

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	New Place Nurseries London Road Pulborough West Sussex
DESCRIPTION:	Reserved Matters application pursuant to Outline Planning Consent DC/21/2321, as varied by application DC/24/1204. The Reserved Matters comprise details of 160 no dwellings, associated internal access roads, parking and landscaping for areas east of the right of way. Details of appearance, landscaping, layout and scale to be considered.
REFERENCE:	DC/24/1676
RE-CONSULT:	1 st set of comments in black 2 nd set of comments in blue 3 rd set of comments in green 4 th set of comments in purple
RECOMMENDATION:	Objection / More Information / Modification Objection / More Information / Modification Objection Objection / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

4th set of comments

Please consider these comments as an updated, combined response to highlight outstanding concerns and recommendations. Refer to previous responses for resolved concerns and closed comments.

We note and welcome the positive changes made to the scheme, particularly in relation to the central viewing corridor/open space and the changes to the retaining walls and levels treatment adjacent to the western basin. However, the encroachment of the proposed development into the central tree belt, and in particular the encroachment into the eastern tree belt, which forms the development eastern boundary, remains of key concern. As currently proposed the development does not adequately protect, conserve, or enhance the existing mature tree lines and green infrastructure, conflicting with key principles and Policies 25, 26, 31 and 33(6) of the HDPF.

While it is accepted that the loss of the central tree belt could potentially be mitigated and compensated through the submission of a robust methodology for replacement and compensatory measures, the eastern boundary does not benefit from the same level of flexibility. Its retention and enhancement, particularly given its position and function as a buffer between the proposed built form and the countryside, are critical to mitigating the adverse effects identified within the LVIA at outline stage.

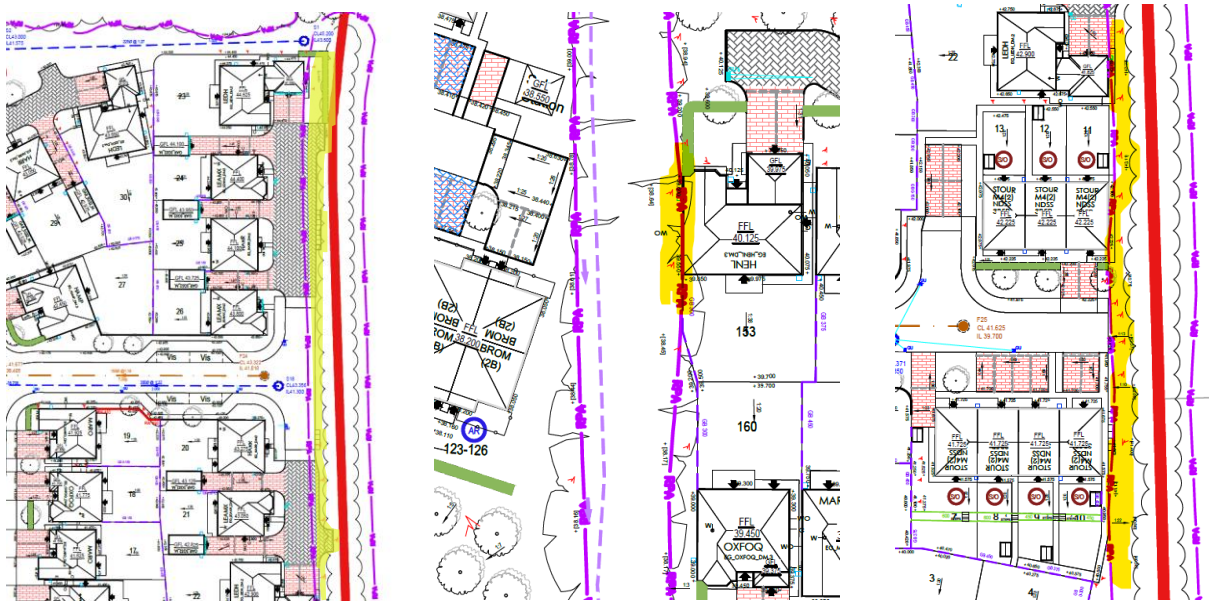
This proposed relationship is not considered to be acceptable and cannot be supported on landscape and visual amenity grounds.

Other issues remain unresolved and are discussed in detail below, noting where these could be secured by condition.

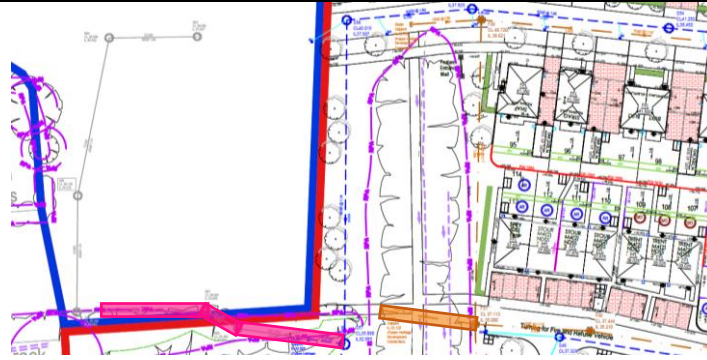
MAIN COMMENTS:

Development Framework & Existing Landscape Features

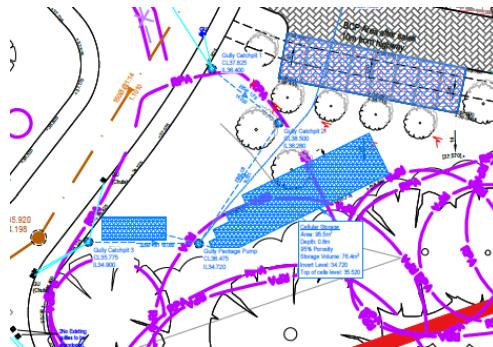
1. The viewing corridor remains diminished in comparison to previously approved plans and objectives, however changes to the layout are a positive improvement. In combination with a more considered approach to the open space strategy and footpath layout, we are satisfied with the changes and that the long-distance views are retained without excessive obstruction from built form.
2. As previously commented, 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. Where the areas of the site are undeveloped, we consider the layout can be adjusted to fully avoid RPAs, including SuDS features, noting that trees are highly susceptible to rapid decline due to sudden changes in their rooting medium, such as changes to hydrology, increased water levels or mounding.
3. No changes have been made in order to avoid RPA encroachment throughout the scheme, and further, proposals continue to not deliver the LVIA identified mitigation measure of retaining existing vegetation, nor the objective of providing a '*Soft development edge and enhanced boundary planting*'. The eastern boundary remains of key concern as the level of RPA encroachment places this treeline at risk of decline and future loss significantly undermining the proposed mitigation strategy, reviewed and accepted at outline stage. Please see examples highlighted in yellow below, noting that the encroachment will be considerably larger on account of necessary earthworks. We continue to request that built form be pulled west to avoid RPAs and create opportunities for the enhancement of the tree belt to be delivered, as identified within the LVIA.



4. An updated AIA and Tree Protection Plan (TPP) has not been provided. This must be submitted and reflect proposed earthworks and drainage proposals in order to accurately demonstrate the level of RPA encroachment, loss and removal of existing trees and vegetation.
5. In addition, we continue to request that layout is reviewed in order to avoid unnecessary loss of green infrastructure, as demonstrated by the submitted coordinated overlay plan. For example:
 - a. To minimise loss or deterioration to Category A G28, please modify foul run (orange, below) to align with proposed footpaths.



- b. G33 is noted to be retained in all plans except from the TPP. In any case, the proposed drainage run continues to give rise to unnecessary loss (pink, above). Please adjust the run to avoid this treeline, as previously requested, and amend the TPP to reflect retention in correlation with all other plans. If the loss of this feature is unavoidable, all plans must be amended to reflect the loss and replacement trees proposed.
- c. An attenuation crate is proposed within the RPA's of the southern treeline, compounding its deterioration. Please remove attenuation crate from the RPAs to minimise adverse effects to the landscape character and amenity of the area. This location is the gateway to the development and it is imperative that the existing landscape feature is retained.



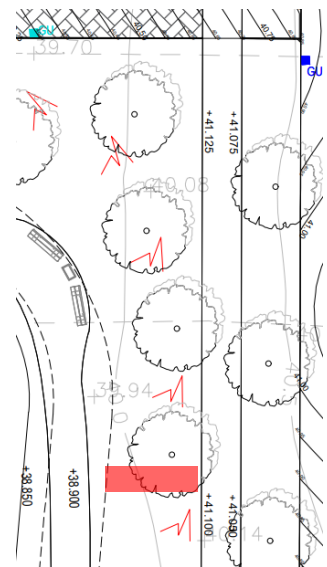
- d. There remains uncertainty with the Poplar treelines. These treelines were identified as a key structural feature that positively contributes to the landscape framework and embeds the scheme into the landscape. In line with enhancement objectives and to ensure their longevity, we continue to request that every removed tree is replaced with a species listed under 'Native Parkland Trees' within the Plant Schedule. Please amend the AIA, TPP, landscape masterplan, proposals and schedule accordingly. This information shall include the methodology and programme of works to deliver the replacement trees, noting that the Arboricultural officer in its last response dated 04/03/26, raised concerns that the '*current proposed approach of re-pollarding and patchy replacement will not give the longer term impact that a robust scheme of replacement using good quality nursery stock at this phase of planning process would procure*'.
- e. As above, there is inconsistency between plans and the part loss of G18 is thus unclear – see landscape proposals (below, left) showing retention and design overlay (below, right) showing removal. This potential loss is considered in excess, and while 5no. trees are delivered to the west, this is not considered appropriate mitigation, therefore more trees are expected in this area in order to extend the treeline closer to that removed. Replacement species must be detailed within landscape proposals in order to determine suitability, although this point of detail can be secured by condition if preferable.



Levels

The levels plan indicates overly steep gradients in places, significant drops and retaining wall heights. Which reflects how the scheme is imposing itself into the site rather than work with the existing and prevailing topography. While it is recognised that the permission is for the delivery of up to 160 dwellings (within this parcel, excluding the 10 units in the western parcel), and that some of these issues will be unavoidable in places, further consideration should be given to the following points:

6. Where changes to the proposed site levels cannot be avoided to better reflect existing landform, safety measures in accordance with relevant BS and building regulations are required alongside the footpaths. Examples include footpaths adjacent SuDS features.
7. Where embankments remain too steep, proposals for slope stabilisation methods are required. These should be provided as a typical detail and marked on a plan where required. As an example, the area highlighted in red, indicates a 1:2 slope but no method of stabilisation. Further, the footpath is adjacent to a significant drop with a steep slope in combination with the attenuation basin below. It is highly likely that future residents will request railings or some sort of barrier, even after a safety risk assessment is carried out and this arrangement is considered acceptable. We recommend the levels to be amended to reflect a gentler slope or both railings or deterrent planting and bank stabilisation measures added to the proposals.



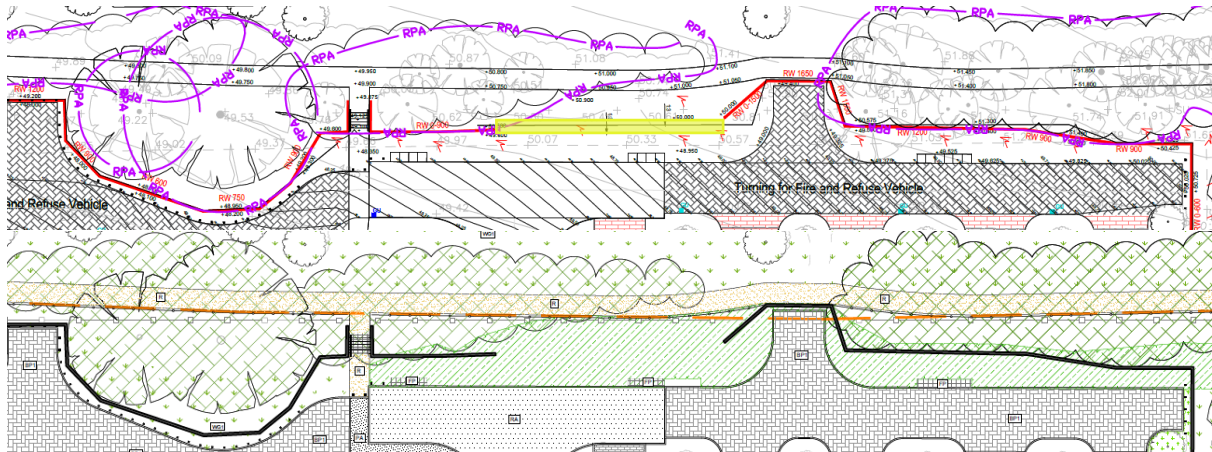
8. Where RPA's are encroached upon, the proposed methodology and details for the replacement tree and tree belt enhancement is required nothing that this will exclude the eastern tree belt where the layout is required to be adjusted, as detailed above. Examples (but not limited to) of this are given below.

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- The diagram is a detailed architectural floor plan of a building section. Key features include:
- Structural Elements:** A central vertical wall labeled "W LEAMX" with a note "EG. LEAMX DN.". To its right is a sloped roof structure labeled "FFL" with an elevation of "46.500".
 - Elevations and Levels:**
 - Top left: "36" with a slope of "1:20".
 - Left side: "GFL 46.350" and "GAR_SGS2.M.".
 - Top center: "46.350" with a downward arrow.
 - Center: "+46.320" and "WO" with an upward arrow.
 - Right side: "46.275 +", "46.425 +", and "46.4".
 - Bottom: "44.79", "45.17", and "45.40".
 - Annotations and Markings:**
 - A red rectangular area is highlighted in the lower center.
 - Purple curved arrows point from the left and right towards the red area, labeled with "79", "RPA", and "45.40".
 - Handwritten-style text "RPA" and "45.40" are present near the bottom.
 - Blue and red dimension lines and arrows indicate specific measurements and slopes.
 - Other Details:** A staircase is shown on the right side, and various other structural lines and symbols are present throughout the plan.

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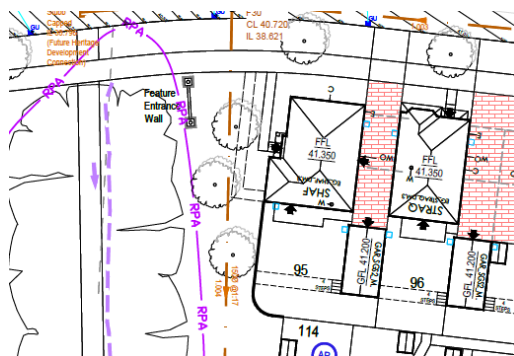
9. Some areas within the northeastern part of the scheme remain unresolved and are cause for concern. For example,
- Post and rail fence is now proposed to the south of the PRoW, which is welcomed, however this does not appear compliant with relevant standards, given the large gaps and the proposed drop in height. Please review.
 - Clarification on the heavy black line highlighted in yellow is required.
 - Level changes are indicated for the PRoW itself, however this would suggest earthworks within the RPA of the existing treeline.
 - The roadside gradients are overly steep and no method of slope stabilisation is proposed.



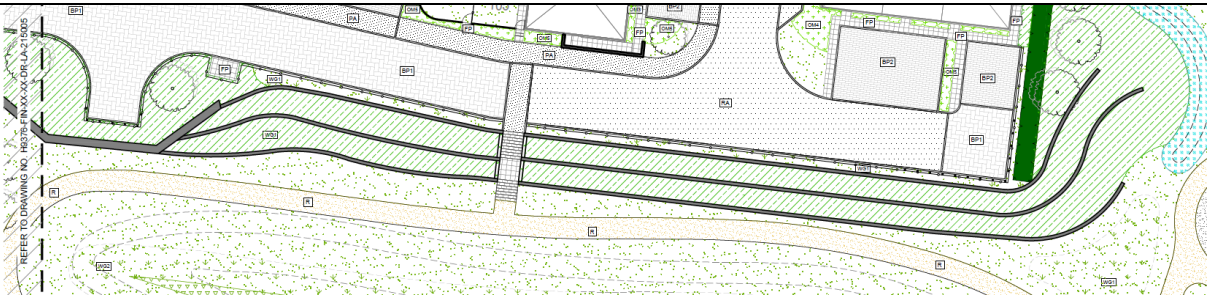
The realignment of the retaining wall to follow to the outline of the road (inclusive of curved edges for amenity value) is therefore requested. This will reduce overly steep banks but also reduce the encroachment and disturbance to the rooting medium of the existing treeline.

Landscaping Proposals and further comments. These changes are recommended for submission at this stage however, if not forthcoming, please secure through an appropriately worded condition:

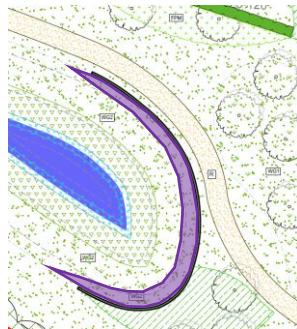
- As per point 5f and as previously requested, tree species and sizes must be labelled or identified within landscape proposals in order to assess suitability.
- Please relocate the proposed trees below to fall outside the foul run easement zone.



- Feature and/or tree planting is requested within the retaining walls, as opposed to native shrub planting, to provide further amenity value and soften the engineered appearance. In addition, the appearance and proposed material of the retaining wall must also be provided.



13. The newly proposed retaining walls within the attenuation basins create an overly engineered appearance, thus softening is required. Please include planting in front of the retaining walls, such as the example below highlighted in purple, for amenity value and safety purposes.



14. Please submit details of the bin/cycle stores. Given their visually prominent position from the footpath route, planting such as hedgerow is required to soften their appearance.



15. We note that pump track details are to be confirmed, this must be secured by condition.
16. Clarification is requested for the 'resin path' treatment. Please note that the recently submitted 'Hard Surfacing plan, Rev E, dated 05.06.2026' indicating that must of the footpaths around the site are to WSSC PRoW footpath or bridleway specification is not acceptable across the site and must be broken down into better quality materials, fully accessible all year round, particularly along the central green space and amenity areas.
17. Quantities must be added to the plant schedule, including proposed tree planting, as well as girth sizes. Street trees along the principal access road are required at a minimum 20-25cm girth. The central open space can include mix size species but must include within the mix some feature trees at key locations that range between 20-25 and 25-30cm girths.
18. The new LEAP location does not address the minimum 20m buffer requirement; the distance between the activity zone and nearest dwelling appears to be 12m. However, it is considered the position between footpaths to be positive for accessibility and informal surveillance. It is requested that the activity zone is slightly moved further north and introducing/relocating picnic tables and low level sensory planting in between the activity zone and the footpath. Buffer zones and walking distances must be indicated in a plan.
19. The provision of a kickabout area, mini orchard, perennial planting, boulder trail, as well as the removal of fencing in the countryside park/meadow, is welcomed. However, some tree planting is encouraged within the latter feature to provide interest and areas of shade.

The following comments are carried over from our previous response, and can also be secured via condition:

20. Landscape Proposals

- a. Mown grass should be labelled as such and/or given its own hatch in proposals, as opposed to reflecting strips of amenity grass within meadow.

21. Hard Surfaces

- a. Specification remains requested for the following treatments and structures:
 - i. Play surfacing
 - ii. Play equipment, benches & bins
 - iii. Entrance feature
 - iv. Headwalls – these are recommended to be naturalistic, such as cladding in Horsham stone

22. Planting Schedule

- a. 'Reeds and Aquatic', noted within proposals as 'Reedbed' and 'Aquatic/Marginal/Wetland' should be separated into their relevant categories given that aquatic species require permanent water levels.
- b. Further, no reeds are proposed; reedbed should thus be removed or the schedule amended to reflect native reed species inclusive of management within the LMP.
- c. While Hamamelis x Intermedia 'Arnold Promise' is welcomed in the planting schedule, it is not deemed appropriate as a street tree. Please include as an ornamental shrub and replace with a tree species with a taller height once established.
- d. Hedgerow and ornamental hedges should reflect 5 per linear metre, as opposed to 1.
- e. Please include heights for hedgerow species; we recommend 60-90cm.
- f. Please update the bulb planting densities as 1 per metre is not sufficient.

23. Planting Notes

- a. In order to ensure that establishment is not hindered by planting too deep, tree pit sizes should not be prescriptive. We recommend that tree pits are no deeper than the root system and at least one and a half times as wide. No fertiliser should be used. Please amend as necessary.
- b. More information is requested regarding the creation of wildflower meadow. Specific measures are required to ensure the successful establishment of wildflowers.

24. SuDS Management Strategy

- a. As previously commented, we strongly 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. Alternative methods for weeding should be considered such as hot foam or hot water systems, steel brushing in combination with acetic acid spraying, or electronic control systems. Please amend Section 3.1 to remove glyphosate from the permeable paving maintenance schedule.

25. Landscape Management Plan (LMP)

- a. As above, please amend the LMP to remove mention of herbicides and reflect alternative methods
- b. Stakes and ties should be removed upon successful establishment or after 4 years of planting, whichever is sooner. Please amend.
- c. More information is requested regarding the management of meadow management, as prescriptions will change yearly over the course of its establishment.

26. EV Layout

- a. Clarification remains requested that EV chargers do not block footpaths.

RECOMMENDED CONDITIONS: If you're minded to recommend the application for approval without the concerns addressed above. please get in touch as specific conditions will be required.

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	26/05/2026

SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	23/06/2026