HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Billingshurst Road, Ashington
DESCRIPTION:	Outline application with all matters reserved except access, for up to 65 dwellings, access from Billingshurst Road, parking, landscaping, open space, sustainable drainage and associated infrastructure.
REFERENCE:	DC/26/1037
RECOMMENDATION:	More Information / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

Although the site has some capacity for development and the submitted landscape and visual evidence is broadly proportionate, the application does not yet demonstrate that the proposed development, landscape mitigation and associated highway works can be delivered without unacceptable effects on landscape character, visual amenity, existing hedgerows and important protected trees.

Further information and amended parameter plans are required to:

1. correct and reconcile the inconsistencies within the LVA;
2. assess relevant cumulative landscape and visual effects;
3. provide Type 3 visualisations from selected key viewpoints;
4. justify the predicted long-term beneficial effects;
5. secure the retention and enhancement of important hedgerows and boundary vegetation;
6. provide adequate development offsets from T7, T8 and other retained trees;
7. demonstrate that the Billingshurst Road highway works can be delivered without unacceptable harm to protected roadside trees;
8. secure structural landscape buffers and green infrastructure through the controlling parameter plans; and
9. provide a coordinated, measurable and policy-compliant open-space strategy and land budget plan.

Until these matters are satisfactorily addressed, the landscape and visual effects of the development, and the deliverability of the mitigation relied upon in the LVA, cannot be properly assessed.

MAIN COMMENTS:

Site description and context

1. The proposed development site lies to the northern edge of Ashington, outside but adjoining the Built-Up Area Boundary. It comprises of irregular shaped land associated with Oast House Farm, which is bounded by rear gardens of dwellings that sit along Billingshurst Road to the east, Linfield Lane to the south-east and Luckista Grove to the north.

2. The site contains a number of farm buildings and paddocks, hardstanding, sheds, a track adjacent to Oast House Farm that divides the site into two, scrub vegetation and field enclosures, with a hedgerow forming the field's western boundary. The site's red line boundary goes beyond the field boundary and into the immediate adjacent western open field to allow for the proposed SuDS strategy to be implemented.

3. The immediate site context is semi-rural reflecting the edge of settlement location and influenced by both rural and urban features. Rural characteristics are evident through the site's historic agricultural use, the presence of farm buildings and heritage assets, hedgerowed field boundaries, scrubland, mature woodland to the south and its relationship with the wider countryside beyond the western boundary. The Public Right of Way (PRoW) to the west and views towards the surrounding rural landscape also contribute to this countryside character.

4. In contrast, the site is influenced by the adjacent residential development along Billingshurst Road to the east, Linfield Lane to the south and Luckista Grove to the north. Additional urbanising influences include the nearby mobile home park to the north-west.

5. The site is generally contained by existing development and vegetation, although it remains visually and physically connected to the surrounding countryside along its western edge. The land slopes gently towards the south-west and contains protected trees in proximity to the site, including notable oak trees along Billingshurst Road and Oakwood Copse, a TPO woodland immediately to the south of the site. Whilst there are no designated heritage assets on the site itself, Grade II listed buildings lie east of Billingshurst Road and the Grade I listed Church of the Holy Sepulchre is approximately 1.3km west.

6. Views into the site are readily available from PRoW 2491, which runs adjacent to the western boundary hedgerow, in a north-south direction. Views from PRoW 2490 that runs along Luckista Grove and adjoins a short portion of the site's northern boundary, are mostly curtailed by existing vegetation to then open up as it diverts away to the back of the mobile home park.

Landscape Character and Capacity Guidance:

7. The site lies within National Character Area 121: Low Weald. Relevant characteristics include a pastoral landscape, woodlands, hedgerows, shaws and mature hedgerow trees. Relevant opportunities include strengthening woodland and hedgerow connectivity and creating high-quality green and blue infrastructure.

8. At county level, the site lies within Southern Low Weald (LW5). Relevant characteristics include gently undulating landform, small pastures, hedgerows,

shaws, woodland blocks and hedgerow Oaks. Sensitivities include hedgerow and specimen tree loss, settlement expansion and road improvements.

9. The proposed site falls within J2 - Broadford Bridge to Ashington Farmlands of the Landscape Character Area (LCA) as defined in the Horsham District Landscape Character Assessment (2003).

10. The site displays a number of characteristics that are representative of the J2 LCA, including its association with a historic farmstead, the presence of mature oak trees, narrow lanes, hedgerow boundaries, scattered vegetation and gently sloping landform.

11. The site occupies a transitional position on the edge of Ashington, reflecting the suburban influences noted within the character assessment whilst retaining a visual and physical relationship with the surrounding countryside. Although the historic pattern of small enclosed fields is less evident within the site due to the presence of former farm buildings, hardstanding and fragmented enclosures, the western hedgerow boundary and mature tree cover continue to contribute to the wooded and enclosed character of the wider landscape. The two protected oak trees adjacent to Billingshurst Road are particularly notable features, reflecting the LCA's identification of mature oak trees as a key characteristic of the landscape.

12. The LCA identifies the need to conserve the predominantly rural character of the area, conserve and restore hedgerows, shaws and mature hedgerow trees, and ensure that any new development is well integrated within the existing landscape framework. Existing hedgerows, mature trees and vegetated boundaries on and around the site therefore represent key landscape features that contribute to local character and should be retained, enhanced and incorporated into any future development proposals.

13. The Horsham District Landscape Capacity Assessment (2021 Rev B) locates the proposed site within Local Landscape Character Area (LLCA) AS3. The study identifies varying capacity for housing development across the area, with an overall landscape capacity for medium scale development of low to moderate. It highlights the need to protect hedgerows associated with access and avoid significant visual effects on adjacent rural countryside.

14. The site is located within the eastern part of the character area, where settlement influences are more apparent and the small-scale hedgerowed field pattern is less strongly expressed. The assessment acknowledges some limited potential for development in this part of the landscape, provided that important landscape features are retained and there are no unacceptable effects on hedgerows, rural lanes or the adjacent countryside. In this respect, the mature TPO oak trees adjacent to Billingshurst Road and the existing hedgerows represent important landscape features that contribute to local character and visual containment. Any development should therefore demonstrate how these features will be retained and protected, whilst ensuring the transition between the settlement edge and surrounding countryside is appropriately managed and that visual effects on the wider rural landscape are minimised.

<u>Landscape and Visual Appraisal (LVA) – further information required:</u>

15. The Landscape and Visual Appraisal provided has been reviewed following the Landscape Institute’s Technical Guidance Note (2020). Overall, the appraisal is considered proportionate, however, a number of methodological and reporting deficiencies reduce confidence in its findings in addition to its conclusions being

subject to landscape mitigation that does not appear to be secured through the parameter plans.

16. In its conclusions, the LVA identifies Moderate and Minor adverse landscape effects in the short term. It identifies Major adverse visual effects at viewpoints immediately adjoining the western site edge, reducing to Minor adverse or Minor beneficial as planting matures.
17. In addition, the methodology states that, where relevant, approved and allocated development within the study area would be considered in relation to potential cumulative landscape and visual effects. Considering the wider draft allocation as proposed as part of the Local Plan (currently under examination) and the sites that have been allocated in the neighbourhood plan, and/or received recent consent in Ashington, the cumulative landscape and visual effects must be assessed. The LVA should identify the committed, consented and allocated developments included in the cumulative baseline, and assess combined effects where there is potential for interaction in relation to settlement expansion, landscape character or views from the PRoW network.
18. A number of inconsistencies can be found within the reporting of the effects, which undermine the summary conclusions:
    a. VP02 is described in the narrative as improving to Minor beneficial, while Table 6.2 records it as Negligible.
    b. VP03 is described as Minor adverse improving to Minor beneficial, while Table 6.2 records Minor beneficial and Moderate beneficial.
    c. VP05 is described in the narrative as reducing from Moderate adverse to Minor adverse, while Table 6.2 records Moderate adverse for both periods.
    d. VP08 is described in the narrative as remaining Minor adverse, while Table 6.2 records Minor adverse improving to Minor beneficial.
    e. The executive summary anticipates an overall Minor beneficial visual effect over time, despite adverse effects remaining for some receptors. The basis for this overall judgement is not reconciled with the individual findings.
19. Nevertheless, while some conclusions and judgements are concurred with, others remain disputed, including the sensitivity of receptors on public rights of way which is recorded as medium visual sensitivity, without clear reasoning, affecting judgement of V06, V07, V08 and V09.
20. No visualisations of the proposed development are provided for any of the viewpoints. Type 3 visualisations should be provided from selected key viewpoints in accordance with Landscape Institute TGN 06/19. Wireline (type 2) representations would be acceptable for V02 and V05, where the primary purpose is to demonstrate the scale, massing and extent of the proposed built development. For V03, V08 and V10, verified photomontages should be provided because the assessment relies materially on proposed planting to mitigate visual effects. These should illustrate the development at an appropriate establishment year and future assessment year, supported by clearly stated assumptions concerning planting sizes, species, spacing, management and anticipated growth.
21. Further justification is also required for the predicted long-term beneficial effects, as the maturation of planting to screen or soften development does not in itself demonstrate an improvement over the existing baseline. The overall Minor Beneficial conclusions are not adequately reconciled with the permanent loss of

semi-rural character, the Major Adverse initial effects on users of PRoW 2491 and the residual adverse effects identified for several receptors.

Mitigation & Strategic Objectives

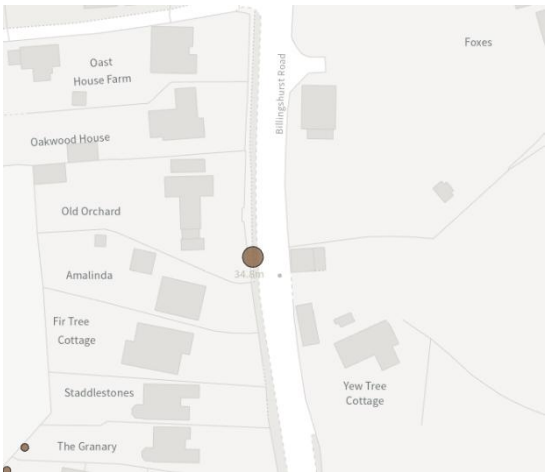
22. A number of Mitigation measures and Strategic Objectives have been identified in both the LVA and Landscape Design Strategy respectively. These are generally appropriate in principle, including retention of vegetation, reinforcement of hedgerows, native planting, habitat connectivity and a landscape buffer beside the PRoW. However, they do not appear to be carried through into the proposals. These include, amongst others:
    a. *Retention of the historic field patterns through the setting back of development from historic or established boundaries.* – as discussed below a number of well established hedgerows is proposed for removal.
    b. *Protection and retention of the existing boundary vegetation and reinforcement through native shrub and tree planting* – refer to paragraphs 27 and 28 below.
    c. *Incorporation of exiting long views to distant ridges whilst respecting existing field patterns, as described within landscape management guidelines* – long distance views not indicated in the parameter plan and not demonstrated in the landscape strategy or illustrative masterplan.
    d. *Enhancing the Site frontage along Billinghurst Road, integrating the Site into the semi-rural streetscape through suitable planting and well-designed boundary treatment* – not demonstrated through the illustrative masterplan.
    e. Provision of high quality street scenes achieved by planting of compact canopy, ecologically valued tree species within the built area - not demonstrate through the illustrative masterplan.

Key Principles

23. In order to mitigate adverse effects on landscape character and visual amenity, and to comply with HDPF Policies 25, 26, 31 and 33 (6), existing vegetation must be protected, conserved and enhanced.
24. Therefore, it is regrettable that H9, H10 & H11, all recorded as being in good condition (B2) are proposed for removal. The retention of these hedgerows can easily be accommodated within the layout and is recommended.
25. Similarly, the proposed extent of the southern portion of H12 to be removed is queried noting in addition that this is not coordinated between Parameter Plan and Combined Tree Retention/Removal & draft Protection Plan.
26. In order to safeguard the existing green infrastructure bounding the site, proposals must demonstrate compliance with BS 5837:2012 and as such, development within root protection areas (RPAs) should only be observed where unavoidable.
27. Where the areas of the site are undeveloped, we consider the layout can be adjusted to fully avoid RPAs, noting that trees are highly susceptible to rapid decline due to sudden changes in their rooting medium. To this effect, concern is raised with the close proximity of development to T7 and T8, which are features of significant landscape value within the landscape. The LVA treats retention and enhancement of boundary vegetation and mature trees as an important part of its mitigation and its beneficial long-term conclusions. Further, the tree officer's noted that the RPAs for these trees are unlikely to be correctly depicted on the plan due to the position of the trees adjacent to Billingshurst road. These must be reviewed and layout/parameter plan revised to secure and safeguard the longevity of the trees. By providing a more generous buffer between the

development, T7 and T8, the retention of T10 and potentially T9, both identified as Cat B, may also be secured in addition.

28. The Tree officer raised concerns with the offsite highway improvement works proposed along Billingshurst road. The widening of the footway and other highway upgrading works are likely to require excavation and engineering works within the root protection areas of several roadside oak trees, including the Oak protected by TPO/1496 (in front of Old Orchard's boundary), but this is not clear from the information provided. The submitted information does not adequately demonstrate how these works could be achieved without harm to the trees, a recognised landscape feature. Please refer to extracts below. While it is recognised that these works may be necessary, the impact on the TPO tree must be fully understood so that an informed decision can be made.

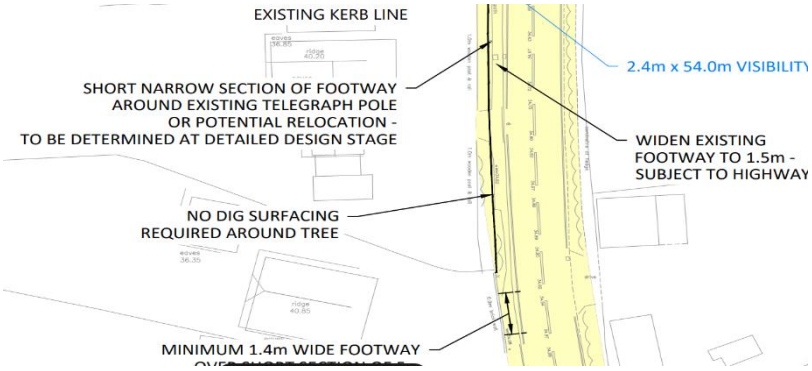


TPO 1496

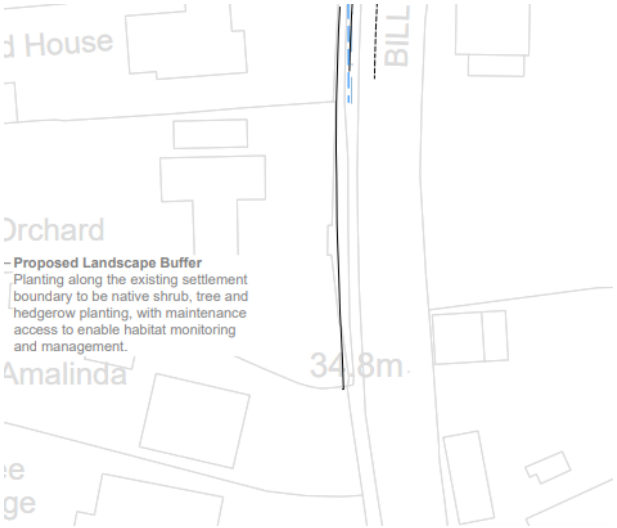




Photo 1 Looking towards TPO 1496 in a southerly direction. Photo 2 Looking towards north in close proximity to the tree showing how tight the existing footpath is due to the position of the large tree trunk



Transport Statement



AIA

Landscape Design Strategy – hard and soft materials – amendments required:

29. Where appropriate consider the use of native trees and shrubs identified within the J2 Character Area.

30. Development facing the public realm is expected to include higher quality treatments as opposed to generalised close board fence across the board. Therefore, the hardscape materials strategy must include proposals for appropriate treatment to front gardens and brick walls to garden boundaries adjoining the public realm.

Open Space Strategy

31. Proposals must demonstrate compliance with the Horsham District Council's Open Space, Sports & Recreation Review 2021 (OSSR). A plan submitted under Landscape Design Strategy Appendix A (POS Allocations, indicates how the open space is envisaged to meet the OSSR typologies and Figure 3 (page 11, Landscape Design Strategy) quantifies the area proposed for each typology.

32. The applicant suggests the population would be 135.4 people. However, given the housing element is in outline (indicative mix), the Horsham District Open Space, Sport and Recreation Review 2021 makes clear the occupancy figure

applied should be 2.4 when calculating the minimum requirements. On this basis officers estimate the population to be 156 people.

33. The open space requirements generated by the 65 dwellings (156 population) are set on the table below:

				Open space required per person:			Multi-functional greenspace proposed / potential split:			Children and young people proposed / potential split:	
	occupancy assumption	number of units	calculated occupancy of scheme	**Allotments** 1.8m2 per person	**Multi-functional greenspace** 43.9m2 per person	**Children and young people** 0.7m2 per person	***Parks and Gardens*** 13.8m2 per person	***Amenity Greenspace*** 5.8m2 per person	***Natural and Semi-Natural*** 24.3m2 per person	***Children*** 0.5m2 per person	***Youth areas and facilities*** 0.2m2 per person
				1.8	43.9	0.7	13.8	5.8	24.3	0.5	0.2
inknown	2.4	65	156	280.8	6848.4	109.2	2152.8	904.8	3790.8	78	31.2
. bed flats	1.2	0	0	0	0	0	0	0	0	0	0
. bed houses	1.7	0	0	0	0	0		0	0	0	0
! bed flats	1.3	0	0	0	0	0	0	0	0	0	0
! bed houses	1.8	0	0	0	0	0	0	0	0	0	0
! bed flats	1.7	0	0	0	0	0	0	0	0	0	0
! bed houses	2.2	0	0	0	0	0	0	0	0	0	0
i+ flats	2.4	0	0	0	0	0	0	0	0	0	0
! bed houses	2.7	0	0	0	0	0	0	0	0	0	0
i+ bed houses	3	0	0	0	0	0	0	0	0	0	0
			Area required for each typology (m2)	280.8	6848.4	109.2	2152.8	904.8	3790.8	78	31.2

34. Of these, it is expected that this parcel would provide a LAP, Amenity greenspace and Natural and Semi-natural green space as suggested. With regards the other typologies, please see Wider Masterplan Observations & Open Space Provision section below.

<u>Parameter Plans - amendments required</u>

35. Access and Movement – this parameter plan must be updated and coordinated to deliver the objectives of the wider masterplan

36. Building heights – recommend extending the lower height dwellings adjacent to properties along Billingshurst Road (Oasthouse farm, Oakwood house, Old orchard).

37. Landscape & open space – structural boundary along the western, eastern and southern boundaries must be indicated and secured within the controlling plan to reflect the findings and recommendations of the LVA. As above adjust to reflect wider buffer along Billingshurst Road to secure retention of T7 & T8 (and potentially T10 & T9). In addition, to achieve a landscape led response to the site opportunities and constraints, the proposal must be amended to indicate retention of H9, 10 and 11.

38. Land Use – developable area must be adjusted to exclude landscape boundary buffers/ green infrastructure.

Wider Masterplan Observations & Open Space Provision:

39. Existing corridors and landscape framework enhanced and indicated in the masterplan. Also, robust structural landscape buffers must be added, particularly to the site's north and western boundaries.

40. The provision of street trees to be considered from the outset and indicated in the masterplan.

41. The buffer to Oakwood Copse, protected by TPO/1060, should be clearly indicated, including exclusion of ancillary uses, such as pumping station, within the buffer.

42. Opportunities to secure long distance views of the SDNP escarpment and Church spire identified and secured within the masterplan.

43. The application forms part of a wider development concept of approximately 450 dwellings. The open-space requirements for the application parcel must therefore be considered alongside the distribution and coordinated delivery of open space across the wider masterplan area. Council's Open Space Calculator for 450 dwellings, population 1080 people, has therefore identified a need of approximately 5 hectares of open space. Each open space typology requirement is as follows:

				Open space required per person:			Multi-functional greenspace proposed / potential split:			Children and young people proposed / potential split:	
	occupancy assumption	number of units	calculated occupancy of scheme	Allotments 1.8m2 per person	Multi-functional greenspace 43.9m2 per person	Children and young people 0.7m2 per person	Parks and Gardens 13.8m2 per person	Amenity Greenspace 5.8m2 per person	Natural and Semi-Natural 24.3m2 per person	Children 0.5m2 per person	Youth areas and facilities 0.2m2 per person
				1.8	43.9	0.7	13.8	5.8	24.3	0.5	0.2
unknown	2.4	450	1080	1944	47412	756	14904	6264	26244	540	216
1 bed flats	1.2	0	0	0	0	0	0	0	0	0	0
1 bed houses	1.7	0	0	0	0	0		0	0	0	0
2 bed flats	1.3	0	0	0	0	0	0	0	0	0	0
2 bed houses	1.8	0	0	0	0	0	0	0	0	0	0
3 bed flats	1.7	0	0	0	0	0	0	0	0	0	0
3 bed houses	2.2	0	0	0	0	0	0	0	0	0	0
4+ flats	2.4	0	0	0	0	0	0	0	0	0	0
4 bed houses	2.7	0	0	0	0	0	0	0	0	0	0
5+ bed houses	3	0	0	0	0	0	0	0	0	0	0
			Area required for each typology (m2)	1944	47412	756	14904	6264	26244	540	216
			Area required for each typology (hectares)	0.1944	4.7412	0.0756	1.4904	0.6264	2.6244	0.054	0.0216

- Allotments - around 0.19ha; Landscape and Park and Countryside officers are of the view this should be located near the PRoW within the masterplan

- Parks and Gardens - 1.49ha; (primary purpose - *Urban parks, country parks and formal gardens, open to the general public. Accessible, high quality opportunities for informal recreation and community events. For the purposes of this study this also includes greenspace which may currently provide a sports pitch.*). Officers are of the view that this typology should be located in the central part of the masterplan and connectivity to PRoW is desirable.

- Amenity Green Space – 0.62ha; (primary purpose - *Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.)*

- Natural and semi-natural green space – 2.62ha

- Children – 0.054ha - the provision of one LEAP centrally located and LAPs to meet walkability requirements is recommended

- Young people – 0.02ha - the provision of an outdoor gym, sheltered seating and stages/dance spaces near a kickabout space, at the centre of the masterplan is recommended

44. Please refer to Part 8 of the OSSR: provision standards where what is expected for each open space typology is described. A land budget plan to demonstrate that the open space requirements generated by the development as a whole, can be secured in the right locations, allowing for the associated buffer zones, minimum accessibility requirements, minimum typology sizes, existing deficiencies, etc, compliant with the OSSR. It must include a table with each

proposed typology and associated quantities and block shapes that can be measured against. Please note SuDS areas can and should be included within the open space strategy but will not count towards the quantity requirements as these would be limited in its access and use.

45. It is important to note that while these are minimum requirement figures based on population, when the accessibility parameters and minimum space requirements for each typology are considered, the overall open space requirement may be higher. Therefore, the proposals must also be informed and include an accessibility analysis of the types of open space and facilities within walking distance of the development. The extract below is taken from the OSSR:

285. The recommended accessibility standards for HDC are set out in Table 9.2.1.

Table 9.2.1: Recommended accessibility standards

Open space type	Recommended Accessibility Standard
Parks & Gardens	1,000m
Amenity Greenspace	480m
Natural & Semi-natural Greenspace	300m (local) 1,000m (Sub-district/strategic)
Provision for children and young people	400m (Children) 1,000m (Sub-district/youth)
Allotment	1,000m

46. With respect to the provision for young people, please have regard to the importance of gender-inclusive design in recreation spaces for older children and young people. The council published an addendum to the OSSR.

ANY RECOMMENDED CONDITIONS: Not applicable at this stage

NAME:	Inês Watson CMLI Specialist Team Leader (Landscape Architect)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	23/10/2026