

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
RE-CONSULT:	1 st set of comments in black 2nd set of comments in blue
RECOMMENDATION:	More Information / Modification More Information / Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

[2nd set of comments](#)

While positive amendments and some concerns have been addressed, with thanks, modification and more information remains required. It is expected for a scheme of this scale to provide high quality spaces, therefore it is regrettable that amenity greenspace provision has been further reduced within this submission. Modification, particularly within the northern open space, is thus required.

In addition, proposals must mitigate adverse effects on landscape character, and there is currently insufficient information to demonstrate that the mature trees bounding the site will not be impacted by proposed earthworks. Further amendments to the planting palette and tree provision are also continued to be requested as mitigation, in line with proposals approved under DC/22/1052.

1st set of comments

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.

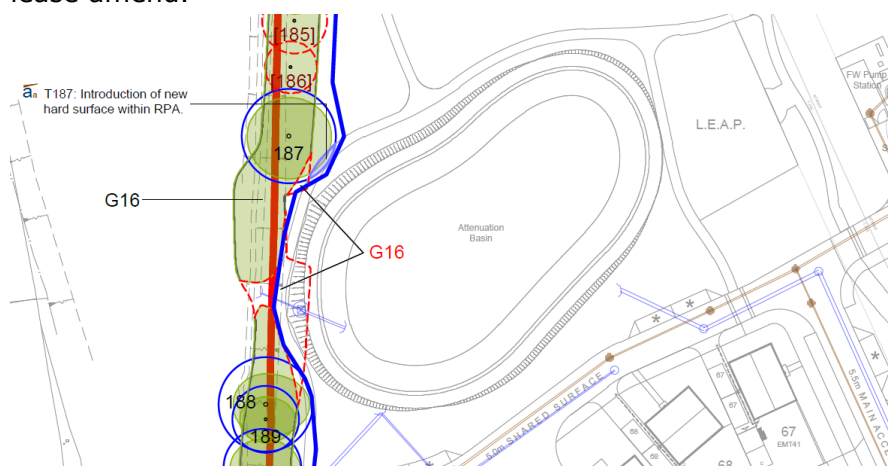
MAIN COMMENTS:

[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.
This continues to be recommended, however on this occasion, closed.
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.



The northern attenuation basin has been adjusted and 4no. additional trees are proposed, with thanks. Nonetheless, while the partial removal of G16 is necessary to construct the headwall, the level of removal proposed appears somewhat unnecessary given the altered layout. In any case, an updated Tree Protection Plan (TPP) is requested to reflect the updated layout, minimising removal where/if possible.

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.

A levels plan has been provided under S106/26/0022, with thanks. However, proposed levels have only been detailed for roads and SuDS features, and much of the open space levels proposals remains unclear, including the relationship between proposed levels and existing boundary vegetation. In some cases, there appears to be encroachment into RPAs as result of

the layout changes, which has not been considered within the TPP and Arboricultural Method Statement. The loss or deterioration of these trees would result in adverse effects to the landscape character and amenity of the area, thus their longevity should be secured (see point 5). Existing and proposed contour lines therefore remain requested to understand the effects of earthworks on existing landscape features.

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.

Scale notwithstanding, amendments to the northern basin including gentler gradients are welcomed. Both southern basins, however, while not exceeding 1:3 slopes, appear imposing on account of their depth and raised bunds. Amendments are strongly recommended, however the constraints posed at this stage are acknowledged. Closed.

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.

While an updated AMS remains recommended, additional tree planting is noted, with thanks. Closed.

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.

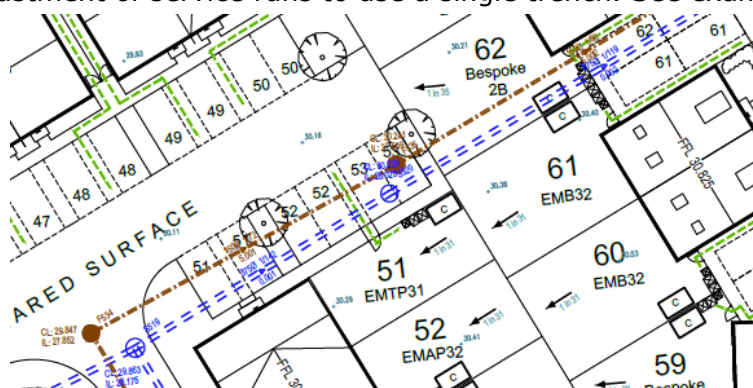
Not yet addressed; to be secured via condition.

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.

The TPP has not been updated. Please update and provide to demonstrate consistency between proposals.

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.

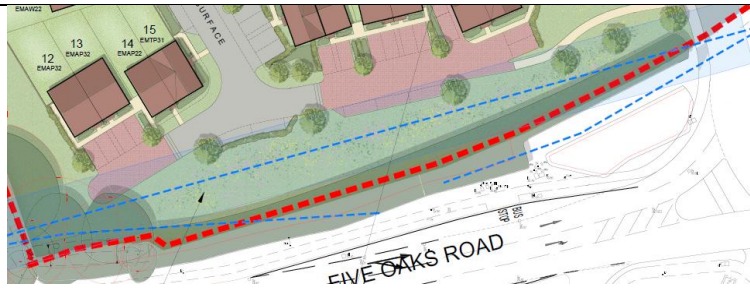


Not yet addressed; to be secured via condition.

- 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.

Not yet addressed. Please provide an updated Planting Specification and Tree Pit Details, or justification for not proposing root cells. This can alternatively be secured via condition.

- c. Relocation of the 6no. trees along the southwestern boundary within the existing sewer easement zone. See below:

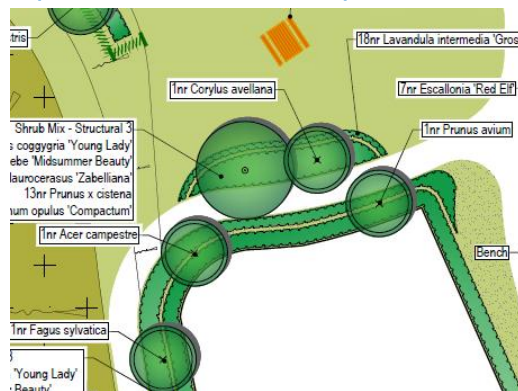


Amended, with thanks. Closed.

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.

263 trees are now proposed. This figure remains considerably less than the 322 originally proposed under DC/22/1052, however the increase is welcomed. It is noted, however, that not all trees have labels; see below for an example. Please amend the planting schedule and plans to ensure consistency. This can alternatively be secured via condition.



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

- 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.

Amended, with many thanks. Closed.

b. Hedgerow

- Previously proposed mixed native hedgerow is absent from the scheme, both in plan and in the schedule. Please amend.

Amended, with thanks. Closed.

- Internal hedgerows were to comprise Hornbeam (*Carpinus betulus*), Ligustrum ovalifolium (Privet), Osmanthus x burkwoodii, Skimmia spp, Prunus spp and Escallonia spp. However, current proposals indicate solely Eleagnus x Ebbingei, Griselinia littoralis and Carpinus betulus. Please amend.

Fagus sylvatica has been included within the palette as opposed to the remaining species listed above. Closed.

16. Acoustic fencing is absent from the southwestern parcel. Please clarify and amend accordingly.

It is noted within the letter dated 18/08/2026 that the extent of acoustic fencing has been reduced due to updated acoustic requirements. Closed.

17. Acoustic fencing was proposed as being 'encompassed' by native hedgerow planting, however this is now absent from proposals. Please reinstate.

Korean privet (*Ligustrum ovalifolium*) is now proposed alongside the western side of the acoustic fencing and mixed native instant hedging (min. 1.5m tall 'Eco Hedge' by Robin Taachi Plants (or similar)) is proposed alongside a portion of the eastern side of the acoustic fencing. While no concerns are raised with the 'Eco Hedge', the Korean privet would introduce a more suburban, ornamental appearance, which we are trying to avoid. Please replace the *Ligustrum ovalifolium* with 'Eco Hedge' or the Native Hedgerow mix.

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.

Not yet addressed. Please amend and clarify.

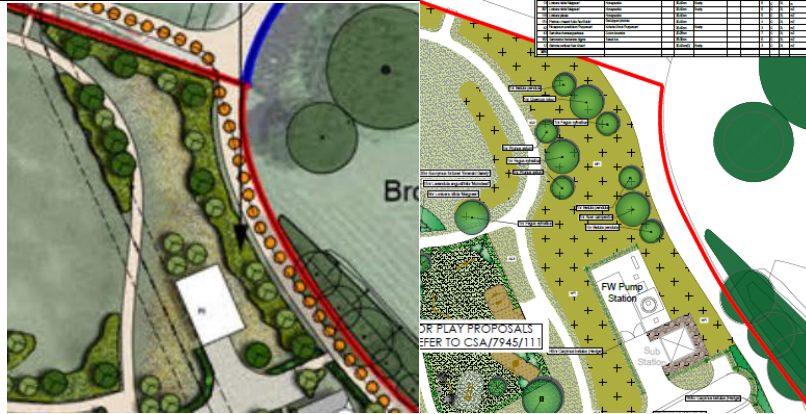
19. The Landscape Strategy under DC/22/1052 incorporated shrub planting and marginal planting within attenuation basins, detailing wetland meadow in combination with marginal species as well as Dogwood (*Cornus sanguinea*), coppiced Willow (*Salix* spp), Alder (*Alnus glutinosa*), Downy Birch (*Betula 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

Some amendments are noted, with thanks. Nonetheless, further marginal planting is recommended, particularly within the northern basin, and the species highlighted above continue to be requested in proximity to the basins. Further, *Caltha palustris* is proposed in areas that are intended to be dry. This species requires permanent levels of water and thus should be located where this can be ensured and/or replaced with alternative flowering species. Further amendments are thus required, although these can be secured by condition if preferred.

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

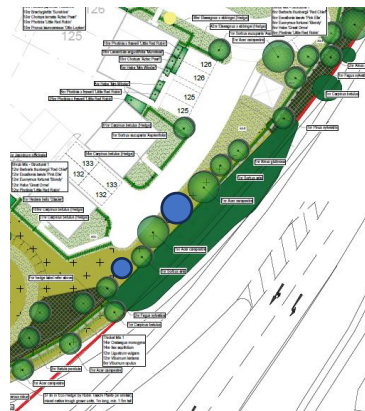
Amended, with many thanks. Closed.

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

Some amendments made. While planting is not expected to replicate that proposed under DC/22/1052, further provision is requested. Please consider supplementing 2no. additional trees highlighted in blue, below.



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

Amended, with thanks. Closed.

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.

Labels have been updated to reflect indicative locations of lighting columns. Specification to be secured via condition. Closed.

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.

Choisya ternata 'Aztec Pearl' is a welcomed alternative to *Lonicera nitida* 'Maigreen', however *Photinia* 'Little Red Robin' is not supported as an alternative to the other *Lonicera* spp. within Shrub Mixes 1 & 2 due to its equally limited benefits and maintenance requirements. As above, please consider species for higher floristic diversity and interest, such as *Cistus corbariensis*, *Hypericum* spp, *Skimmia* spp or *Potentilla fruticosa* spp.

25. Bulb planting is noted within plans, however no bulbs are listed within the schedule. Please amend.

Amended, with thanks. Closed.

26. As per 212 of the Appeal Decision, details of management of the open space and the management company are required at this stage.

Not yet addressed. Please provide details or justification for the omission.

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.

6no. *Pinus sylvestris* are now proposed. Further provision is recommended, however this concern is now resolved. Closed.

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.

No bunds appear to be proposed. Closed.

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.

Not yet addressed. While planting is now proposed, details of its appearance remain requested, as per 206. Nonetheless, this may be secured via Condition 13.

30. Please amend boundary treatments to Plots 1 & 11 as brick wall as they abut amenity space.

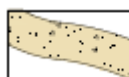
Amended, with thanks. Closed.

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.

1800mm high closeboard fencing and 2400mm high acoustic fencing is now detailed, with thanks. Closed.

32. The following hatches and labels are unknown; please clarify and add details to proposals:

- a. 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**

Updated to reflect '*Compacted, fine-screened surface 'Golden Amber' by Breedon Aggregates or similar*', with thanks. Closed.

- b. What is garden separation fencing?

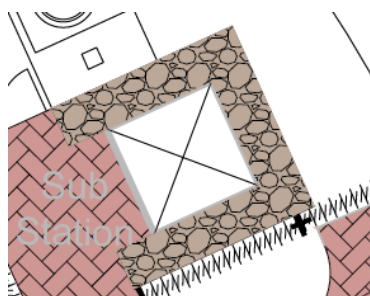


GARDEN SEPARATION FENCING -

Garden separation in accordance with developers specification.

Updated to reflect '*1.8m timber larch lap panels, between timber posts, treated softwood*', with thanks. Closed.

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

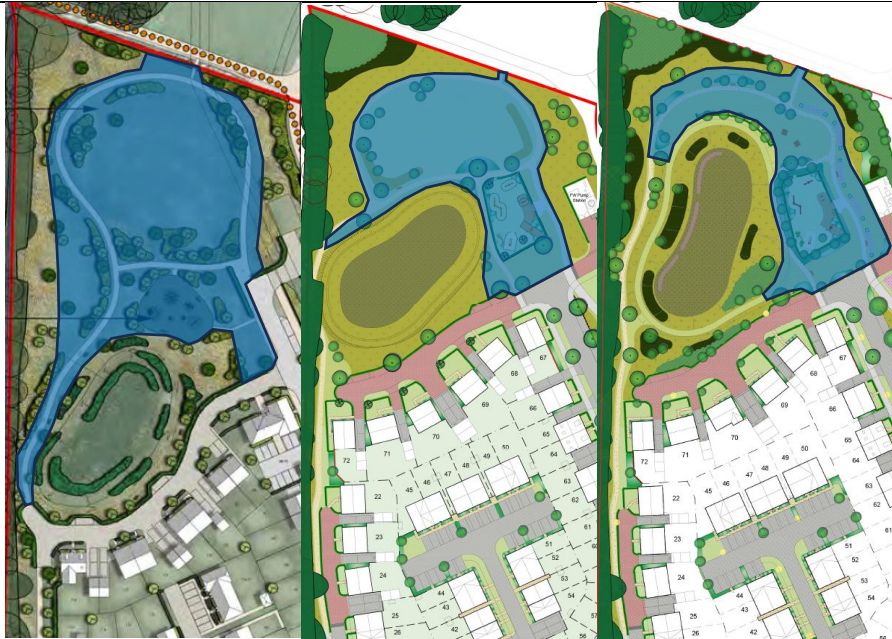


Hatch removed. Closed.

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.

- a. It is regrettable that usable informal recreation space has been reduced even further than previously submitted (see blue highlighted areas below, capturing amenity grass areas outside of SuDS). It is assumed that the attenuation basin has been enlarged to meet drainage requirements and to assimilate more naturally within the receiving landscape. However, amendments must be made to enhance and increase amenity greenspace in order to provide informal recreation pursuits such as 'kickabout' football, picnicking, kite flying and dog walking, as per the OSSR. Please consider relocating the treed footpath along the perimeter of this area and the picnic tables closer to the footpath in order to better allow for the informal activities listed above.



[LEFT] DC/22/1052 layout, [MIDDLE] current masterplan, [RIGHT] current masterplan rev. A

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

- b. The amendments to typology allocations are noted; while these continue not to accurately reflect descriptions, they are sufficient for the purposes of ensuring the OSSR requirements are met. Further, while increased seating provision continues to be recommended, the addition of a pergola and ornamental planting is welcomed. Closed.

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.

Amended, with thanks. Closed.

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

- a. Dog fouling bin in addition to bin proposed. Note that these should continue to be located outside the play area.
Combined litter and dog waste bin now proposed, however the description reflects the original bin. This can be secured via condition. Closed.
- b. 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.
It is regrettable that no further play opportunities have been provided, however it is noted that the nest swing is inclusive. Closed.
- c. Creatively designed and suitably located seating should be provided for children in order to encourage social play.
Not yet addressed. Please provide.

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?

Bow-top railing proposed, with thanks. Closed.

Additional Landscape Details – Action requested

- 37. Please amend trees lining the access road from the roundabout to reflect semi-mature.
Not yet addressed; to be secured via condition.
- 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.
Not yet addressed; to be secured via condition.
- 39. Timber equipment is preferred to have steel footings to prolong longevity and avoid rotting. Please amend.
Not yet addressed; to be secured via condition.
- 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.
Not yet addressed; to be secured via condition.
- 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.
Not yet addressed; to be secured via condition.
- 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.
Not yet addressed; to be secured via condition.
- 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.
Not yet addressed; to be secured via condition.
- 44. As above, alternative methods are requested for establishing meadow planting. Please review.
Not yet addressed; to be secured via condition.
- 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.

[Not yet addressed; to be secured via condition.](#)

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.

[Not yet addressed; to be secured via condition.](#)

47. Please add note to remove stakes and guards upon successful establishment or after 4 years of planting, whichever is sooner.

[Not yet addressed; to be secured via condition.](#)

Additional comments:

48. The footpath and associated planting bounding the LEAP fall within the adjusted attenuation basin (see purple highlight below). While it is understood that the proposed footpath would align with the level bench within the SuDS basin, this arrangement raises cause for concern in relation to the basin's function and accessibility. Confirmation should therefore be provided that the planting and footpath would not compromise the capacity of the drainage feature, and that the footpath route would remain accessible and compliant with relevant accessibility requirements. Notwithstanding, it is recommended that the footpath, LEAP and associated landscape proposals are adjusted to sit outside the attenuation basin area



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.

[As above.](#)

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	09/06/2026 16/09/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	11/06/2026 21/09/2026