HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land North of Horsham Old Holbrook Horsham West Sussex
DESCRIPTION:	Application for approval of Reserved Matters pursuant to Condition 5 of Outline Planning Permission reference DC/16/1677 for the extension of the Phase 1 Primary Road to Old Holbrook, landscaping, SUDS, ecological enhancements, substation, footbridge and the Sub Phase 1D Strategic Landscape Buffer. OPP accompanied by an Environmental Statement.
REFERENCE:	DC/24/0446
RE-CONSULTATION:	1st of comments in black 2nd set of comments in blue 3rd set of comments in green
RECOMMENDATION:	Modification / Holding Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

Modification is requested to secure the landscape strategy. Our chief concern is the layout of the road, cycle path and footpath which currently encroaches the minimum 15m width Ancient Woodland (AW) buffer zone. AW is classified as an irreplaceable habitat and is highly significant to both the character and the ecological function of the area. We recommend the route of the main road be altered to avoid the buffer zone in order to demonstrate the integrity and long term retention of the AW.

While the amendments now avoid the buffer zone, with thanks, we still note indirect effects of development on AW, based on government guidance. This includes increasing amounts of dust, light (see horizontal lux spread within Lighting Details), soil, noise and air pollution due to the road, and increasing damage via trampling of plants and erosion of soil by people accessing the woodland from the footpaths. While indirect, these effects may contribute to deterioration and loss of AW. As previously noted, AW is highly significant to the character of the area and is a key landscape feature which must be retained.

In addition, alternative locations for the temporary bus turning area have not yet been considered or demonstrated.

Further modification is required.

Any mitigation planting within AW is not acceptable on landscape grounds due to likely deterioration and loss of AW caused by maintenance access through existing AW. Mitigation planting must be located within or outside the AW buffer, as previously requested.

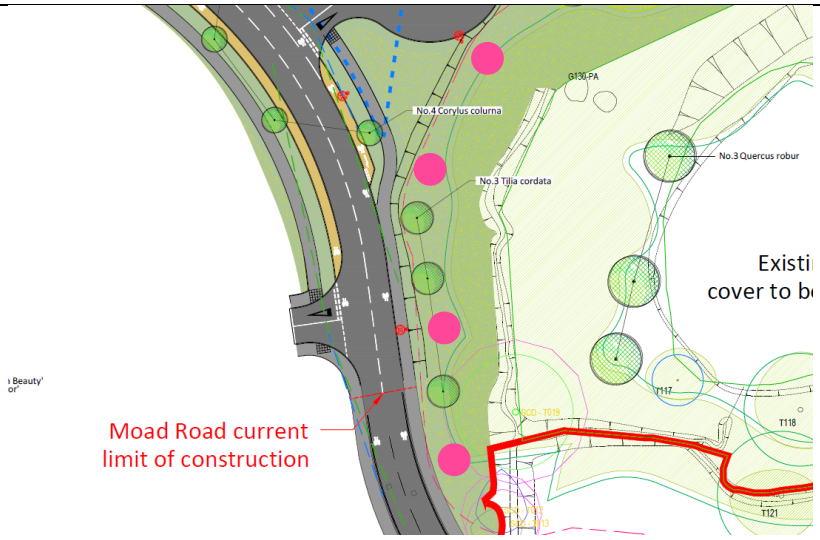
MAIN COMMENTS:

In addition to specific comments and recommendations made below, we request the following information prior to determination:

1. Plan demonstrating coordination of landscape proposals, tree planting and underground services. Not yet addressed. 2898-5-2-23-DR-001-S4-P11 does not include underground services. Notwithstanding, utilities do not appear to conflict with landscape proposals, therefore this is not required to be submitted on this occasion.

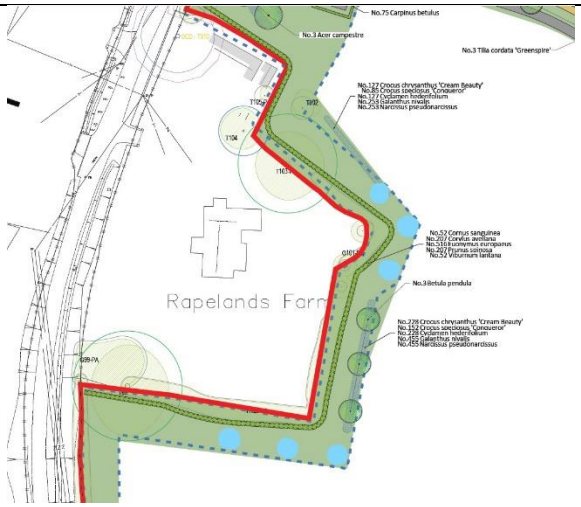
<u>Landscape proposals</u>

2. The AW buffer zone has not been clearly outlined in plan. We recommend including this detail as well as re-routing the main road, cycle path and footpath so as not to encroach the minimum 15m wide AW buffer zone as per government guidance. Addition of buffer in plan as well as re-routing of path has now been provided, with thanks.
3. The location of the temporary bus turning area, within the landscape buffer and in close proximity to the AW buffer zone, is not appropriate and needs to be reviewed. If the temporary arrangement is an essential requirement to facilitate the construction of this phase, we require its position be located to a less sensitive location. This location remains unsuitable on landscape grounds. Please demonstrate consideration of alternative locations. Not yet addressed.
4. For tree planting adjacent to the AW buffer zone, we recommend removing Tilia cordata 'Greenspire', Corylus colurna and Acer rubrum and replacing with trees listed within the revised planting palette under DC/24/0061. This is based on guidance from the Woodland Trust which recommends creating native woodland around ancient woodland to reverse fragmentation, thereby increasing ecological connectivity to form resilient landscapes. From a landscape perspective, the trees listed above are not local features within the I2 – Warnham and Rusper Wooded Edge and K2 – Warnham and Faygate Vale Landscape Character Areas from which the proposed site is located. Recommended alternatives such as Tilia cordata and Sorbus torminalis are found within the Landscape Character Areas and are also key ancient woodland species appropriate for the buffer location. Amendment to Tilia cordata is welcomed, however proposed Quercus robur within the pond area should be removed to prevent disturbance within AW via maintenance activities, and to allow for natural regeneration. As an alternative, there is opportunity for further planting within the AW buffer zone (see indicative areas in pink, below) to mitigate adverse effects as described in the summary of comments. Please consider key ancient woodland species such as Sorbus torminalis, as species diversity is necessary for resilient landscapes.



Not yet addressed. As previously noted, the newly proposed location requires planting and maintenance access through existing AW, thereby introducing further effects of development contributing to its deterioration and loss, which is of key landscape concern. Please relocate mitigation planting to the AW buffer, which will more likely achieve goals of maximising ecological integrity and resilience by diffusing effects from the road.

5. As above, based on recommendations from the Woodland Trust for sites in proximity to ancient woodland and for Landscape Character suitability, we recommend replacing Betula nigra with a specimen suitable for the conditions and commonly found in Horsham District, such as Salix alba. Not yet addressed. If Salix alba is deemed unsuitable, please consider alternatives as suggested above, such as Carpinus betulus or Sorbus torminalis. Closed, with thanks.
6. Drawings are requested for pond design, as recently submitted under DC/24/0061. Closed, with thanks.
7. Proposed headwalls cladded in Horsham stone are welcomed. Additional planting to further soften their appearance is recommended where possible for a naturalised approach. While concerns are raised in regard to maintenance requirements, screen planting for basin headwalls is proposed elsewhere within the Mowbray site, therefore is deemed appropriate for the location. Please see proposed planting schedule under DC/24/0917 for reference. Closed.
8. Given the design motives set out to provide separation/screening to the existing residential dwelling (Rapelands Farm) to the west, we recommend the planting of 6 additional trees as the 3 proposed are unlikely to be sufficient for this purpose. The suggestions in blue below, in addition to the hedgerow, will also have the benefit of re-enforcing the wooded character of the area.



Closed, with thanks.

9. Tree pit details, with the inclusion of root barrier systems for trees proposed in close proximity to hard landscaped/surfaced areas or equipment. Closed, with thanks.

Landscape statement

10. Section 3.6 suggests areas of meadow grass, however this is not detailed in proposals. We recommend its inclusion on the western boundary of the site, especially in proximity to the proposed pond, and within the AW buffer zone as a softer, more naturalised approach to amenity grass and as a clear, landscape edge. Closed, with thanks.
11. Please include note that strimmers are not to be used in proximity to trees in section 4.4. Closed, with thanks.

LEMP

The LEMP should be resubmitted as part of the application and the following amendments are requested: Not yet addressed. Not yet addressed.

12. Please remove all mention of herbicides and/or specify methods to hand weeding alone by careful digging or selective scything unless dealing with noxious and invasive non-native plant species listed under government standard guidance. For larger areas of land or for meadow preparation, alternative methods should be considered such as hot foam or hot water systems. In addition, chemicals including glyphosate should not be used in proximity to ancient woodland and ancient woodland buffer zones, waterbodies, ditches, hedgerow or scrub. Please modify the following sections: 4.37, 5.17, 5.22, 5.28, 5.34, 5.38, 5.52, 5.96, 5.113, 5.175, 5.179, 5.197, 5.200 and 6.4. The plan schedule should also be updated accordingly. Not yet addressed. Closed in regard to Compliance Statement.
13. Please include specification that strimmers are not to be used in proximity to trees. Not yet addressed. Not yet addressed. We note your comment and would like to clarify that we're referring to strimming/grass cutting near tree trunks rather than strimming in general. Please include note in order to avoid damage to tree trunks.
14. As per 6.4, we request supplier information for plant stock in regard to ancient woodland buffer planting to ensure that it's locally sourced. This is in accordance with Woodland Trust guidance which states, *'Introducing planting stock always presents a risk to the genetic integrity of an ancient woodland and can risk introducing new pests and diseases. For this reason, only locally-sourced planting stock should be used, and only certain tree nurseries are suppliers of accredited UK Sourced and Grown*

stock.' Supplier information must be made available upon request, however this can be provided at a later date.

Landscape specification

15. As above, please remove all mention of herbicides and/or specify methods to hand weeding alone by careful digging or selective scything unless dealing with noxious and invasive non-native plant species listed under government standard guidance. For larger areas of land or for meadow preparation, alternative methods should be considered such as hot foam or hot water systems. In addition, chemicals including glyphosate should not be used in proximity to ancient woodland and ancient woodland buffer zones, waterbodies, ditches, hedgerow or scrub. Please modify the following sections: 168, 210, 212, 221, 300, 421 & 675. Alternate weed removal methods added with thanks, however herbicide application has not yet been removed. Please remove, 'non-residual herbicide to areas to receive planting' from section 168; 'Apply a suitable translocated non residual herbicide' from section 221; 'Suitable for supressing perennial weeds' from section 300; 'Apply a suitable herbicide at appropriate times' from section 421; and, 'At appropriate times treat with a suitable translocated nonresidual herbicide' from section 675. Not yet addressed, please provide updated Specification.
16. In section 920, please include, 'A collar of 10cm should be left clear of mulch to prevent trunks from rotting'. Closed, with thanks.

EMMP

17. Section 5.5.2 lists Butomus umbellatus (Flowering rush) as a marginal species, however it doesn't appear within the proposals. Please include to plans or remove from EMMP. Not yet addressed. Flowering rush features in sections 5.6.1 and 5.6.2 but not yet in proposals. Not yet addressed.
18. Section 5.5.2 states that a Grey willow will be planted on the south east corner of the pond however this doesn't appear within the proposals. Please include to plans or remove from EMMP. Not yet addressed. Grey willow features in section 5.6.2 but not yet in proposals. Please include. Not yet addressed.
19. Section 5.5.4 lists Hawthorn and Guelder rose as hedgerow species, however these do not appear in proposals. Please include to plans or remove from EMMP. Not yet addressed. Hawthorn and Guelder rose features in section 5.6.4 but not yet in proposals. Please include. Not yet addressed.

Lighting

20. Please note that lighting columns have not been included within the Street Lighting Layout Drawing for the temporary bus turning area. Updated plans not yet provided, otherwise closed.

RECOMMENDED CONDITIONS:

If approved, please add:

1. A condition that the temporary bus turning area is to be removed and returned to its previous condition within an appropriate timescale to be set within the wording of the condition. The completion of the works must be demonstrated in writing to the LPA and must include details of the work carried out.

2. An informative to the decision notice with the following details:

For plant 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.	
NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	02/05/2024 29/07/2024 16/08/2024
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	10/05/2024 20/08/2024