.
- i. Overall Landscape Character Effects
 - i. As a result of the above judgements, this is concluded as **Major adverse**, as opposed to **Moderate/Minor**.
- j. Overall Residual Visual Effects

- i. We note there is no conclusion for this within the assessment. This should be judged as **Major adverse** resulting from the high receptor sensitivity on PRow 1574 and Langhurst Wood Road and very large magnitude of visual impact. This has potential to reduce on maturation of the scheme if an appropriate mitigation strategy is delivered.
 - ii. Viewpoint 5: We do not concur with the statement that, 'gaps in the roadside vegetation are rare' on Langhurst Wood Road as in reality a high degree of visibility is offered along the majority of its length abutting the site, as demonstrated by some of the photographs provided above. Furthermore, the proposals include various access points along Langhurst Wood Road which will expose development to view further, particularly without a robust mitigation strategy in place.
- k. Mitigation
- i. Embedded mitigation is discussed at para 6.4.
 - ii. The conclusion makes reference to implementation of the landscape strategy (which we assume refers to the embedded mitigation measures) and mitigation planting. Embedded mitigation measures are not all replicated within the proposed layout and it is unclear what mitigation planting is proposed. It is also unclear how the landscape proposals have been influenced by the findings of the LVIA. We cannot therefore conclude that the mitigation is appropriate for this proposed development.
 - iii. While the scheme provides some areas of landscape, these don't seem to create meaningful connections with existing landscape features in order to create a robust landscape framework that anchors the built environment into the receiving landscape.

4. Design Considerations

Notwithstanding the identified, combined residual major adverse landscape and visual effects, there is scope to integrate the scheme more successfully within the receiving landscape. Modification to the layout must be considered as priority, alongside a robust landscape mitigation strategy including enhancement of the boundary planting. While current proposals offer provision of tree planting, it is our judgement that these can be delivered more strategically in order to soften the appearance of the development while enhancing key landscape features. The following design considerations should be addressed:

a. Enhancement of Landscape features

As per the planning management guidelines stated under point 2c, we expect the provision of:

- i. small wetland areas
- ii. new streamside woodlands and marsh, particularly alongside the watercourse and Notable T87
- iii. willow planting
- iv. bold native woodland and hedgerow planting - greater than currently proposed. We recommend the former particularly alongside the site boundaries, AW and priority woodland, the latter alongside roads and footpaths adjacent to existing vegetation, as opposed to flowering lawn mix.
- v. Strengthening of existing landscape boundaries, including but not limited to the boundary of the southern parcel with properties along Langhurst Wood Road.

b. Retention of Landscape features

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 in line with aspirations stated within the DAS, particularly along Mercer

Road and the 'southern woodlands' area. The layout therefore must be amended to demonstrate no encroachment with the RPAs of B category Notable T87 with high landscape value, C category T89 of moderate landscape value, B category T103 of high landscape value, C category T69, B category T96, B category T110, B category T111 and G4 woodland. We highlight in particular possible changes to the road layout to minimise loss of mature trees and vegetation. For example:

- i. The eastern access road to the northern parcel could be shifted further south in order not to encroach the RPA of T96.



- ii. We recommend relocating the associated pump house to be within the triangular parcel adjacent to the housing, in order to minimise earthworks and utilities in proximity to the woodland, providing space for a more substantial vegetated buffer.



- iii. 2no. vehicle access routes are proposed along the south of Mercer Road, as well as an additional 5no. pedestrian access routes, resulting in tree and vegetation loss as well as RPA encroachment. We recommend that this is reduced to 1no. vehicle access route and a maximum of 2-3no. pedestrian access routes in order to prevent unnecessary vegetation loss and indirect adverse effects to mature vegetation which may result in vegetation deterioration and loss, at odds with aspirations stated within the DAS.



- iv. The pump station in the south-west should be relocated, as above, in order to retain the mature, established boundary vegetation.



- v. Given the undulating landscape form, an earthworks/levels plan must be submitted in order to ensure that the development is assimilated naturally within the landscape. Dramatic changes in topography will be resisted as they may give rise to further adverse effects on the receiving landscape.

c. Land use

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), areas measurements, and also demonstrate that accessible standards and distance buffers are achievable.

The land budget plan must also include a table indicating how much space is attributed to each category and how the scheme meets the overall open space requirement.

Below is a table with the requirements generated by this size of development. Particular concern is raised with the quality of the 'open space' areas indicated within the masterplan and whether these meet the various requirements within each typology as indicated above. For a site of this size, we would also expect the provision of a Neighbourhood Equipped Areas of Play (NEAP) instead of a LEAP, which must include elements suitable for young people that are inclusive and designed with girls in mind – see '[Make Space for Girls](#)' for resources. It is also likely that due to distances there is the need for a LAP in addition, particularly in the northern parcel of the development.

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 1.8m ² per person	Multi-functional greenspace 43.9m ² per person	Children and young people 0.7m ² per person	Parks and Gardens 13.8m ² per person	Amenity Greenspace 5.8m ² per person	Natural and Semi-Natural 24.3m ² per person	Children 0.5m ² per person	Youth areas and facilities 0.2m ² per person
304	729.6	1.8	43.9	0.7	13.8	5.8	24.3	0.5	0.2
0	0	1313.28	32029.44	510.72	10068.48	4231.68	17729.28	364.8	145.92
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
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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 (m ²)		1313.28	32029.44	510.72	10068.48	4231.68	17729.28	364.8	145.92
Area required for each typology (hectares)		0.131328	3.202944	0.051072	1.006848	0.423168	1.772928	0.03648	0.014592

- d. Please mark 15m AW buffer on all plans. AW is classified as an irreplaceable habitat and is highly significant to the landscape character and ecological function of the area, therefore its long term retention must be demonstrated. Please refer to government guidance on direct and indirect effects of development on AW, such as increasing levels of light pollution, noise and vibration, which contribute to its deterioration and loss.
- e. A landscape strategy or concept plan should be submitted to identify land use and function, clearly demarcating public open space, strategic landscape buffers, AW buffer, SuDS, play provision, and the residential development areas. We note current proposals suggest mixed use, however this may cause potential conflict. For example:
 - i. The importance of AW centres on protecting the undisturbed soils that form the irreplaceable habit, including within the buffer zone. Given the irreplaceable nature of this sensitive landscape feature, increased activity and access is not advisable and therefore should not be designated and counted towards recreational space. This is also highlighted within the DAS, in order to, 'preserve its biodiversity credentials and protect the woodland edge setting'.
 - ii. We recommend that not all open spaces are designated for meadow, and that there should be a greater provision of amenity grassland area managed with a regular mowing regime. This is to provide opportunity for informal play/picnics and safeguard the retention of the wider meadow closer to the more sensitive boundaries of the site.
 - iii. Where meadow is proposed, please ensure mown paths are detailed for relevant pedestrian access where applicable. In addition, signage delivered to educate future residents on meadow appearance, management, and general need for meadows in landscapes is desirable.
- f. As referenced above, connection of green spaces with the landscape boundaries through the layout must be further explored to create a robust landscape framework.
- g. The diversion of the public right of way while supported, must consider a softer route, both in its geometry and surfacing material, surrounded by soft landscape, to create a more pleasant setting and mitigate the adverse effects on the users of the PRow.

5. Hard and soft landscaping

- a. Service runs must be considered from the outset so that the tree planting is not diluted later on in the process. Service runs should be indicated in the landscape strategy to demonstrate that it can be delivered.
- b. Currently no trees proposed are greater than 14-16cm girth. Please amend proposals to indicate a range of sizes, including 20-25cm girth trees as well as 30-35cm girth trees at key strategic locations to aid with the site's legibility.
- c. In line with Woodland Trust guidance, species within the AW buffer should be native in order to increase ecological connectivity and form a resilient landscape. Please consider replacing non-native species in this location with key AW species such as *Sorbus torminalis*.
- d. Subject to amendments based on enhancement and retention of landscape features (points 4a and 4b), greater tree provision is requested to the immediate north of parking space runs in the northern parcel, in order to minimise light pollution on the adjacent AW, which may result in its deterioration as discussed above.
- e. Please amend the planting schedule to accurately portray all species within the scheme. We highlight in particular the absence of climbing species as indicated within the legend, and marginal/aquatic species such as *Iris pseudacorus*, *Typha latifolia*, *Juncus effusus* and *Carex riparia*.
- f. We recommend introducing more flowering species within this mix as well as adjusting the proportionate numbers, given the vigorous growth of some species selected, such as *Iris pseudacorus*.
- g. Please amend the PRow diversion and the footpath in the central open space to reflect a softer, permeable surfacing in order to minimise harm to the rooting medium of existing mature trees and to better reflect the rural character of the location.
- h. We strongly recommend that the hardscaping material palette is revised to introduce permeable treatments, given the sloping form and the numerous waterbodies on site which are at risk of deterioration as a result of polluted surface water runoff. For example, we recommend a permeable treatment for car parking spaces, particularly in proximity to existing mature trees.
- i. We expect to see a greater provision of seating across the site than currently proposed. Please include further seating within the central open space and within the open space adjacent to the piazza along Mercer Road.
- j. The piazza needs further consideration and integration with the landscape proposals to create a more pleasant space that residents can enjoy.
- k. HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting, including play equipment.
- l. We note 'Knee rail fence' in the legend however it does not appear within the scheme. Please amend accordingly.
- m. Please note rear garden boundaries facing the public realm are expected to be brick, which includes some detailing for interest.
- n. Please add a boundary treatment for the pumping stations, preferably in combination with planting in order to soften their appearances.
- o. Please submit specification for all boundary treatments.

6. SuDS

- a. We expect to see drawings and levels for the SuDS proposals. Attenuation basins should blend aesthetically into the surroundings and must not look like steep sided engineered structures. We recommend introducing varied depths using a combination of shelves/benches with a max 1:3 slope in between.

- b. The ground contouring, inlet and outlet design should be carefully considered to maximise the amenity value.
- c. We recommend blue green roofs are introduced to ancillary structures such as bin and cycle stores. If proposed, we expect to see details within a plant schedule and specific maintenance within the LMMP.
- d. Concern is raised with the positioning of part of the play equipment on top of the underground attenuation tank, please review.

7. Lighting

- a. Given the rural character of the location, existing landscape features such as field trees and woodland, and abutting irreplaceable AW, all of which can be lost or deteriorated due to increasing levels of light pollution, light spill must be considered sensitively so as not to cause potential adverse effects on the landscape character. Based on guidance from SDNP Dark Skies Technical Advice Note Version 2 and The Bat Conservation Trust guidance note 08/23, we expect the provision of an external lighting plan and recommend the following to mitigate adverse landscape effects in regard to external lighting in a countryside location:
 - i. 3000Kelvin or warmer
 - ii. 500 Lumens or below
 - iii. Where appropriate, use of motion/proximity sensors and set to as short a possible a timer as a risk assessment will allow. For most purposes, a 1 or 2 minute timer is appropriate.
 - iv. Horizontally mounted luminaires with no light output above 90° and/or no upward tilt.

8. Play Areas

- a. Please refer to the OSSR for guidance on the design of the play spaces. Please note these must be integrated within landscape areas and include tree and feature planting. We recommend that species are selected with extended seasonal interest and that release fragrance when disturbed in order to fulfil the objective of sensory play.
- b. We recommend the inclusion of informal sheltered seating.
- c. Please note that the space is expected to include areas with an all-weather treatment, such as wetpour, for all year round use.

9. LMMP & Landscape Specification

- a. Please amend the Specification to reflect that 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, plants must be grown and sourced in the UK at minimum due to the countryside location and therefore greater risk in regard to biotic threats.
- b. We advise against the harrowing, ploughing, ripping and rotary cultivation of undisturbed topsoil as it gives rise to adverse effects on the soil microbiome, thereby limiting successful plant establishment. Where fertility needs to be improved, the addition of imported topsoil and/or compost in line with BS is recommended. Please amend section 3.17 of the Specification.
- c. Please amend section 6.2 of the Specification to include the following: For tree stock used in proximity to Ancient Woodland, please ensure only locally sourced planting stock is used from suppliers of accredited UK Sourced and Grown stock, in accordance with Woodland Trust guidance. Supplier information must be made available upon request.

- d. Please note that we recommend that backfill should replicate existing soil profile by using soil excavated from planting pits, only amended with imported soils if necessary. Please amend sections 6.7 and 6.8 of the Specification.
- e. Please amend section 7.1 of the Specification and 8.19 of the LMMP to reflect that a 120mm collar should be left free of mulch to prevent the stems/trunks from rotting.
- f. Please note that we strongly recommend that artificial fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed waterbodies, woodland, ditches, hedgerows and the protection of their ecological features.
Alternative methods for weeding should be considered such as hot foam or hot water systems which are effective for large areas of land, meadow preparation and hard landscaped areas. Steel brushing in combination with acetic acid spraying, or electronic control systems are also effective in hard landscaped areas and suited to dealing with invasive species. Please note that specialist measures are required for removing plant species listed within the following [government standard guidance](#), such as the Heracleum mantegazzianum currently on site.
Please amend the following sections accordingly to remove mention of artificial fertilisers and herbicides, and reflect alternative methods as above or hand weeding alone by careful digging or selective scything: 1.13, 3.14, 8.6, 8.16 & 9.2 of the Specification and 7.4, 8.16 of the LMMP.
- g. Please provide information on watering regimes for successful establishment, as 'as required' is not sufficient detail. Please amend section 9.3 of the Specification and/or refer to section 12 of the LMMP.

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.

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	25/04/2025
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	29/05/2025 18/09/2025