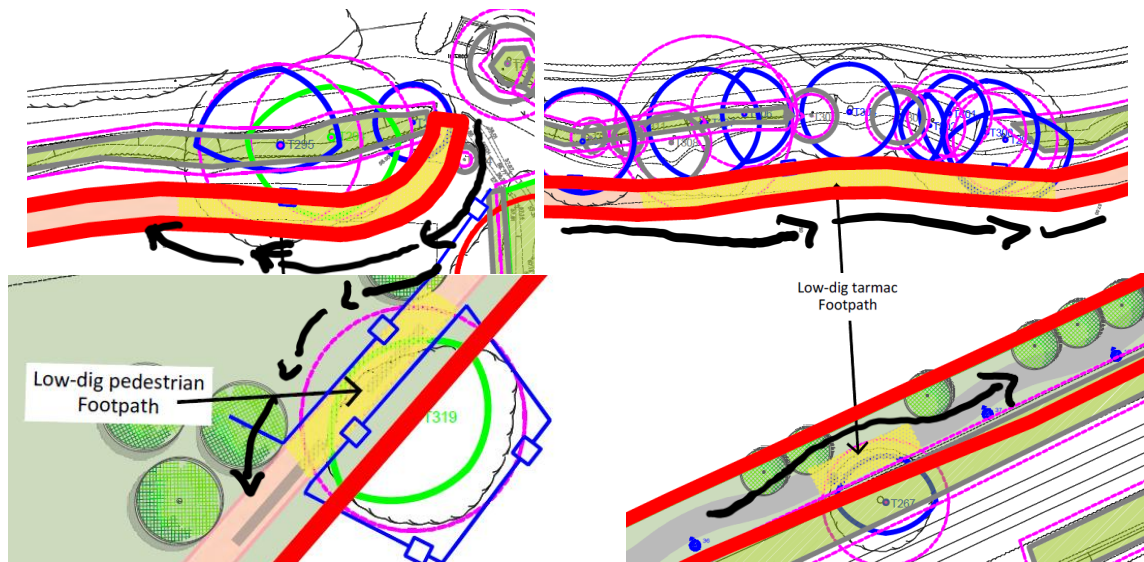




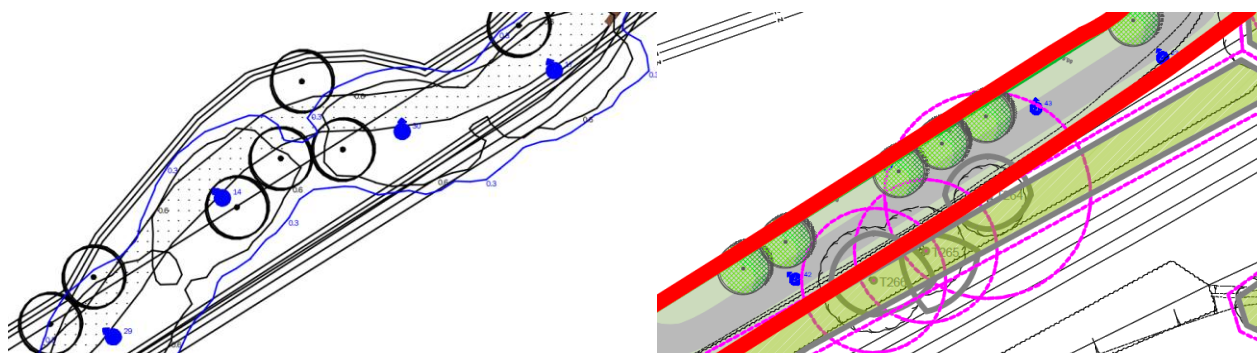
## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Horsham District Council – Planning Dept                                                                                                                                                                                                                                                                                                         |
| <b>LOCATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Land Parcel at 519887 133300 Rusper Road Horsham West Sussex                                                                                                                                                                                                                                                                                     |
| <b>DESCRIPTION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Construction of Primary Road from the Left-In, Left-Out junction with the A264 (constructed pursuant to Outline Planning Permission DC/16/1677) to Bush Lane (Bridleway 1585), footpaths and cycleways, foul and surface water drainage including a SUDS basin and foul pumping station, landscaping, substations and associated infrastructure. |
| <b>REFERENCE:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | DC/25/1543                                                                                                                                                                                                                                                                                                                                       |
| <b>RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Objection / Modification                                                                                                                                                                                                                                                                                                                         |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                  |
| <p>Concerned is raised with the changes between the parameter plan and the current proposals. These changes undermine the landscape strategy and importantly the existing green infrastructure, therefore they must be reviewed. The current scheme is not sensitive to its setting and does not assimilate naturally into the existing landscape.</p> <p>The significant proposed earthworks additionally result in loss of vegetation and in encroachment of root protection areas (RPAs), which are not accurately reflected in plan. As such, existing, mature landscape features are not being protected, conserved and enhanced, contrary to HDPF policies 25, 26, 31 and 33 (6).</p> <p>Please see detailed comments and recommendations below, which aim to support the delivery of a more balanced and landscape-sensitive design.</p> |                                                                                                                                                                                                                                                                                                                                                  |
| <b>MAIN COMMENTS:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                  |
| <u>Layout &amp; Levels</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                  |
| <ol style="list-style-type: none"><li>1. The proposed layout deviates from the previously approved parameter plan and results in major change to the green infrastructure, further resulting in the undermining of the mature hedge and treeline in the centre of the site, as well as the loss of a significant green corridor positive to the setting of these retained features. While the preference to bring the northern and southern parcels closer together is appreciated, it mustn't be at the cost to the existing well established landscape features and a middle ground must be found.</li></ol>                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                  |

2. The retention of existing vegetation is cited as integral to the proposals, with aims of retaining and enhancing green ecological corridors within the site being highlighted within the 3.6 of the LEMP.
3. We request that the layout is revisited in order to better align with the approved parameter plan and conserve the connectivity and thus resilience of the central mature hedge and treeline as well as the existing field boundary which also aligns with the current positioning of the PRoW. The existing landscape features (hedgerow and ditch) will provide a mature setting to the users of the footpath, and we are concerned as to the future relationship of the hedge with the development. Further, allowing the existing hedgerow to be placed within a green corridor, will strengthen its presence and understanding of the original landscape character and pattern. We note in addition that an over-delivery of 80 car parking spaces is proposed and thus there are opportunities to make space for proposals without negatively impacting the green infrastructure.
4. Given the undeveloped nature of the site, the RPAs must be entirely avoided in order to secure the retention and healthy conditions of key landscape features such as trees and hedgerows, as per the scheme's aims (see point 2).
5. As such, while the following examples adhere to minimum recommendations, the default position should be that development occurs outside of RPAs. We therefore request that footpaths and cycle paths are altered to avoid these areas. Please see examples below.



6. As above, in the example below, the original layout as reflected in the lighting plans is preferred. In any case, we note that 'low-dig' has not been indicated within the Tree Protection Plan (TPP) and must be amended accordingly.



7. Partial clearance of category A mixed woodland group W281 is proposed under 5.15 of the AIA, however, it has not been included within the tree survey, nor labelled in plan. We

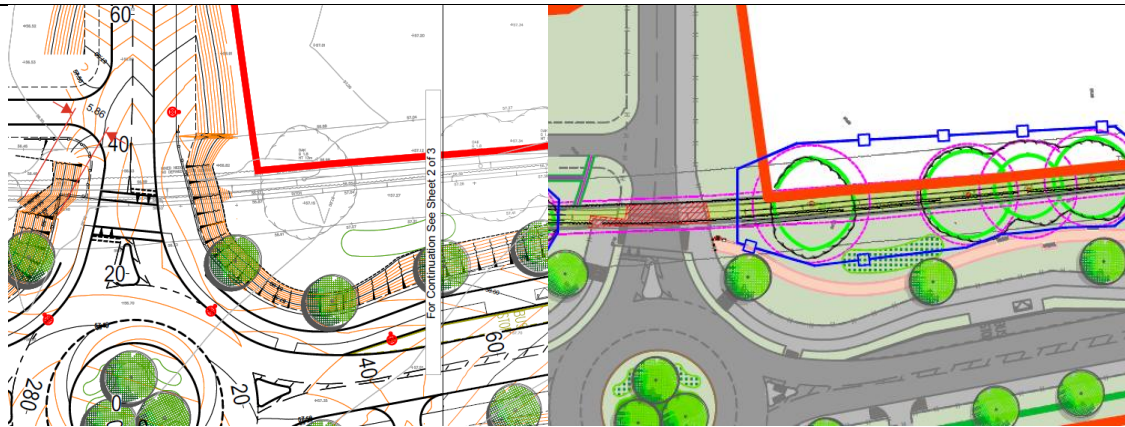
assume it is the area indicated below – if not please indicate the location of W281 in plan. Nevertheless, while the encroachment appears relatively minor, the deterioration of this existing vegetation would result in an eroding effect on the landscape character and as per points 2 and 4, its retention and healthy conditions should be secured from the outset. This arrangement is deemed an unnecessary undermining of green infrastructure and can be rectified by pulling the road, footpath and banking further south.



8. Further, the RPA of this woodland is not indicated within the TPP. Please update accordingly, noting that as per section 7.9 of the AIA, tree roots can be damaged by compaction and there should be no changes in ground levels within the identified rooting areas of retained trees.
9. RPAs and tree protection fencing are not indicated in the levels plans, and the proposed earthworks are not indicated within the TPP. It therefore appears that significantly more vegetation is likely to be lost or removed as result of the proposed levels and level of works around existing RPAs . We require both plans to be updated accordingly and that both the Arboriculturalist and BNG officer are re-consulted as a result.
10. For example, while the road layout below is subject to a separate reserved matters application, major concern is raised in regard to the significant earthworks proposed within priority habitat woodland, which is reflected as retained within the TPP. As per points 2 and 4, this landscape feature must be avoided and thus we recommend reducing or removing changes to the topography.



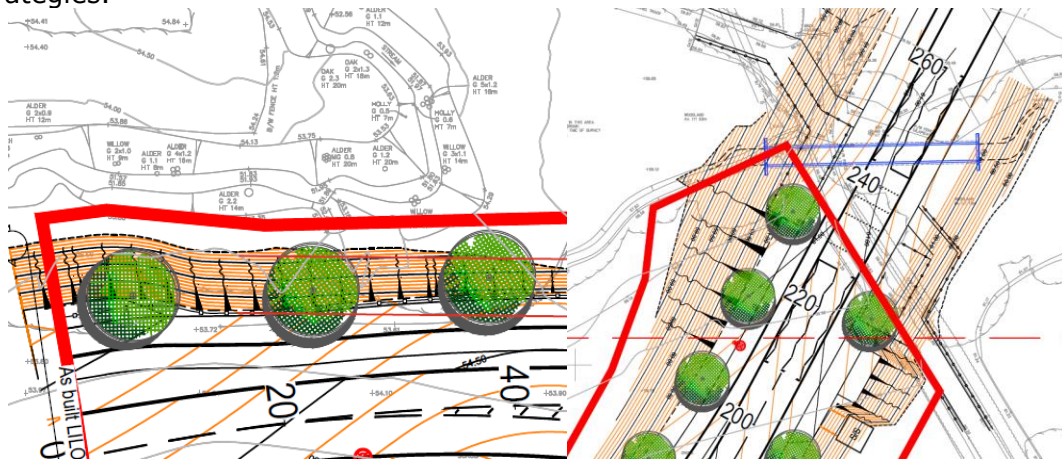
11. Levels are only reflected for the main road and appear to cut off in proximity to ancillary buildings, footpaths and secondary vehicle access routes. Please amend to reflect all proposed levels in order to ensure that the scheme is deliverable and that accessibility requirements are met. For example, how is the cycle route proposing to negotiate the proposed levels in the extracts below:



12. The sections provided only reflect the roads. The following sections are requested:
- Demonstrating the relationship between the road and the surrounding landscape
  - Connections between footpaths, cycle paths and the road, particularly the Diverted Public Right of Way (With Permissive Cycle Agreement)
  - The attenuation basin

### Drainage

13. No drainage information has been submitted, however multiple drainage features are found within the red line boundary including the large attenuation basin and the 'selective tree removal for drainage trench agreed under Arboricultural Supervision within Mixed tree group G54 PA'. This information is requested.
14. The previously highlighted slopes conflicting with woodland to the west and to the east will direct polluted run-off into the woodland, Channells Brook watercourse, ditch and the existing pond. Thus, robust pollution protection measures must be in place to avoid impacts to the landscape features, watercourses and other controlled waters in the long-term. These measures need to be coordinated across both landscape and drainage strategies.

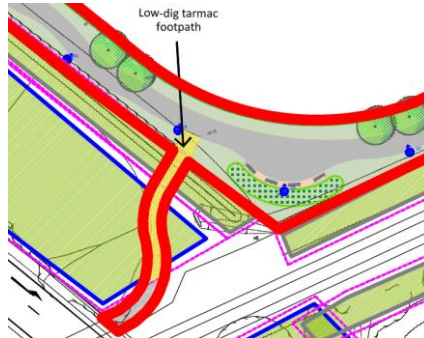


15. We note from the Landscape Statement under section 4.4 that the attenuation basin will be available as open space, however this is deemed unrealistic as the conditions are inappropriate for general amenity use. This is highlighted further by the proposed fence around the eastern perimeter.
16. As per the 'Open Space, Sport & Recreation Review 2021 (OSSRR)', SuDS schemes will not be counted towards the amenity space quantity standard as these areas cannot be used for recreational purposes.
17. The ground contouring, inlet and outlet design of all SuDS features should be carefully considered to maximise the amenity value. We recommend that headwalls are designed to

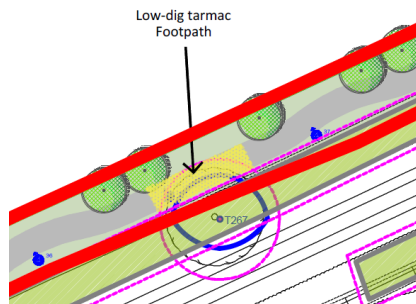
appear more naturalistic in character, for example, by cladding in Horsham stone. Please provide details

#### Soft & Hard Landscaping

18. We note within the AIA under section 5.18 that footpaths within RPAs will be porous to better allow tree roots to thrive. As such, we request the low-dig section below to reflect a porous material.



19. As above, the section below should reflect a porous material. However, as per point 5, the default position is that it should avoid the RPA entirely.



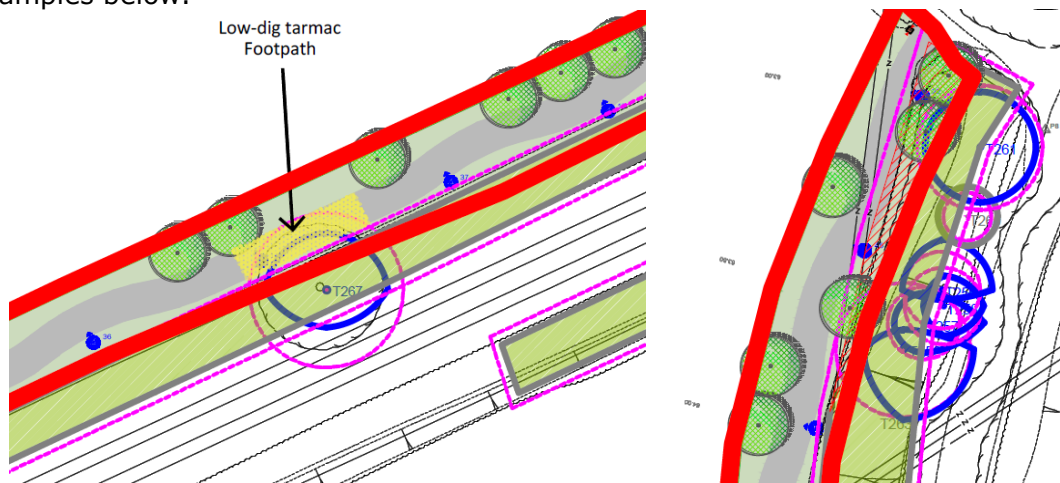
20. While *Crataegus monogyna* is welcomed within woodland mix and hedgerow, it is not deemed appropriate as a specimen tree. Please consider a lesser-used alternative within the planting palette or a species found in the adjacent woodland, as per the BNG officer's guidance.
21. We recommend adding a 5<sup>th</sup> woody species to the proposed hedgerow in order to make it species rich and thus more resilient.
22. As highlighted within the OSSR, attenuation basins should blend aesthetically into the surroundings and be planted and combined with variations in vegetation structure to ensure habitat diversity and landscape effect. We therefore recommend a greater diversity and provision to reflect nectar rich plants, various grasses and variations in vegetation structure. Please amend the planting proposals accordingly.
23. Despite being illustrated within planting proposals, the marginal/aquatic planting is not listed within the schedule. We note from the Landscape Statement under section 4.4, however, that the basin is designed to be dry much of the time, therefore as above, these species should be reviewed and added to the schedule as necessary.
24. As above, given the expected dry conditions, we recommend species like *Mentha aquatica* are only to be planted in reliably damp locations.
25. We echo comments made by the BNG officer in regard to avoiding planting within existing RPAs. As such, while swathes of bulb planting is welcomed, these should be relocated outside RPAs to avoid unnecessary disturbance and competition with existing roots.
26. HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting. Please update the furniture specification as necessary.

#### Lighting

27. Woodland and hedgerows, which are key characteristics of the local landscape, can be deteriorated due to increasing levels of light pollution, therefore light spill must be

considered sensitively so as not to cause potential adverse effects. The current lighting layout plan only indicates the southern cycle path. Please amend to reflect all lighting within the red line boundary.

28. Kirium 200 Bollards are indicated within the lighting layout plan, however Kirium 160 Bollards are indicated in the lighting document. Regardless, the lighting layout has considered 1725 lumens, which reflects neither product. Please confirm that Kirium 160 Bollards are the proposed, specifying the 2700K model so as to minimise adverse effects on surrounding existing vegetation.
29. Uplighters and columns are also indicated in the lighting document, but no locations or associated lux levels are indicated in plan. Please amend accordingly.
30. Please confirm if no lighting is proposed for the footpaths and cycle paths north of the main road.
31. As per points 2 and 4, we recommend that utilities avoid RPAs where possible. As such, please consider slightly altering the locations of bollards and associated utility runs – see examples below.



#### Specification, Establishment, Management & Maintenance

32. Please include tree pit details for sloping ground as many trees are proposed on slopes or embankments.
33. We note the following in section 5.16 of the AIA: *T270 (Goat Willow) is recommended to be re-coppiced just above ground level in order to clear the new footpath from which point it can be allowed to regrow and managed in a reduced form.* Please include this information within the Landscape Specification as well as the LEMP in regard to future maintenance.
34. Proposals must align with the requirements of the 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 priority woodland and irreplaceable ancient woodland to the north, 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. We note the relevant aims and objectives within the LEMP under 3.6.f and 4.1.d, however this should be amended to include all proposed planting, as opposed to solely replacement planting.
35. We echo comments made by the BNG officer in regard to biocides and fertiliser, and recommend that chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed ecological features, particularly the abutting woodland and waterways. We note mention of alternative methods for weeding, however there is lack of clarity as well as a reliance on herbicides throughout the LEMP and Landscape Specification. Please refer to pan-uk.org for guidance and [resources](#), noting that herbicides including glyphosate must only be used on Schedule 9 species. Please amend the following sections accordingly to clarify:

- a. Landscape Specification: 168.3, 421.1, 210, 212.2 (unless pernicious weeds are clarified), 300.3
  - b. LEMP: 5.115, 6.4.g, 6.4.j, 7.7.e, Section 9
36. We note that bark mulch is proposed around stems to retain soil moisture, however we recommend that a 120mm collar should be left free of mulch to prevent the stems/trunks from rotting. Please amend the Landscape Establishment Note, LEMP and Landscape Specification accordingly.
37. Any stakes, ties and guards should be removed upon successful establishment or after 4 years of planting, whichever is sooner. Please update the LEMP accordingly.
38. Please include details of management responsibilities.

**RECOMMENDED CONDITIONS:** N/A

|                       |                                                                   |
|-----------------------|-------------------------------------------------------------------|
| <b>NAME:</b>          | Elly Hazael<br>Trainee Landscape Architect (Planning)             |
| <b>DEPARTMENT:</b>    | Specialists Team - Strategic Planning                             |
| <b>DATE:</b>          | 17/11/2025                                                        |
| <b>SIGNED OFF BY:</b> | Inês Watson CMLI<br>Specialists Team Leader (Landscape Architect) |
| <b>DATE:</b>          | 19/11/2025                                                        |