

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Lower Broadbridge Farm Billingshurst Road Broadbridge Heath Horsham
DESCRIPTION:	Reserved matters application for the erection of 133 dwellings following approval of outline application DC/22/1052 as amended by DC/25/1886, relating to appearance, landscaping, layout and scale
REFERENCE:	DC/26/0592
RECOMMENDATION:	More Information / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

Current proposals indicate a reduction in open space, a significant dilution of tree planting, and deviance from the Landscape Strategy submitted under previously approved DC/22/1052. Of key concern is the relationship between the attenuation basins and existing landscape features, which should be reviewed to avoid further erosion of landscape character.

Modification is required in order to deliver a landscape strategy closer to previously submitted under DC/22/1052 and to ensure plans demonstrate consistency. Please see comments and recommendations below which aim to support the delivery of a high quality, landscape led design that complies with Horsham District Council's *Open Space, Sports & Recreation Review 2021* (OSSR) and HDPF Policies 25, 26, 31, 32, 33 and 43.

MAIN COMMENTS:

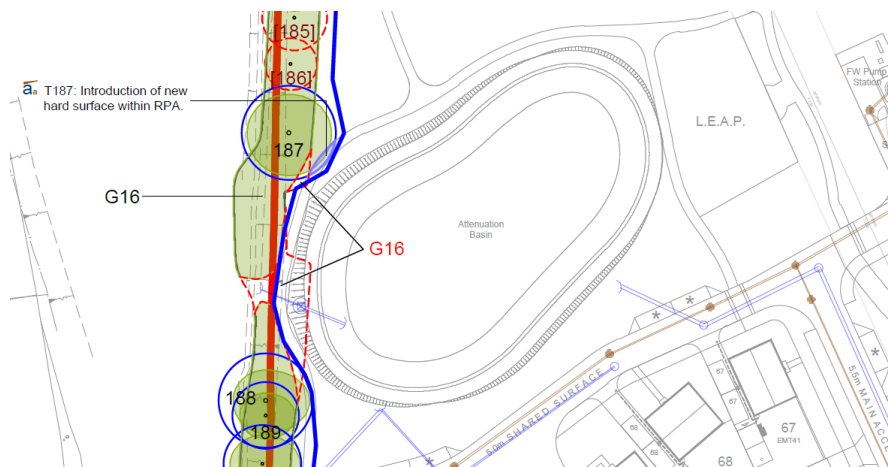
Key Principles - Context

1. In order to mitigate adverse effects on landscape character and visual amenity, and to comply with HDPF Policies 25, 26, 31 and 33, existing vegetation must be protected, conserved and enhanced.
2. In order to safeguard the existing green infrastructure bounding and within the site, proposals must:
 - a. Demonstrate compliance with BS 5837:2012 and as such, development within root protection areas (RPAs) should only be observed where unavoidable.
 - b. Avoid existing trees and vegetation backing onto garden plots or being enclosed within residential curtilage whenever possible, to secure their long-term retention and sympathetic relationship with future occupants of the site.
3. 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.
4. Proposals set within undulating or sloping topography must be considered sensitively and must naturally assimilate within the receiving landscape without significant cut and fill.

Dramatic changes in topography will be resisted as they may give rise to adverse effects on landscape character and visual amenity.

Existing Landscape Features – Action required

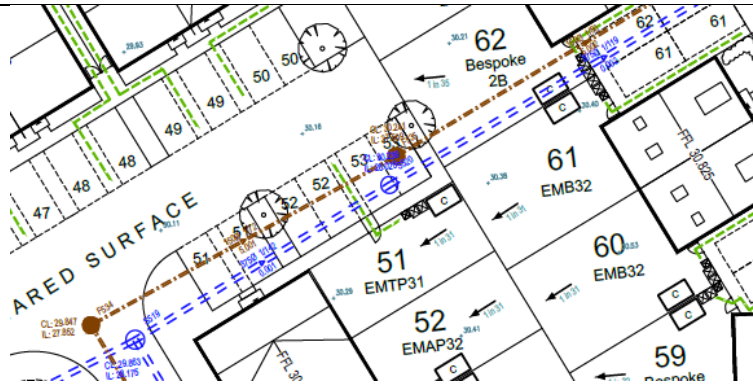
5. It is noted that the HDC Arboriculturalist has raised no arboricultural concerns in regard to the existing mature treelines that bound the site, however, concern is raised on landscape grounds. These treelines are a key feature of the receiving landscape and positively contribute to its rural qualities. Their loss or deterioration would have an eroding effect on the local landscape character, thus the principles set under points 2 and 3 must be adhered to.
6. As per point 2b in particular, the boundaries of plots 16-21 must be altered to include a maintenance strip between the private gardens and the existing treeline. In addition, avoiding RPAs in private gardens is preferred and recommended where possible.
7. Adjustment of the northern attenuation basin further east is requested in order to avoid encroachment of T187 and to limit removal of G16, which is noted to provide partial screening. Altering the location would also provide opportunity to strengthen boundary planting. Please amend.



8. A levels plan, preferably detailing existing and proposed contours in combination with the locations of root protection areas, is required at this stage in order to ensure the development naturally assimilates within the receiving landscape, as per point 4.
9. The 3no. attenuation basins and surrounds are of key concern. As per the OSSR, these must not look like steep sided engineered structures, must blend aesthetically into surrounding contours, and must not have gradients exceeding 1:3. Further, safety fencing is not desirable in these locations, so changes to levels must be gentle. More detailed information is thus required, as above, and cross sections are recommended.
10. To a lesser degree, while no concern is raised regarding the road layout, the level of vegetation loss and tree removal is likely to be greater than indicated on account of earthworks related to the access road. Given the level of fragmentation already indicated, any further loss must be detailed more accurately in plan in order to provide appropriate mitigation measures.

Potential Conflicts – Action required

11. A plan demonstrating coordination of the landscape strategy with underground services and existing easement zones is required at this stage to ensure that it can be delivered and that it is not diluted later on in the process.
12. Discrepancies are noted between the Landscape Proposals, Drainage Strategy (DS) and the Tree Protection Plan (TPP), therefore these must be updated to demonstrate consistency, as above.
13. Multiple areas are noted where trees are proposed in proximity to underground services. The inclusion of tree root barriers is noted and welcomed within the Planting Specification, however in order to ensure that proposed trees have a sufficient volume of rooting medium in order to successfully establish and survive, the following is requested:
 - a. The adjustment of service runs to use a single trench. See example below.



- b. Trees within and adjacent to hard landscape to be inclusive of root cells. Details to be included within the Planting Specification and Tree Pit Details.
- c. Relocation of the 6no. trees along the southwestern boundary within the existing sewer easement zone. See below:



Landscape Strategy – Action required

- 14. The Landscape Strategy has been significantly diluted, therefore major modification is required in order to deliver closer to previously submitted under DC/22/1052. Of key concern is the large reduction of proposed trees; there are currently only 173 proposed compared to 322 within the Landscape Strategy under DC/22/1052. This is most acute in open spaces, for example, the open space to the north only has 37 proposed trees compared to 100 previously indicated. Please amend.
- 15. Species proposed also significantly deviate from those indicated under DC/22/1052. The previously submitted Landscape Strategy palettes had a much wider range of species selected for both biodiversity and amenity benefit. While slight changes are acceptable, the current degree of change is not supported, thus the schedule must be amended to reflect previously submitted species. We highlight the following in particular:

a. Trees

- i. The previous palette included 14 different species of open space and native boundary trees and 12 further species of internal ornamental and street trees, amounting to 26 species overall. However, current proposals include a total of only 11 species (cultivars notwithstanding), some of which are newly proposed. Further diversity is required in combination with differentiation between internal/street trees and open space/boundary trees; please amend closer to previously submitted.

b. Hedgerow

- i. Previously proposed mixed native hedgerow is absent from the scheme, both in plan and in the schedule. Please amend.
- ii. Internal hedgerows were to comprise Hornbeam (*Carpinus betulus*), Ligustrum ovalifolium (Privet), Osmanthus x burkwoodii, Skimma spp, Prunus spp and Escallonia spp. However, current proposals indicate solely Eleagnus x Ebbingei, Griselinia littoralis and Carpinus betulus. Please amend.

- 16. Acoustic fencing is absent from the southwestern parcel. Please clarify and amend accordingly.
- 17. Acoustic fencing was proposed as being 'encompassed' by native hedgerow planting, however this is now absent from proposals. Please reinstate.
- 18. The inspector noted under 168 of the Appeal Decision that the creation of a new wetland feature was to be delivered with measures to control and prevent the distribution of pollutants

and contaminants to existing watercourses. This is absent from both the Landscape and Drainage strategies. Please amend and clarify.

19. The Landscape Strategy under DC/22/1052 incorporated shrub planting and marginal planting within attenuation basins, detailing wetland meadow in combination with marginal species as well as Dogwood (*Cornus sanguinea*), coppiced Willow (*Salix* spp), Alder (*Alnus glutinosa*), Downy Birch (*Betula pubescens*). Current proposals solely indicate meadow mixture, which is not supported. Please amend, noting that some marginal species proposed under DC/22/1052 require permanent levels of water, therefore this must also be detailed in proposals.



[LEFT] DC/22/1052 Landscape Strategy, [RIGHT] current proposals

20. The Landscape Strategy under DC/22/1052 incorporated extensive structural native planting to reinforce the boundaries, provide a green setting to the development and add to the localised green infrastructure. This is absent from current proposals; see example below of only 6no. trees being proposed along the northeastern boundary. Please amend.



[LEFT] DC/22/1052 Landscape Strategy, [RIGHT] current proposals

21. Similar to the above, the Landscape Strategy under DC/22/1052 proposed native tree, hedge and shrub planting along the eastern boundary to to maintain the green character of the road corridor and soften views of built form. This now appears to be almost entirely absent, in combination with the absent acoustic fencing hedgerow (point 17). Please amend.



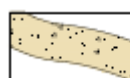
[LEFT] DC/22/1052 Landscape Strategy, [RIGHT] current proposals

22. The fragmented treeline to the southwest previously indicated tree planting either side, extending and enhancing it as a landscape feature. While cognisant that this area is now proposed as amenity space, there remains scope for tree planting to the northeast of the treeline. Please amend.



[LEFT] DC/22/1052 Landscape Strategy, [RIGHT] current proposals

23. 'A', 'B' and 'C' labels are noted within plans, however they are not included within the legend. These are assumed to be lighting bollards, however it is unclear. Please label accordingly to ensure no conflict with landscape proposals.
24. There is disproportionate use of *Lonicera nitida* and *Lonicera pileata* within the proposals, both of which provide minimal benefit yet comprise 20% of Shrub Mix 1 and 40% of Shrub Mix 2. Please remove *Lonicera pileata* and reduce quantities of *Lonicera nitida*, allowing for higher floristic diversity and more ornamental interest, in line with the previously submitted palette.
25. Bulb planting is noted within plans, however no bulbs are listed within the schedule. Please amend.
26. As per 212 of the Appeal Decision, details of management of the open space and the management company are required at this stage.
27. In addition, the Inspector made reference to evergreen varieties of trees to be determined during reserved matters, however none are proposed within the schedule. Please incorporate and amend.
28. 215 and 217 of the Appeal Decision makes reference to proposed planted bunds. These appear to be absent from proposals, however a levels plan has not yet been submitted (see point 8). Please amend and/or clarify.
29. As per 206 of the Appeal Decision, details of the acoustic fence, including its appearance and location are necessary in the interests of the appearance of the proposed development and to ensure an acceptable level of amenity for future residents. Please provide details.
30. Please amend boundary treatments to Plots 1 & 11 as brick wall as they abut amenity space.
31. The private garden area boundaries of plots 16-21 must be clearly detailed in plan, however these need relocating in any case, as per point 6. Please amend.
32. The following hatches and labels are unknown; please clarify and add details to proposals:
- What treatment is 'recreational footpath/cycleway'? Please note that Breedon self-binding gravel, CEDEC gravel, or similar is preferred in this location.



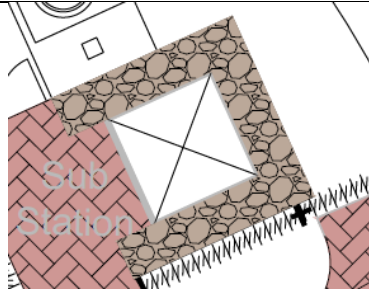
**RECREATIONAL FOOTPATH /
CYCLEWAY**

- What is garden separation fencing?



GARDEN SEPARATION FENCING -
Garden separation in accordance with developers specification.

- What is the beige/stone hatch around the substation?



Open Space Strategy – Action required

33. While the generous provision of Natural and Semi-Natural (NSN) space is noted, it is regrettable that the provision of open space has reduced in size since that submitted at outline stage. Constraints are noted, however given this reduction in quantity in combination with the non-usable areas allocated to attenuation basins, improvements must be made to proposals in order to deliver a high-quality scheme that aligns with the requirements of the OSSR and complies with HDPF policies 32 and 43.

We therefore request that the allocations better reflect the descriptions of typologies as set out within the OSSR. For example, the description of the Parks and Gardens typology (highlighted in orange [below, right]) is as follows:

Covers urban parks and formal gardens (including designed landscapes), which provide accessible high-quality opportunities for informal recreation and community events.

The areas highlighted are not considered to reflect this description, but rather a combination of Amenity Greenspace and NSN space. Please see section 8.2.2c of the OSSR and amend. We recommend the provision of ornamental planting with high horticultural and seasonal interest, generous provision of seating and public art.



[LEFT] DC/22/1052 layout, [MIDDLE] current layout, [RIGHT] current land budget plan

34. Further, while not of key concern, the Amenity Greenspace to the southwest of the scheme (light green, above right) should be redrawn to exclude NSN space (the existing mature treeline) for its quantity calculations.

35. As per the OSSR, the following is required in regard to the LEAP:

- Dog fouling bin in addition to bin proposed. Note that these should continue to be located outside the play area.
- Proposals meet the minimum of five play opportunities, however an additional opportunity is requested to be provided that is inclusive and accessible for children with disabilities.
- Creatively designed and suitably located seating should be provided for children in order to encourage social play.

36. There appears to be a boundary treatment to the outside of the hedge bounding the LEAP – please can clarification be provided on what's being proposed here?

Additional Landscape Details – Action requested

37. Please amend trees lining the access road from the roundabout to reflect semi-mature.
38. Areas labelled 'Ornamental Shrub/Herbaceous/Grass Planting' solely comprise of shrubs, of which a high proportion are not deemed to be of high amenity or biodiversity benefit (see point 24). Please introduce herbaceous and grass planting in combination with flowering shrubs, particularly in areas within open space (such as the southwestern parcel), for amenity and biodiversity benefit.
39. Timber equipment is preferred to have steel footings to prolong longevity and avoid rotting. Please amend.
40. Play area signage is noted within LEAP proposals. Detailed design can be secured via condition, however can be provided at this stage if preferable.
41. Interlocking rubber tiles are not recommended as they are prone to failure. Please amend safety matting to an alternative, compliant, impact absorbing surface, such as rubber mulch. Certified wood or bark chippings are also welcomed, subject to appropriate management measures; see point 26.
42. Please detail garden fence cut-outs within proposals, as per 159 of the Appeal Decision. The inclusion of habitat piles and bird and bat boxes is also recommended for completeness.
43. 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, particularly wildflower meadows. Alternative methods for weeding should be considered, except for Schedule 9 species; please refer to pan-uk.org for guidance and [resources](#). The Planting Specification should be amended accordingly to remove mention of herbicides and reflect alternative methods or hand weeding alone by careful digging or selective scything.
44. As above, alternative methods are requested for establishing meadow planting. Please review.
45. Please amend tree planting notes in the Planting Specification to reflect:
 - a. Tree pit size to be no deeper than the root system and at least one and a half times as wide.
 - b. Base of tree pit should be left undisturbed unless significant drainage problems are apparent. As such, please remove geotextile wrapped drainage layer as it is considered unnecessary and introduces avoidable synthetic materials into the planting environment.
46. As above, please remove the geotextile weed suppressant membrane from the Ornamental Planting sections of the Planting Specification 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.
47. Please add note to remove stakes and guards upon successful establishment or after 4 years of planting, whichever is sooner.

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:	09/06/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	11/06/2026