



Horsham District Council  
Parkside  
Horsham  
West Sussex  
RH12 1RL

Date: 10 October 2025  
Our ref: 09838

For the attention of: Planning Department

**Application ref:** DC/25/1269  
**Location:** Land North of Guildford Road Bucks Green Rudgwick West Sussex  
**Proposal/Description:** Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.

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

## Summary

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

This response is based on a desktop study, review of the submitted documents and a site visit carried out on the 19/09/2025. Our Landscape comments are as follows:

### Site Context:

The site is a 4.41-hectare parcel of gently undulating pastoral land located on the south-western edge of Rudgwick. It comprises two fields separated by a belt of mature trees, with additional scattered trees throughout. The boundaries are well-defined by mature trees and hedgerows on the western, southern, and eastern sides. The northern boundary is open to the wider agricultural elevated landscape to the north.

Surrounding land uses include agricultural areas to the north and west, the south features a mix of residential and commercial development along Guildford Road. Residential properties also back onto the south-eastern boundary. To the east, the site borders playing fields belonging to Pennthorpe Preparatory School.

Access is currently via Lynwick Street, and a public footpath (Footpath 1386) runs internally along the eastern boundary, connecting Guildford Road to Lynwick Street near Canfields Farm.

### **Planning Policy Context:**

#### Horsham District Planning Framework

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

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

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

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

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

As of October 2025, the Horsham District Local Plan (Regulation 19) is 'submitted' and is regarded as relevant. The site is subject to draft allocation RD1: Land North of Guildford Road and is covered by Strategic Policy HA14: Rudgwick and Bucks Green which sets that the site will be allocated for up to 60 homes and states:

2. As adjacent sites, the Council would support RD1 and RD2 coming forward as a comprehensive scheme.
3. In addition to meeting national and Local Plan requirements, development will be supported where proposals:

### **RD1**

- a) Are limited to the southern part of the site as shown on the Policies map, with an agreed landscape treatment in the northern part of the site to minimise landscape impacts
- b) Ensure that appropriate regard is had to the impact on nearby Grade II Listed Buildings (Fox Inn, Guildford Road and The Old Cottage and Field Cottage, Lynwick Street).

Further Policies include:

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

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

#### **Strategic Policy 14: Countryside Protection**

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

#### **Strategic Policy 16: Protected Landscapes**

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

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

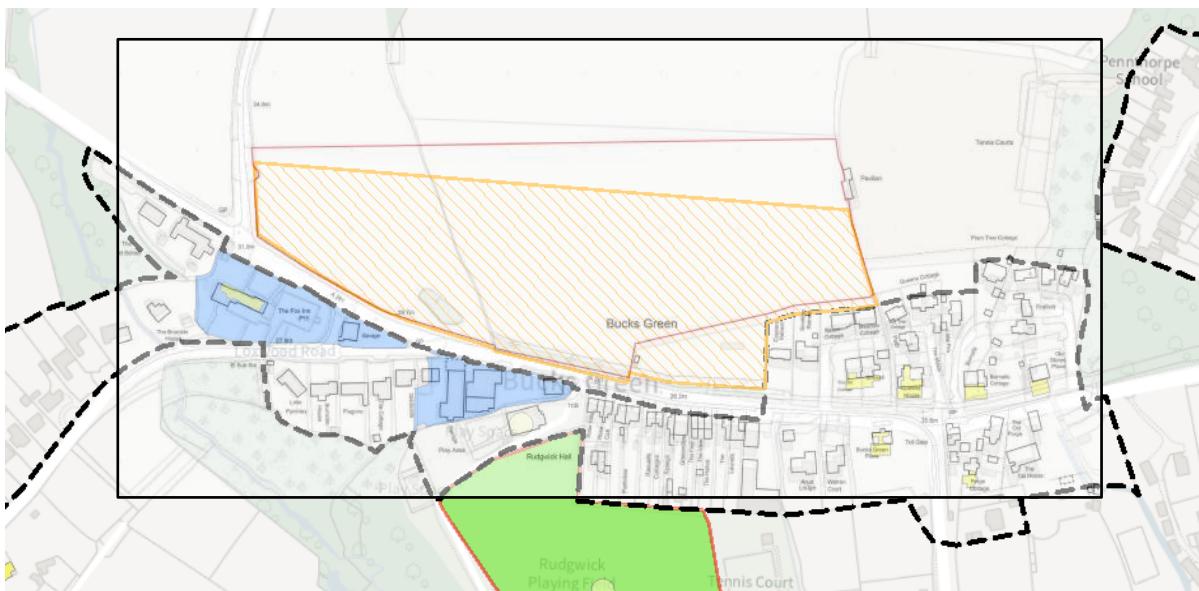
This policy promotes the enhancement of green infrastructure and biodiversity. It now requires a 12% biodiversity net gain and encourages developments to contribute to multifunctional landscapes that support ecology, recreation, and climate resilience.

#### **Strategic Policy 20: Development Principles**

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

## Review of the proposal/submitted information:

Upon initial review, we note the application extends beyond the draft allocation boundary as shown within the overlay from the Location Plan (Dwg. SLP.05 Rev. A) on the Horsham District Local Plan 2023-2040 Regulation 19 below:



Furthermore, the Land Use Parameters Plan identifies the developable area extends into the northern part of the site, contrary to Policy HA14 which states that *“development will be supported where proposals: a) Are limited to the southern part of the site as shown on the Policies map, with an agreed landscape treatment in the northern part of the site to minimise landscape impacts.”* In addition of the extension into the countryside beyond the RD1 draft allocation, the policy has not been adhered to regarding the developable area.

### Landscape Visual Appraisal (LVA)

The application is accompanied by a Landscape and Visual Appraisal (LVA) prepared by Scarp Landscape Architecture Ltd. Overall, the LVA methodology is in accordance with the principles outlined in the ‘Guidelines for Landscape and Visual Impact Assessment’ Third Edition (GLVIA3), published by the Landscape Institute (LI); although how the judgments within the assessment have been made lacks clarity.

Para 1.1.3 incorrectly states that *“The application site (“the site”) corresponds with the RD1 allocation site.”* As previously stated, the site does not correspond with RD1 draft allocation.

Para 7.1.2 of the LVA states: *“The appraisal excludes consideration of effects associated with construction works as these would be small-scale and temporary in nature.”* We disagree that construction works will be small-scale given the size of the application. Furthermore, given the location of Public Rights of Way (PROW) footpath RUD-1386 along the eastern boundary, we would expect effects at construction to be assessed.

### Landscape Character

It is understood that two landscape receptors have been identified and assessed: 'Effects on the Physical Landscape' (section 7.3) and 'Effects on Landscape Character' (section 7.4). It is difficult to follow the assessment approach on these individual receptors and the conclusions are not clear. Summary tables will provide a better understanding of overall effects and how these are reached and is supported by GLVIA3 as best practice (Chapter 5).

Section 7.2 of the LVA states that "*The site and local landscape is considered to be of medium/high sensitivity based on its medium value and medium/high susceptibility to change.*"

Para 10.1.6 concludes that "*The Development would result in a high magnitude of change to the site landscape but an overall low magnitude of landscape change to the local part of LCA I1 (Rowhook and Rudgwick Ridge) at both Year 1 and Year 15.*"

To ensure a concise assessment in accordance with GLVIA3, each receptor should be assessed individually with clear receptor descriptions and combined to provide clear approach towards conclusions.

### Visual Amenity

We note the assessment of visual receptors have been grouped into the following:

- Effect on views from the north
- Effect on views from the east
- Effect on views from the south
- Effect on views from the west

Similarly to landscape receptors, it is difficult to follow the assessment and final conclusions of individual receptors. We recommend summary tables to assist with clarification of findings.

Para 5.2.1 of the LVA describes the visual baseline of views from the north stating that "*Photographs 1 and 2, taken from the northern sections of this footpath, illustrate how (a) the views are dominated by pasture fields and (b) housing at Bucks Green may be seen at a relatively low level set amongst trees in the background.*" Para 8.2.1 states "*The new built form would be readily noticeable in the background and would be in character with existing views towards the settlement.*" Our site visit identified views of a well-wooded agricultural pastureland which is characteristic of the landscape. The views of Bucks Green settlement edge were limited from the representative viewpoints 1 and 2 as shown in photographs 1 and 2.

The overall magnitude of visual change for this receptor has been judged to be medium at Year 1 (winter), falling to low at Year 15 (summer) (para 10.2.2). Stating that “*The proposed vegetation belt would, by Year 15, have a strong visual presence and help achieve a high degree of visual integration for the new housing*”. We disagree that the proposed vegetation belt would be sufficient to achieve this level of visual integration. We have concerns regarding the ridgelines of the proposed new dwellings to the north of the site given that the topography of the site raises towards this boundary and the proximity of the built envelope to the boundary as it extends onto this elevated part of the site. We would welcome the submission of sections through the site and the northern boundary which demonstrate that this concern can be adequately mitigated by the proposed landscape scheme or reduction of building heights along this edge.

We do not agree with the combined approach of assessing winter views against summer views, instead these should be judged individually in line with para 6.28 of GLVIA3.

### Parameter Plans

The Land Use Parameter Plan (Dwg. LUPP-02 Rev A) sets out the ‘Developable Area up to 2 Storeys’ with sections of areas denoted to be ‘upto 2.5 Storeys’. The graphics set out for the 2.5 building heights is not a closed line and open to interpretation. Given the topography and visual effects identified within the LVA, we expect more detailed information regarding proposed parameters.

As previously mentioned, the developable area extends beyond the draft allocation and does not adhere to Policy HA14 which requires the northern part of the allocation area (not the northern part of the site area) to be an agreed landscape treatment.

We identify potential safety concern regarding the location of the play space and the SuDS basin on the entrance of the site. Where possible we prefer to encourage a mutli-functional approach towards open spaces and recommend revising the layout to accommodate accessible SuDS features incorporating play on the way. The provision of fencing would not be accepted.

The AIA identifies a large section of vegetation removal to accommodate the proposed primary access road to field 2. While we appreciate the location is planned to limit the loss, we query the extent. This tree line provides a strong historic landscape feature and should be better retained. Where this is not possible, we expect replacement quality trees to close this gap post construction.

### **Submission documents:**

1. Prior to approval we request Parameter Plans to be submitted and approved including:

- i. Developable areas
- ii. Building heights
- iii. Green Infrastructure

2. Following any approval, we expect the following to be submitted as reserved matters:

- i. Soft Landscape Plan
- ii. Planting Plan
- iii. Hard Landscape Plan to include boundary treatments
- iv. Landscape Management Plan

### **Summary:**

The proposals extend beyond the RD1 draft allocation boundary and do not align with Policy HA14 that requires development to be focused in the southern part of the site, with landscape treatment in the north to help reduce impact. While the accompanying Landscape and Visual Appraisal (LVA) broadly follows GLVIA3 guidance, some aspects, such as the omission of construction impacts and clarity around visual receptor assessments, could benefit from further refinement. In particular, the assessment of views from the north and the effectiveness of proposed screening vegetation need reconsideration and separating seasonal views would help improve transparency.

The Parameter Plans would benefit from clearer delineation of building heights and developable areas, especially given the site's topography and visibility from elevated land to the north. There are also opportunities to enhance the layout by integrating open space features, such as SuDS and play areas, in a more multifunctional way. The proposed access road involves notable vegetation removal, and where retention isn't feasible, replacement planting should be considered to maintain landscape character. Prior to approval, more detailed Parameter Plans are recommended; following approval, reserved matters should include comprehensive landscape plans and a management strategy to support long-term quality and integration.

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

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

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



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

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