South Downs
National Park Authority

Horsham District Council

Our Ref: SDNP/26/03908/ADJAUT
Contact Officer: Phillip Richards
Tel. No.: 01730 814810

17th November 2026

Dear Sir/Madam,

Neighbouring Authority Consultation

Applicant: Horsham District Council
Proposal: Adjoining Authority Consultation - Horsham District Council (S106/26/0042) - Discharge of planning obligations to approved application DC/21/2086. Open Space Scheme pursuant to Schedule 5, Paragraph 1.2 of the Section 106

Location: Land West of Ravenscroft, Storrington, West Sussex, RH20 4EH,

Thank you for your correspondence received 1 October 2026, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination.

The two statutory purposes of the SDNP designation are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage,
- To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes.

Section 245 of the Levelling-Up and Regeneration Act 2023 (S.245 duty) amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to 'seek to further the specified purposes of Protected Landscapes'.

The National Park's comments on the development are as follows:

Thank you for consulting the South Downs National Park Authority (SDNPA) on the above application. The SDNPA makes no comment on the principle of development. The site is located adjacent to the National Park boundary and is therefore considered to be within the setting of the National Park.

The SDNPA has reviewed the submitted Open Space Scheme insofar as the information provided relates to the National Park, its setting and the landscape and ecological management of the development.

Section 245 of the Levelling-up and Regeneration Act 2023 strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 and requires all relevant authorities including neighbouring local planning authorities to further the National Park's statutory purposes. The first purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Development within the setting of a national park is relevant in regard to the section 245 duty, and the NPPF 2026.

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, **while any development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."**

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination.

The statutory purposes and duty of the National Park are:

- Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage,
- Purpose 2: To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.
- Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

It is therefore important to consider direct and indirect effects upon the National Park designated landscape and its setting as well as its special qualities.

The National Park's comments on the development are as follows:

Background and National Park considerations

The SDNPA acknowledges that the principle of the development, including the provision of the community parkland, has previously been established through the planning appeals associated with the site.

The community parkland and associated landscape infrastructure remain particularly important components of the development given that part of the site falls within the South Downs National Park and the residential development immediately adjoins the designated landscape. The Authority's consideration of the present submission therefore focuses upon whether the proposed Open Space Scheme provides an appropriate basis for establishing and maintaining the landscape character, biodiversity, recreational and green infrastructure functions anticipated through the approved development.

Requirements of the Section 106 Agreement

The covering letter identifies that the Open Space Scheme must address the location and extent of open space; implementation and planting timetable; Management Scheme; Open Space Maintenance Sum; and relevant details of equipment, topsoil and seeding, tree planting, surface treatments, earthworks, drainage, fencing, seating and litter bins.

The submitted landscape plans, planting information and Soft Landscape Management Plan provide a basis for assessment. However, the Landscape Officer's review identifies substantive gaps and inconsistencies. The submission does not presently demonstrate that all requirements relating to the Community Park have been satisfactorily resolved, and the submitted Management Plan is too generic to serve as the final management framework for the Park.

Landscape Management Plan

A Community Park-specific Landscape and Ecology Management Plan (LEMP) should be submitted in place of reliance upon the current generic Soft Landscape Management Plan. The LEMP should be coordinated with the approved landscape drawings and the ecological mitigation and compensation measures established through the original Ecological Impact Assessment.

The LEMP should, as a minimum:

- include a plan clearly identifying each landscape and habitat management area;
- use terminology consistent with the landscape plans and clarify the area described as "Woodland";
- establish measurable objectives, implementation methods and management prescriptions for each habitat type;
- address existing pasture, wet grassland, proposed meadow, trees, hedgerows, scrub, scrub encroachment and invasive species;
- set out habitat monitoring, review and adaptive management arrangements;
- demonstrate how secured ecological mitigation and compensation measures will be delivered and maintained; and
- provide a clear mechanism for management beyond the detailed 15-year period presently covered.

Open space and green infrastructure

The northern parcel plan identifies 9,237 mï¿½ of soft landscape, including 3,193 mï¿½ of public open space and a 1,903 mï¿½ ecological corridor. This provides a positive basis for a connected green infrastructure network between the residential development, Community Park and National Park. However, further refinement is required to demonstrate that the proposed landscape features will function successfully.

- Hard surfacing: Opportunities should be explored to rationalise unnecessary pedestrian surfacing and increase soft landscape provision, given the substantial extent of hard landscape within the residential parcel.
- Ecological corridor: The purpose of gated access should be clarified. If access is for maintenance only, the scheme should demonstrate how informal access, garden encroachment and garden-waste deposition will be prevented.
- SuDS and drainage: SuDS should be integrated as part of the landscape and ecological framework rather than treated predominantly as engineered infrastructure. Levels and relationships with surrounding planting should be clarified.
- Planting establishment: Tree species, eventual size, hedgerow diversity, soil depths, uncompacted rooting volumes and conflicts with drainage easements or services should be resolved.

Community Parkland, Landscape and Ecology

The intention to retain existing vegetation and provide meadow grassland, wet grassland, native scrub, new hedgerows, trees and informal access is supported in principle. Nevertheless, a more site-specific and habitat-led approach is required.

- Existing pasture and grassland: The middle and southern fields contain established pasture and areas of scrub. Their existing botanical and ecological value should be assessed before vegetation or topsoil is removed. The revised scheme should distinguish between areas where habitat creation is necessary and areas where existing grassland should be retained and enhanced through sensitive management.
- Wildflower establishment: Reliance on a general-purpose commercial wildflower mix is not adequately justified. Seed mixes, ground preparation and management should respond to existing vegetation, local species diversity and the intended habitat objective.

- Wet grassland and water features: The existing pond, north-south ditch and wet grassland should be considered together. Topographical and ecological information should inform whether these features can be restored or better connected to support wet grassland, water retention and ecological resilience.
- Trees and hedgerows: The amount and distribution of new tree planting should respect the open character of the fields and views towards the chalk ridge and Chantry Hill. Boundary planting and hedgerow trees may reinforce landscape structure and foraging corridors while retaining openness. Species selection, soil depth, uncompacted rooting volume and compatibility with infrastructure must be demonstrated.
- Access and recreation: Public access should respond to habitat sensitivity. Access should be excluded from retained wet grassland and appropriately restricted where required to protect ecological function. The route hierarchy and surfacing should be clearly shown and should retain an informal rural character.
- Play and infrastructure: Play can be accommodated in principle, but should be landscape-led and naturalistic. Details of seating, litter bins, signage, interpretation, fencing and gates should be provided where required and designed to avoid unnecessary urbanisation. No lighting is expected within the National Park part of the site.

Matters requiring further confirmation

A number of matters require resolution before Horsham District Council discharges the Open Space Scheme obligation pursuant to Schedule 5, paragraph 1.2.

1. Open Space Maintenance Sum

The Open Space Maintenance Sum remains to be confirmed. As this is an express requirement of Schedule 5, paragraph 1.2, HDC should ensure that the appropriate sum and associated arrangements are agreed before discharge.

2. Earthworks, drainage and levels

The covering letter indicates that earthworks, excavation, construction and drainage details would be addressed through a subsequent CEMP. HDC should confirm that this approach is consistent with the requirements of the S106 Agreement. Further information is also required to understand the relationship between the Community Park, pond, north-south ditch and wet grassland. Appropriate topographical and drainage information should inform whether these features can be integrated to support wet grassland habitat, water retention and ecological resilience.

3. Community Park infrastructure and access

Details of fencing, gates, seating, litter bins, signage, interpretation and play infrastructure should be clarified where required. Such features should be sensitively located and designed to maintain the informal and rural character of the Community Park and avoid unnecessary urbanisation. Public access should also respond to habitat sensitivity. The final scheme should distinguish clearly between recreational routes, maintenance access and areas where access should be restricted, including the retained wet grassland. Path treatments should also be clarified.

4. Community Park-specific LEMP

The submitted Soft Landscape Management Plan is too generic to provide an appropriate management framework for the varied habitats within the Community Park. A Community Park-specific Landscape and Ecology Management Plan (LEMP) should therefore be provided and coordinated with the detailed landscape plans and original ecological mitigation and compensation measures.

The LEMP should:

- clearly identify each landscape and habitat management area;
- use terminology consistent with the landscape plans and clarify the area identified as "Woodland";
- establish specific management objectives and prescriptions for pasture, wet grassland, meadow, hedgerows, trees and scrub;
- address scrub encroachment and invasive species;
- provide appropriate monitoring and review arrangements; and
- clearly establish how ecological mitigation and compensation measures will be delivered and maintained.

5. Grassland, trees and planting

The revised proposals should have greater regard to the existing botanical value of the Community Park. Existing grassland should be retained and enhanced through appropriate management where this would provide a better ecological outcome than removing vegetation and topsoil and establishing a general-purpose wildflower mixture. Tree and hedgerow proposals should similarly respond to local landscape character and biodiversity. Appropriate soil depths, uncompacted rooting volumes and establishment conditions should be demonstrated relative to the species and ultimate size of trees proposed, together with suitable species diversity within proposed hedgerows.

6. Ecological mitigation and long-term management

The revised landscape plans and LEMP should clearly demonstrate how the ecological mitigation and compensation measures associated with the approved development are incorporated into the scheme, including their location, extent, implementation and subsequent management.
Long-term arrangements should also ensure that the landscape and ecological functions of the Community Park are maintained beyond the detailed management period covered by the submitted Management Plan.

Conclusion

The SDNPA supports the principle and broad landscape and ecological objectives of the Open Space Scheme. The proposed Community Park has the potential to conserve and enhance landscape character and biodiversity while providing recreational and educational benefits appropriate to its National Park location.

However, the submitted details are not presently sufficient to support discharge of Schedule 5, paragraph 1.2. The current Soft Landscape Management Plan is too generic, and further coordinated landscape and ecological information is required, particularly in relation to existing pasture and wet grassland, wildflower establishment, water features, tree planting and growing conditions, habitat-sensitive access, ecological compensation measures, implementation and long-term management.

The SDNPA therefore recommends that Schedule 5, paragraph 1.2 is not discharged at this stage. A revised Community Park-specific LEMP and supporting landscape and ecological information should first be submitted and agreed, and the Maintenance Sum and other outstanding requirements of the obligation should be satisfactorily resolved.

Subject to these matters being addressed, the SDNPA would be likely to support the subsequent discharge of the Open Space Scheme obligation.

Yours faithfully



TIM SLANEY
Director of Placemaking
South Downs National Park Authority

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