HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	South Lodge Hotel Brighton Road Lower Beeding West Sussex
DESCRIPTION:	Application for Approval of Details Reserved by Conditions 10, 11, 12, 14 to approved application DC/22/1205
REFERENCE:	DISC/24/0092
RE-CONSULTATION:	1st set of comments in black 2nd set of comments in blue 3rd set of comments in green
RECOMMENDATION:	More Information / Modification More Information / Modification More Information / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

3rd set of comments:

The majority of our comments have been addressed, however minor modification is requested in order to discharge condition 11.

No concerns with condition 12 are raised on landscape grounds as we are satisfied that all previous comments have now been addressed.

2nd set of comments:

Some comments have been addressed, with thanks. However there remains insufficient information in order to discharge conditions 11 and 12, particularly in regard to mitigation planting.

1st set of comments:

No concerns with Condition 14 are raised on landscape grounds.

We do not wish to comment on Condition 10 as it should be discharged to the satisfaction of the Ecologist. We will however check the coordination of these details against the landscape proposals.

We are unable to discharge conditions 11 and 12 due to insufficient information. In addition, we note the current loss of vegetation behind lodges 7 & 8 and request appropriate replacement.

MAIN COMMENTS:

Landscaping proposals

The Proposed Landscape Planting Plan and Landscaping Proposal have insufficient information to satisfy the requirements of the condition and provide certainty of proposed landscape details. We request the following information:

1. Tree pit details. Closed, however we recommend the following details for successful establishment of trees:
    - Tree pit size no deeper than the root system and at least one and a half times as wide.
    - Base of tree pit should be left undisturbed unless significant drainage problems are apparent.
    - Backfill should replicate existing soil profile by using soil excavated from planting pits, only amended with imported soils if necessary. No fertiliser should be used.
    - Minimum 50mm layer of mulch should be applied to a 1m diameter around the tree. Leave a 120mm collar free of mulch to prevent the trunk from rotting.

    We recommend these details be provided as a separate document, however this is not required to be submitted on this occasion.
2. Details of all proposed trees and planting to be provided as a planting schedule specifying sizes, densities, numbers and species in Latin names. Provided with thanks. However, we request the separate provision of this with updated species as discussed below. Appendix provided within response, with thanks. As above, we recommend these be provided as a separate document, however this is not required to be submitted on this occasion.
3. Details indicating areas of vegetation clearance carried out within Access Paths (G1) outside of what was approved under DISC/23/0170. Whilst some level of vegetation removal will undoubtably be acceptable as part of the overall maintenance regime of the hotel's grounds team, we note large areas of existing hedgerow have now been removed which were considered for retention as part of the proposals and LVA assessment. These have consequences on views towards the proposals and the effects on the visual amenity of users of the public footpath and character of the area and cannot just be removed. Please note the wording of the condition which requires the landscape proposals to be delivered and retained/maintained until 5 years after completion of the development. The removal of vegetation is therefore at risk of breach of planning. We note some replacement planting, however as detailed in point 7a, Prunus laurocerasus is not an appropriate replacement, despite its current presence within the grounds. Please consider alternatives that will not outcompete existing flora. See Appendix E: 'Suggested Compensatory Planting' within the Preliminary Ecological Appraisal (PEA) for guidance. Please see appendix E of the PEA to replace Prunus laurocerasus with a suitable alternative. Plants in the Suggested Compensatory Planting list are unlikely to cause maintenance issues over and above the existing proposed planting palette.
4. The following mitigation and enhancement measures as listed within the LVIA under DC/22/1205 have not been detailed. We recommend including the proposals in plan with any maintenance measures to be included in an LMMP:
    a. Planting for filtered views to the yoga suite – we acknowledge the request for these to be reserved for a later date, however we request the indicative location be added to plan. Not yet addressed. We do not require

planting details at this stage, only the indicative location. Indicative location provided, with thanks.

b. Reinforcing and enhancing existing strip of trees with native trees and understory planting from south of the site to Birch Copse. Not yet addressed. In regard to the location query, the area in question is the treeline connecting the south of the site to the woodland, as seen in Appendix A in the LVIA. Please review Figure 5.1, sections 5.0 and 6.13 of the LVIA for guidance. While the proposed planting palette is welcomed, in order to fulfil the requirements of the condition, we expect to see location added to plan and a planting schedule provided.

c. In addition to the above, it is noted that buffer planting for the engineered reed bed has not yet been provided. As with 4b, we request these details in plan and recommend referring to Appendix E of the PEA for guidance. As above, these details must be added to plan and a planting schedule provided in order to discharge this condition.

5. Planting proposals should be detailed rather than indicative; we request locations and densities of specific species in plan. Provided with thanks. However, we request the separate provision of this with updated species as discussed in points 3, 4, 6 and 7. Please provide updated proposals once points 3 & 6 have been addressed.
6. We note the loss of mature planting and vegetation behind lodges 7 & 8, as marked to be maintained under Proposed Landscape Planting. These areas must be appropriately replaced to mitigate the visual effects now experienced from the footpath. To ensure proposals can be delivered, a new plan should be produced demonstrating areas of removed and retained planting, as well as updated proposed planting. Mature, native specimens are recommended for more instant impact. Not yet addressed. In addition to point 3, we recommend further tree planting to the north of lodges 7 & 8 to mitigate the loss of vegetation and therefore the effects on the visual amenity of users of the public footpath and character of the area. Opportunity for further tree planting to the north of lodges 7 & 8 still remains as proposed hedgerow will not solely or sufficiently mitigate visual effects. See indicative suggestions below in blue.



7. Following the mitigation and enhancement measures listed within the LVIA under DC/22/1205, vegetation should be reinforced by native tree and understory planting. We recommend the following regarding non-native species:
    a. Prunus laurocerasus is invasive and outcompetes native species, please consider a suitable alternative such as Ligustrum vulgare, Hedera helix or a mixed native hedgerow with Carpinus betulus for semi-evergreen cover. Not yet addressed. Alternative species may be used to ones suggested above, such as those listed in Appendix E of the PEA, however we advise against invasive species such as Prunus laurocerasus. See point 3.
    b. Liquidambar styraciflua may not be suitable for the location, given its potential size and relationship with the dwelling, please consider a suitable alternative such as Alnus glutinosa or Salix caprea, both of which are suitable for proposed coppicing. Closed.
    c. Some cultivars of Acer rubrum may be acceptable, however please consider native alternatives such as those listed above, or specify proposed cultivar and location. Closed.
    d. While not native, some numbers and cultivars of Hellebore are welcomed. In addition, Cornus sanguinea is welcomed. However, we recommend introducing variety to extend seasonal interest and support biodiversity, given the proximity of woodland and the existing waterbody. Please consider alternatives and additions, such as Hyacinthoides non-scripta, Galanthus nivalis, Galium odoratum, Myosotis sylvatica, Silene flos-cuculi, Lonicera fragrantissima and Lonicera periclymenum. Not addressed and Cornus sanguinea has been removed from plans. Otherwise, closed. Cornus sanguinea reinstated, with thanks.

8. Please include locations of bird boxes, bat boxes, log piles and hibernacula in plan. Closed, with thanks.

LMMP

While we acknowledge that the site is under the maintenance plans of the hotel, these details must be submitted in order to discharge condition 12. In addition, the sensitive nature of the site, given the existing waterbody, and the specific soft landscaping elements require a separate maintenance plan. We expect to receive long-term design objectives, clear management responsibilities, specifications, maintenance schedules and periods for all hard and soft landscaped areas, and including all woodland, hedgerows and trees together with a timetable for the implementation. We also require the following detail:

9. Information on both tree stakes and tree guards, including when they are to be removed. Closed, with thanks.
10. Information on watering schedules. Information provided, with thanks. Please include within an updated LMMP for clarity. Closed, with thanks.
11. Information on weed removal regarding establishment of trees. We recommend that chemicals including herbicides, pesticides and fertilisers are not to be applied on site at any time due to the impacts on the existing waterbody and woodland, and the protection of their ecological features. Information provided, with thanks. Please include within an updated LMMP for clarity. Closed, with thanks.
12. Information on coppice management, planting and natural regeneration as identified under 'Planning and Land Management Guidelines' in the 'Crabtree and Nuthurst Ridge and Ghyll Farmlands' LCA. Information provided, with thanks. Please include within an updated LMMP for clarity. Closed, with thanks.

External lighting

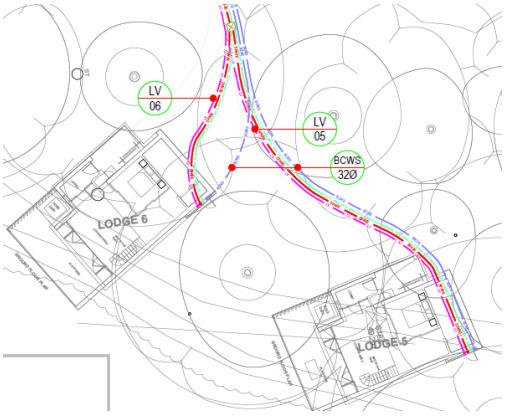
13. Due to potential light intrusion within the rural setting, there is concern with the proposed scheme as well as the limited information regarding hours of use. Based on guidance from SDNP Dark Skies Technical Advice Note Version 2 and The Bat Conservation Trust guidance note 08/23, we recommend the following for external lighting in a countryside location to mitigate adverse landscape effects:
    a. 3000Kelvin or lower
    b. 500 Lumens or below
    c. Shielding such as cowls, baffles or back shields to limit visibility beyond pathways.
    d. 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.
    e. Horizontally mounted luminaires with no light output above 90° and/or no upward tilt – for example, single sided distribution bollards at a spacing of 11m and a height of 1.3m allowing paths to be lit to adoptable standards.

    Some information provided with thanks. While we note the likelihood of wildlife triggering the PIR, we would still recommend a 1 or 2 minute timer is more appropriate than an always-on approach, given the light intrusion within the rural setting. As above, please provide information regarding hours of use. Closed, with thanks.
14. There is additional concern with light spill from the use of the lodges.
    a. The proposed windows are floor to ceiling in height which are likely to cause a large amount of light spill, reducing the rural character. We recommend that black out blinds are installed, although we are wary of the enforceability of this measure. Closed.

b. The external downlighters on the lodges are also likely to cause light intrusion. We request information as per condition 11, as well as colour temperature and lumens. As above, warm temperature and horizontally mounted luminaires are recommended. Information provided for downlighters with thanks. However, please provide information regarding hours of use for newly proposed festoon lighting, in order to minimise light intrusion. Closed, with thanks.

Utilities plan

15. Clarification is requested regarding the separate trenches for LV|06 and BCWS|32Ø, (Lodge 6 below). As seen with the other lodges, we recommend using a single trench for these services in order to minimise disturbance within the RPA unless there is good justification not to do so. Confirmation on the single trench provided with thanks. However, please provide updated plans. Closed, with thanks.



RECOMMENDED CONDITIONS:

Hard and soft landscaping condition for the yoga suite, specifically regarding detailed planting proposals plan to demonstrate filtered views to the yoga suite from PRoW 1732.

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	22/05/2024 24/06/2024 23/07/2024
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	29/05/2024 10/07/2024 23/07/2024