HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Angell Sandpit Washington Road Storrington West Sussex
DESCRIPTION:	Approval of details reserved by condition 16 to approved application DC/23/2144
REFERENCE:	DISC/25/0172
RE-CONSULT:	1st set of comments in black 2nd set of comments in blue
RECOMMENDATION:	Holding Objection / Modification Holding Objection / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

2nd set of comments

Many of our previous comments in regard to soft landscaping, drainage conflicts and planting specification have been addressed, with thanks. However, major concern still remains with the SSSI buffer zone having been incorporated into private curtilage. For clarity, the key relevant requirement of Condition 16 is repeated here: *Details of all boundary treatments and fencing, including means to permanently enclose the Buffer Zone and prevent access / inclusion of this area into residential curtilages, and details of any retaining walls.*

As such, we cannot recommend the discharge of Condition 16 until this information can be secured.

We note correspondence dated 23rd July in regard to boundaries. Because we acknowledge the landowners' rights to erect a boundary fence on their property, it is important to clarify that the Buffer Zone should not be part of property ownership. Establishing a precedent for boundary fencing within this zone risks enabling future installation of more impermeable barriers, which would undermine the ecological function and intent of the Buffer Zone.

In addition, if field gates were to remain open to facilitate movement, this negates their purpose as a boundary feature in first place and justifies their full-length removal from the proposals.

The correspondence suggests that maintenance gates would remain locked unless needed for access. It would be unreasonable for the council to control and enforce that private field gates, within private land, remain open or closed as a workaround for the fact that the buffer zone must not be accessible to residents. We continue to recommend one gate for maintenance purposes at the end of the driveway in between Plots 3 and 4 for a third party contractor.

1st set of comments

The majority of landscape concerns previously raised in relation to application DC/23/2144 remain unresolved and continue to be relevant to the current proposals. As submitted, the scheme does not demonstrate sufficient regard for the sensitivities of the SSSI and SDNP. Furthermore, the information submitted demonstrates conflict with the delivery of underground services and landscape strategies, therefore we cannot recommend the discharge of the condition. Please see below for details.

MAIN COMMENTS:

Drainage

1. Major concern is raised with the conflict between underground services (particularly the foul pipe) and the landscape proposals. The Drainage layout results in utilities being located underneath or in very close proximity of proposed trees, therefore the trees are unlikely to be delivered and/or retained in the long term. While acknowledging the drainage strategy is approved, it is clear this was not coordinated with the landscape proposals. Therefore, the service runs, and approved plans must be adjusted so that both strategies can be delivered. The proposed trees are key to the general amenity of the development, but more importantly, serve as landscape mitigation to retain the wooded character of the area, particularly given the views from the SDNP.
2. A plan demonstrating coordination of landscape and drainage proposals (including boreholes and other underground services), as well as clear indication of tree root barriers must be submitted.

   Utilities overlay plan provided, with thanks. Closed.

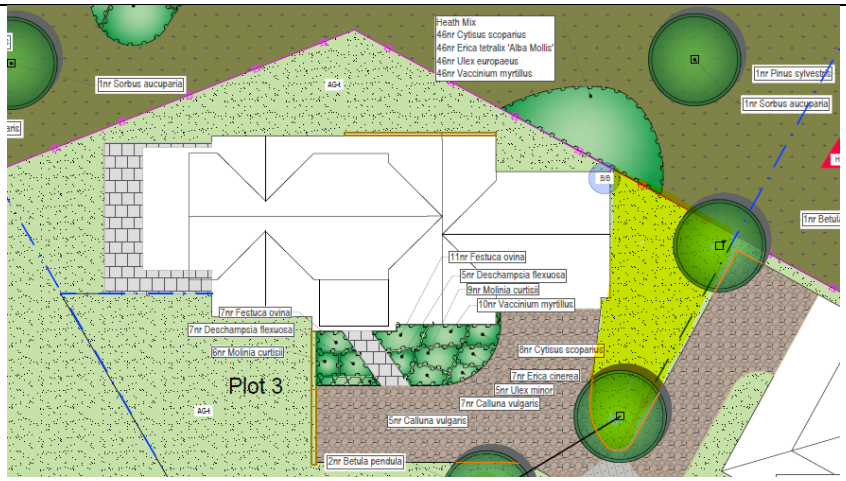
Maintenance Access

3. As outlined under DC/23/2144, a plan showing the access arrangements to the buffer zone is required to ensure the area can be appropriately maintained. For reference, the previous comments are repeated below: '*Access into the buffer zone is needed for annual maintenance purposes, however this is not detailed in the plans. Given that access/inclusion into residential curtilages is permanently prevented, but that it is bounded by private amenity space, clarification is required as to how the buffer zone will be accessed for maintenance purposes. Details on treatment are also requested for approval*.'

   Please see summary of comments.
4. Also as previously outlined, securing the area highlighted in yellow below as communal open space instead of private land is important to secure the mitigation strategy. For reference, the previous comments were as follows: '*Given the proposed changes to layout of plot 3, the area now cut off from the main garden to the east of the property is required to become part of the communal space. This is to secure the planting strategy/mitigation measures to retain the wooded character of the area and visual amenity, particularly when seen from the elevated parts of the SDNP, and therefore should be planted, managed and maintained as with the central mixed woodland area (shown in yellow below).* '

   Furthermore, retaining the area indicated as communal space, may have additional benefits of providing a reliable maintenance access point.

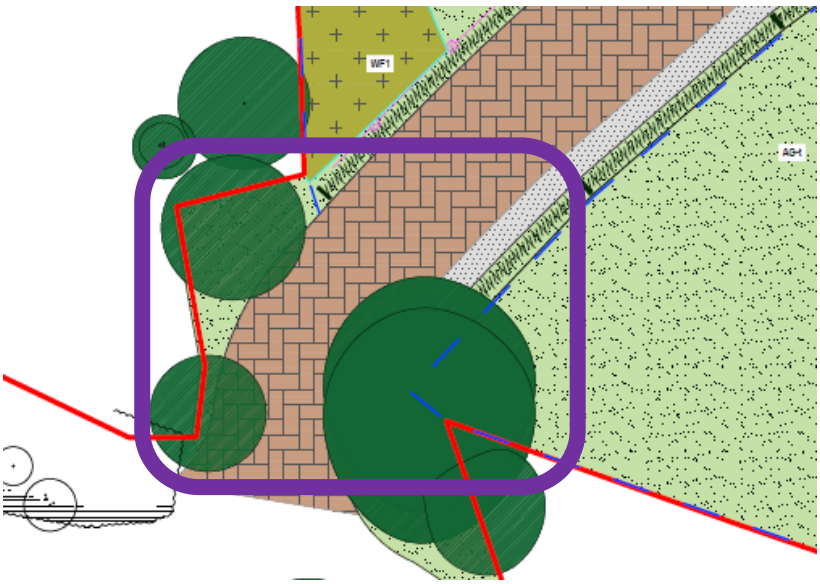
   We note correspondence and are satisfied to close this comment.



Soft Landscaping

5. Trees
   a. The trees within the purple frame are shown for removal in the Tree Retention and Protection Plan, therefore should not be indicated as existing within the landscape plan. Notwithstanding, replacement trees would be desirable in this location to create a softer, designed sense of arrival.

      Trees shown for removal have been removed from the landscape plan, with thanks, however no replacement trees have been proposed. Outstanding.



   b. While the variation in proposed sizes is welcomed, we expect to see further diversity in species. A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats. We recommend following Santamour's rule of 30:20:10 where no more than 10% of proposed trees should be the same species, no more than 20% should be the same genus and no more than 30% should be the same family. Please consider amending the schedule accordingly, given that Betula pendula comprises 57% of the tree planting mix.

      Not yet addressed. However, this outstanding point is deemed minor on this occasion, therefore closed.

   c. As per previous comments, Fagus sylvatica will not thrive on very thin, sandy soils, therefore an alternative species is advised.

      Closed.

6. Hedgerow
    a. As per previous comments, Corylus avellana does not thrive on very acid soils. Please consider an alternative species, such as Frangula alnus which is found within the neighbouring SSSI.

       Closed, with thanks.
7. Shrub mix
    a. Please amend Molinia curtisii to Molinia caerulea.

       Closed, with thanks.
8. Heath mix
    a. As per comments made by the National Trust under DC/21/0057, native species of heather should be used due to the location of the abutting SSSI. Please remove cultivars or use them very sparingly i.e. amending Erica tetralix 'Alba Mollis' to Erica tetralix.

       Closed, with thanks.
9. Other
    a. Wildflower turf is not a suitable option for this location and should be replaced with heathers and grasses, as seen throughout much of the scheme. As previously advised: *'It is recommended that heathers are planted instead of meadow to correspond with the soils, lowland heathland habitat and local landscape character area.'*

       Closed, with thanks.
    b. We acknowledge the note remarking the following, '*Proposed planting had been designed to reflect the guidance set out in Chapter 4 of the NHBC Standards, however structural engineers to review all proposed planting during technical design stage and advise of any species changes required to comply with NHBC Standards*.' Please note, however, that any changes to the planting schedule must be reviewed in addition by a qualified landscape architect and written consent given from the Local Planning Authority, as per Condition 16.

       Closed, with thanks.

<u>Hard Landscaping</u>

10. Please confirm that the bituminous macadam surfacing and concrete block paving is permeable as per the approved drainage strategy.

    Porous alternatives to bituminous macadam surfacing and concrete block paving provided, with thanks. However, please add pavement material to the legend.
11. As previously noted, the DAS proposes block paving for the access road as part of the hard landscape strategy. This approach is preferable over tarmac, offering a softer treatment more appropriate to the site's rural setting.

    As above, porous concrete block paving has been submitted, with thanks.
12. It is noted that the 'feature steps' and the pathway through the central 'community woodland' are absent from the submitted proposals. Please update plans to include these elements or provide a clear justification for their omission.

    No justification for the omission of feature steps and pathway has been provided and access now appears to have been removed. Sound rationale is expected to be provided as to why these features have been omitted from the central 'community woodland'.

<u>Boundaries</u>

13. Closeboard fence is not considered appropriate or necessary considering the site's rural context and immediate setting.

    Closed, with thanks.

14. Of particular concern is the boundary of the SSSI buffer. To the north, a post and rail fence is required. To the south where the boundary abuts Plots 2, 3 & 4, a combination of hedgerow and security mesh fencing is advised, with a height range of 1.5m to 1.8m.

    Chestnut paling proposed, which is deemed as sufficient on this occasion. Closed.

15. Please remove fencing from within the buffer. This area must be located outside the residential curtilage with limited access for the management company to achieve its ecological function.

    Please see summary of comments.

16. While some positive boundary changes have been made within this scheme, our annotation under DC/23/2144 still has relevance and is redrawn below accounting for the changes:
    a. Pink represents post and rail.
    b. Orange represents security mesh fencing to prevent access, as discussed above.
    c. Green represents hedgerow with wire fencing.
    d. Red crosses indicate removal of boundary treatment.

    Please see summary of comments. In addition, we query the removal of fencing to delineate private gardens and recommend that it is reinstated.



<u>Planting Specification</u>

17. As per point 9.b, any proposed replacement species and deviation from the planting schedules should be agreed with the Local Planning Authority in accordance with condition 16.

    Note added, with thanks. Closed.

18. Please ensure that a 120mm collar should be left free of mulch to prevent the stems/trunks from rotting.

    Closed, with thanks.

19. Please include specification to remove the biodegradable plastic spiral guards after establishment or after 4 years of planting, whichever is sooner.

Closed, with thanks.

20. We advise against the use of geotextile weed suppressant membrane due to its limited effectiveness and the environmental concern associated with plastic degradation and microplastics pollution. The use of bark mulch, as also proposed, is sufficient, particularly given the sensitivity of the site.

    Closed, with thanks.

21. Please review the tree pit details to omit the 'drainage layer' incorporating geotextiles. Given the site's soil conditions, this layer is considered unnecessary and introduces avoidable synthetic materials into the planting environment.

    Not yet addressed. However, this outstanding point is deemed minor on this occasion, therefore closed.

22. Given the specific soil conditions that have influenced the planting palette, it is recommended that topsoil for shrub, hedgerow and woodland planting be site-won wherever possible. Imported topsoil or conditioners should only be incorporated if absolutely necessary to support successful establishment.

    Closed, with thanks.

23. We advise against the rotary cultivation of undisturbed topsoil as this practice can negatively impact the soil microbiome, thereby limiting successful plant establishment.

    Closed, with thanks.

24. Chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed landscape features, and the protection of their ecological features. Alternative methods for weeding should be considered such as hot foam or hot water systems which are effective for large areas of land, meadow preparation and hard landscaped areas. Steel brushing in combination with acetic acid spraying, or electronic control systems are also effective in hard landscaped areas and suited to dealing with invasive species. Please remove all mention of herbicides and soil improver – except for mushroom compost - and reflect alternative methods as above or hand weeding alone by careful digging or selective scything.

    Closed, with thanks.

Other

25. While details are not required as part of this condition discharge, we recommend providing the LMMP as well as information detailing the storage of refuse and recycling, cycle parking and electric vehicle charging points in order to ensure that changes to soft and hard landscaping are not required at a later stage.

    Not yet addressed.

Additional comments as a result of changes

26. While heathland planting has increased overall, with thanks, we note that 200 heathland plants have been removed from the buffer zone. Given the ecological function of the buffer zone and that planting within private curtilage cannot be secured, we request that this planting is reinstated.
27. Please amend 'hedgerow' within the legend to reflect, 'hedgerow with 1m high post and galvanised wire fence' for clarity, as per the planting specification.

RECOMMENDED CONDITIONS: N/A	
NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	23/06/2025 20/08/2025

SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	26/06/2025 21/08/2025