

## Landscape Response to post-application comments

### Outline Planning Application for 45 dwellings on Land To The West of Shoreham Road, Small Dole (Ref: DC/25/1019)

Date: 17 October 2025

Project No. 403.V61782.00001

## 1.0 Introduction

- 1.1.1 In June 2025, Wates Developments Limited (Wates) submitted an “*Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access*”.
- 1.1.2 This note seeks to address the landscape comments received from the South Downs National Park Authority (SDNPA) on the 18<sup>th</sup> of September 2025 and Place Services on behalf of Horsham District Council (HDC) on the 26<sup>th</sup> of September 2025.
- 1.1.3 These landscape responses follow the terminology and guidance set out in the Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013, also known as GLVIA3, produced by the Landscape Institute and Institute of Environmental Management and Assessment), the Landscape Institutes Technical Guidance Notes and Clarifications on GLVIA3 (2024-01), and Technical Guidance Note 02/21.
- 1.1.4 This response has been prepared by a chartered landscape architect and has been discussed and agreed with another experienced chartered landscape architect. Both landscape architects have visited the site, covering both summer and winter conditions.

## 2.0 South Downs National Park Authority Comments (18<sup>th</sup> September 2025)

- 2.1.1 These comments provide a review of the policy associated with National Parks followed by a number of comments on the proposed development. All of these comments have been evaluated and the following section seeks to address any concerns raised.
- 2.1.2 Paragraph 4 on page 2 recognises that development has been located on the lower ground within the site to minimise views of the development from the South Downs National Park (SDNP). That is correct – by doing so the potential visibility of the proposed new homes from viewers in the SDNP can be reduced. It also reduces the visibility of the new homes from residents on North Hall Lane. The proposed positioning of the new homes also allows the retention of open views from the



proposed new open space at the northern edge of the site towards Truleigh Hill in the SDNP – a view which is not currently publicly available.

2.1.3 However, the SDNPA's response goes on to state that "*development may have been better focused on the eastern side of the site, closer to Henfield Road, in order to form more of a continuation of that existing settlement rather than an almost isolated projection of built form extending out to the west*". In response to this point we note that firstly, the development parcel is located adjacent to Henfield Road, and to this extent would be seen as a logical extension of the existing settlement. However, it is recognised that the new homes extend westwards from Henfield Road; this is simply in order to respect local topography and ensure that new homes are placed on lower ground as discussed above. Placing homes on higher ground, at the east of the site has been tested with computer modelling and resulted in greater visual effects within the SDNP itself. We have therefore concluded that the proposed layout provides the best overall solution, minimising landscape and visual effects whilst also maximising the visual connections with the SDNP from new public realm.

2.1.4 Paragraph 5 on page 2 states "*The proposal includes open space and on-site delivery of Biodiversity Net Gain, and we would recommend that the advice of an ecologist is sought with regard to whether the proposed planting and management can deliver contextually appropriate (ie informed by the site's local ecology and native plant species) enhancement for the wildlife and habitats of the SDNP*". Ecological input into the design has been sought throughout the design process ensuring that the proposal enhances the site's ecological and biodiversity value. This input would continue during the detailed design stages, ensuring that species mixes and management plans are suitable in both the site's context and to achieve the desired habitats.

2.1.5 Paragraph 6 on page 2 states "*The South Downs National Park is a designated International Dark Sky Reserve and dark skies and tranquillity are two of the National Park's Special Qualities that need to be protected from harmful development. Paragraph 198(c) of the NPPF outlines that development should limit the impact of light pollution on intrinsically dark landscapes and nature conservation*". The proposed development would be sensitively designed to limit lighting levels and light spill, which would be resolved at the detailed design stage by a special lighting consultant.

### **3.0 Place Services Comments (26<sup>th</sup> September 2025)**

3.1.1 These comments provide a review of both the landscape design and Landscape and Visual Appraisal (LVA). All comments have been carefully reviewed and for



those that raise potential issues or concerns, the following section provides either further clarification or details of additional work or layout amendments carried out.

### **Landscape and Visual Appraisal (LVA)**

3.1.2 We are pleased to note that it is considered that the LVA is “*conducted in accordance with the principles outlined in the ‘Guidelines for Landscape and Visual Impact Assessment’ Third Edition (GLVIA3)*”.

3.1.3 In response to paragraph 2 of this section, the LVA has been updated to refer to the correct, latest, indicative site layout (drawing 23088 - C101F).

### **Landscape Character**

3.1.4 Paragraph 1 of the Landscape character section on page 4 of Place Services comments states that “*We do not consider the use of designations as an appropriate ‘starting point’ for assessing Value*”. Paragraph 5.19 of GLVIA3 states that “*A review of existing landscape designations is usually the starting point in understanding landscape value, but the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape – such as trees, buildings or hedgerows – may also have value. All need to be considered where relevant*”. The LVA adheres to this method; firstly, recognising that the site is located within the setting of the South Downs National Park (SDNP) and then taking into consideration further elements through the approach of Table 1 of TGN 02/21 “*Assessing Landscape Value*” (table D1 within the LVA).

3.1.5 Paragraph 2 of the Landscape character section on page 4 of Place Services states that “*Table D1 assesses value of the natural heritage as ‘community’ noting that..... ‘there 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)*”. It has been recognised that table D-1 should have stated ‘*There are no ecological designations within the site or its immediate vicinity*’. The well-established hedgerows and trees along the site’s boundaries have been taken into consideration, hence why the value is not low or community/ low, and it was not deemed appropriate for the value to be greater than community given that there are no ecological designations within or nearby to the site.

3.1.6 We are pleased to note that Place Services approve of our SDNP setting assessment and are in agreement that the site is within the setting of the SDNP.

3.1.7 We are also pleased to note that Place Services generally “*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**

3.1.8 Paragraph 1 of the Landscape character section on page 4 of Place Services comments states that “*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". The plant growth within the photomontages is based on paper 'Predicting tree and hedge growth' by Chris McDermott published on the IEEMA website. This guidance is recommended to be used for predicting the effectiveness of mitigation and particularly notes its use for photomontages. From this guidance the following heights were stipulated; Year 1: Woodland and hedgerow plants at 60-80cm in 60cm tubes and individual trees at 2.5-3m. Year 15: Woodland planting at 7.5-8m, hedgerows at 2.5-3m and individual trees at 8-10m.

3.1.9 Paragraph 2 of the Landscape character section on page 4 of Place Services comments states that "*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*". In response to these concerns, the following type 2 illustrative photo-wireline has been produced, showing the potential view from the north-western corner from the site (see **figure 1**, below).



**Figure 1: Type 2 Illustrative Photo-wireline from the elevated ground within the site. This image combines a photograph (taken from the north-western corner of the site in winter 2023) with an accurate computer model of the proposed development, using existing houses, landforms and vegetation as reference points.**

3.1.10 This wireline demonstrates that if the proposed development were to go ahead, a clear view of Truleigh Hill, within the SDNP, would be available from the public open space above the proposed intervening dwellings. Therefore, the inclusion of a framed view was not deemed necessary.

3.1.11 It is also worth noting that the proposed 2-storey apartments were located in the south-eastern corner to ensure ample vegetation is proposed at the site entrance,



limiting visual effects through the vehicular access. The apartments would also ensure that there would be sufficient surveillance over the open spaces to the north and east. As demonstrated within the LVA, careful shaping of the proposed development has already been carried out; the proposed dwellings are located on the lower ground within the site and both existing and proposed vegetation would help to mitigate landscape and visual effects on the South Downs. Consequently, effects are at most Moderate and would always reduce overtime, often to Neutral by year 15.

### **Parameter Plans**

3.1.12 In response to Place Services comments, Parameter Plans have now been submitted as part of this application. These include;

1. Land Use
2. Building Heights
3. Green Infrastructure

### **Layout and Landscaping**

3.1.13 A number of Place Services comments in this section relate to detailed layout considerations that would be addressed at a later stage, but notwithstanding that and as set out below, some amendments have been made to the illustrative layout and would be further addressed through the subsequent Reserved Matters application. The Parameter Plans produced should also provide reassurance on some of these points.

3.1.14 Place Services first point refers to *“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”*. In response, we have updated the layout to incorporate a foraging trail rather than an orchard.

3.1.15 Regarding point two, *“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 have taken on board concerns that these may be detracting features and in response have relocated these to the northern extent of the POS. This adheres to HDC’s Ecology/ BNG response which suggests that the allotments should be moved further north to prevent fertilisers and herbicides getting into the watercourses. We also had concerns that by locating the allotments within the development parcel they would have limited space and could potentially be overshadowed by the dwellings.

3.1.16 In response to the third point *“the proposed car parking on the edge of the POS undesirable and expect these to be accommodated further south”*, the four visitor



parking spaces to the north of the development have now been relocated further south within the development parcel to take on board this comment.

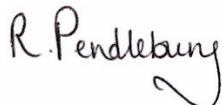
3.1.17 Point four states "*There is a missed opportunity to provide connectivity with the wider landscape to the south where PRoW 2774 1 extends beyond the site boundary*". We agree that it would be beneficial to provide a link into the footpath to the south. However, as this footpath is located on third-party land this is constrained but could be explored at the Reserved Matters stage (please refer to i-Transport's response note dated the 11<sup>th</sup> of September 2025 for further details).

3.1.18 Place Services fifth point states "*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*". We are grateful for these suggestions, however, much of these finer details would be determined at Reserved Matters. Although, it is worth noting that rain gardens are already proposed within front gardens and the latest indicative site layout has been amended to make these features clearer and increase the number of these.

3.1.19 Place Services final point states "*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*". We acknowledge that further planting could be incorporated within the street scenes and in response further work on the proposed street planting has been carried out and reflected on the latest indicative site layout. However, further details such as sections would be provided at Reserved Matters.

We trust that these responses, amendments and additional work demonstrates that all of the comments received have been thoroughly reviewed and where possible actioned, and hopefully any remaining concerns have been addressed.

Kind Regards,



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