



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Parcel at 519887 133300 Rusper Road Horsham West Sussex
DESCRIPTION:	Construction of Primary Road from the Left-In, Left-Out junction with the A264 (constructed pursuant to Outline Planning Permission DC/16/1677) to Bush Lane (Bridleway 1585), footpaths and cycleways, foul and surface water drainage including a SUDS basin and foul pumping station, landscaping, substations and associated infrastructure.
REFERENCE:	DC/25/1543
RE-CONSULT:	1 st set of comments in black 2 nd set of comments in blue
RECOMMENDATION:	Objection / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: 2nd set of comments While some amendments, including smoother gradients in various locations, are acknowledged and welcomed, these are not in itself sufficient to address the fundamental concern expressed in regard to the proposed relationship of development with the existing landscape features. We respectfully request the evidence to demonstrate the applicant's response dated 15th Jan 2026, under no 7 <i>'The alignment of the road, and therefore the footpath and banking, are determined by the existing completed Li-Lo junction. The road cannot be pulled further south or lowered (to reduce embankments) as its horizontal and vertical alignment along this initial section is fixed by the horizontal and vertical alignment the recently constructed section of road just outside the red line boundary. Altering the road alignment more severely <u>would lead to unacceptable impact on road safety</u>. The proposed design sees the foot/cycleway pulled closer to the road in this initial section to mitigate the impact on the existing watercourse and vegetation.</i> Until then, we continue to request that the road layout is moved south, away from the landscape features to prevent the encroachment of RPAs and importantly to prevent earthworks taking place within areas identified as being protected by fencing within the Tree Protection Plan.	

We also request that HDC's Arboriculturalist is re-consulted to review proposed earthworks in tandem with the TPP and AIA, as well as review the RPAs of the perimeter trees of the priority woodland and the woodland to the west of the scheme. We have flagged our concerns with the officer who confirmed that the levels plans was an oversight and his comments need to be address this point.

As it stands, the proposals are considered to conflict with HDPF policies 25, 26, 31 and 33 (6) as a result of mature landscape features not being protected, conserved and enhanced and therefore cannot be supported on landscape grounds.

In addition, please note that while some changes have been made to address some of our comments on the landscape plans and TPP, these have not been coordinated with other relevant plans. For example, there is a location where a retaining wall is now proposed to reduce the encroachment into RPA's but this is not updated and coordinated with the earthworks plans, should you be minded to approve the application without addressing our concerns.

1st set of comments

Concerned is raised with the changes between the parameter plan and the current proposals. These changes undermine the landscape strategy and importantly the existing green infrastructure, therefore they must be reviewed. The current scheme is not sensitive to its setting and does not assimilate naturally into the existing landscape.

The significant proposed earthworks additionally result in loss of vegetation and in encroachment of root protection areas (RPAs), which are not accurately reflected in plan. As such, existing, mature landscape features are not being protected, conserved and enhanced, contrary to HDPF policies 25, 26, 31 and 33 (6).

Please see detailed comments and recommendations below, which aim to support the delivery of a more balanced and landscape-sensitive design.

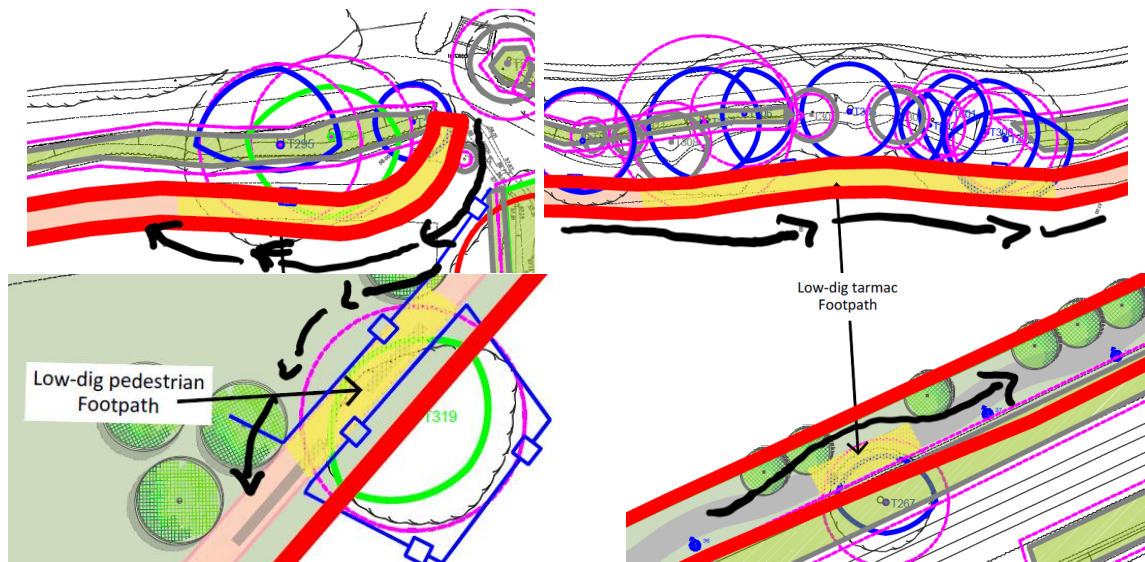
MAIN COMMENTS:

Layout & Levels

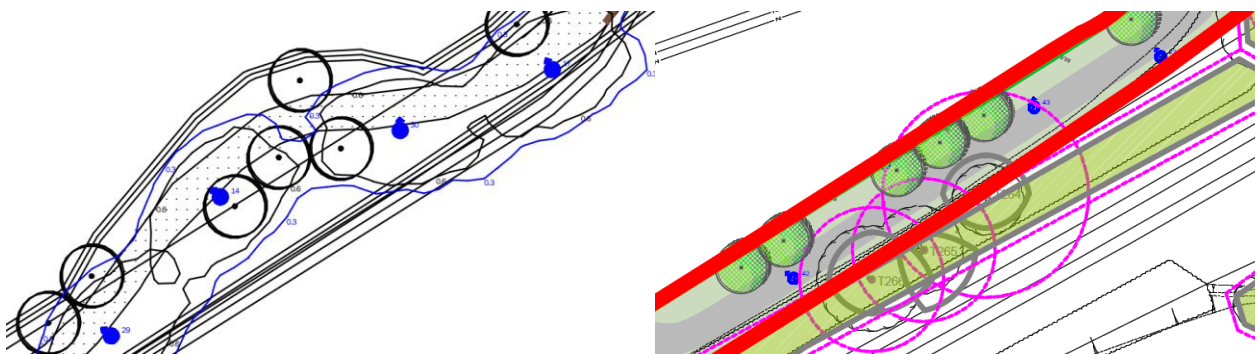
1. The proposed layout deviates from the previously approved parameter plan and results in major change to the green infrastructure, further resulting in the undermining of the mature hedge and treeline in the centre of the site, as well as the loss of a significant green corridor positive to the setting of these retained features. While the preference to bring the northern and southern parcels closer together is appreciated, it mustn't be at the cost to the existing well established landscape features and a middle ground must be found. We note response dated 15th January for points 1 and 3 and respectfully disagree that the proposed layout retains more of existing green infrastructure than the previously approved parameter plan, particularly given the uncertainty raised by the proposed earthworks and potential loss or deterioration of the existing vegetation. In any case, the central mature hedge and treeline have greater landscape value than the hedgerow referenced in the response and thus its retention and longevity is of key importance.
2. The retention of existing vegetation is cited as integral to the proposals, with aims of retaining and enhancing green ecological corridors within the site being highlighted within the 3.6 of the LEMP.
3. We request that the layout is revisited in order to better align with the approved parameter plan and conserve the connectivity and thus resilience of the central mature hedge and treeline as well as the existing field boundary which also aligns with the current positioning of the PRoW. The existing landscape features (hedgerow and ditch) will provide a mature

setting to the users of the footpath, and we are concerned as to the future relationship of the hedge with the development. Further, allowing the existing hedgerow to be placed within a green corridor, will strengthen its presence and understanding of the original landscape character and pattern. We note in addition that an over-delivery of 80 car parking spaces is proposed and thus there are opportunities to make space for proposals without negatively impacting the green infrastructure.

4. Given the undeveloped nature of the site, the RPAs must be entirely avoided in order to secure the retention and healthy conditions of key landscape features such as trees and hedgerows, as per the scheme's aims (see point 2). **Proposals must demonstrate compliance with BS 5837:2012 and as such, development within RPAs should only be observed where unavoidable. This fundamental principle of avoidance has not been demonstrated, and given the undeveloped nature of the site, we consider the layout can indeed be adjusted to fully avoid RPAs.**
5. As such, while the following examples adhere to minimum recommendations, the default position should be that development occurs outside of RPAs. We therefore request that footpaths and cycle paths are altered to avoid these areas. Please see examples below. **Not addressed**



6. As above, in the example below, the original layout as reflected in the lighting plans is preferred. In any case, we note that 'low-dig' has not been indicated within the Tree Protection Plan (TPP) and must be amended accordingly. **Not amended, although lighting plan is now adjusted to coordinate with the TPP.**



7. Partial clearance of category A mixed woodland group W281 is proposed under 5.15 of the AIA, however, it has not been included within the tree survey, nor labelled in plan. We

assume it is the area indicated below – if not please indicate the location of W281 in plan. [A2 category W281 added to the AIA and TPP, with thanks.](#)

Nevertheless, while the encroachment appears relatively minor, the deterioration of this existing vegetation would result in an eroding effect on the landscape character and as per points 2 and 4, its retention and healthy conditions should be secured from the outset. This arrangement is deemed an unnecessary undermining of green infrastructure and can be rectified by pulling the road, footpath and banking further south. [not addressed](#)



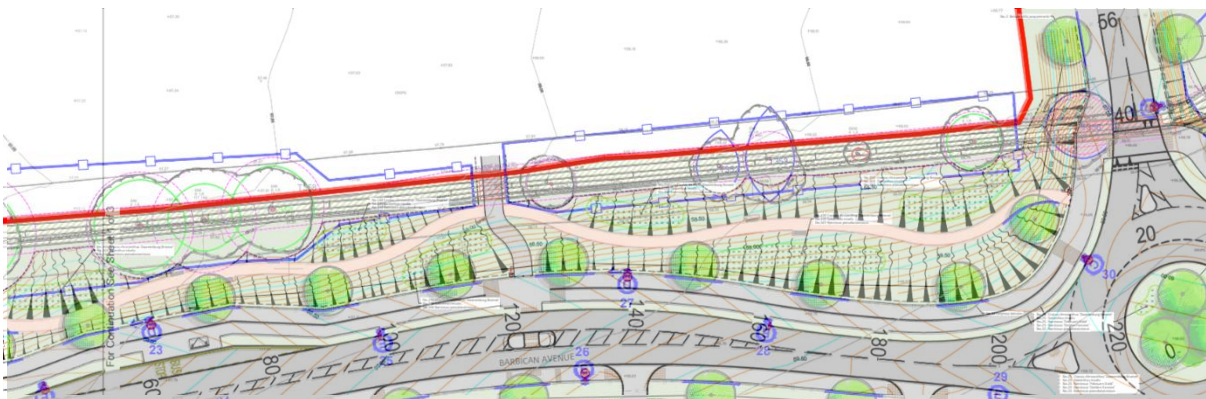
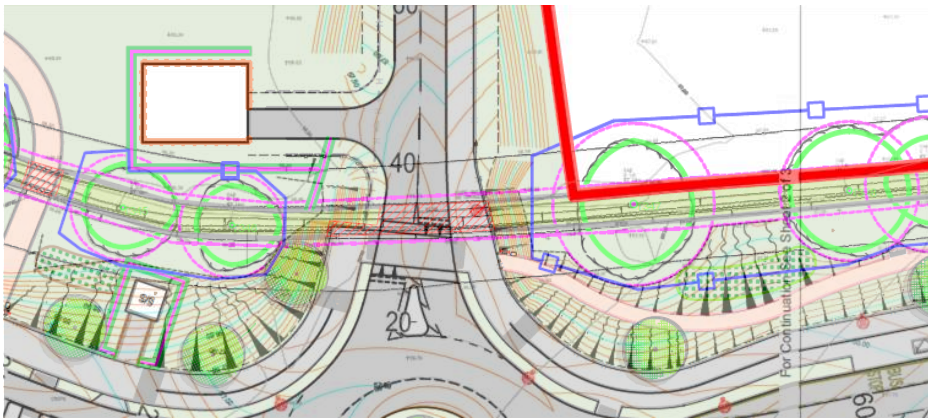
8. Further, the RPA of this woodland is not indicated within the TPP. Please update accordingly, noting that as per section 7.9 of the AIA, tree roots can be damaged by compaction and there should be no changes in ground levels within the identified rooting areas of retained trees.
9. RPAs and tree protection fencing are not indicated in the levels plans, and the proposed earthworks are not indicated within the TPP. It therefore appears that significantly more vegetation is likely to be lost or removed as result of the proposed levels and level of works around existing RPAs . We require both plans to be updated accordingly and that both the Arboriculturalist and BNG officer are re-consulted as a result. [While we acknowledge that there is no requirement for earthworks to be demonstrated on the TPP or vice versa, this request was made so that there was opportunity for both disciplines to observe the level of encroachment being proposed. Based on the existing plans, we reiterate that the proposals are not sympathetic towards the existing vegetation and that earthworks are taking place beyond the areas that have been indicated by the TPP as being within the protective fencing.](#)
10. For example, while the road layout below is subject to a separate reserved matters application, major concern is raised in regard to the significant earthworks proposed within priority habitat woodland, which is reflected as retained within the TPP. As per points 2 and 4, this landscape feature must be avoided and thus we recommend reducing or removing changes to the topography.



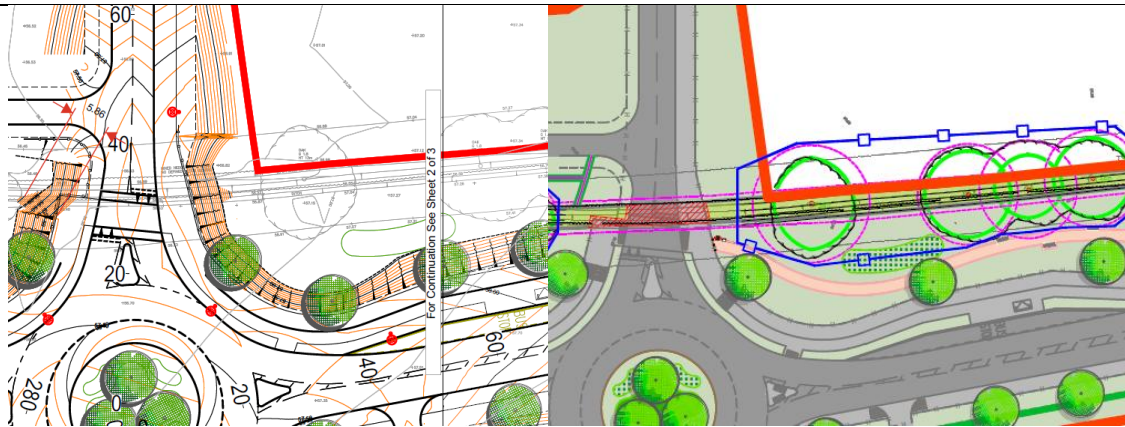
[Some amendments are noted within this area, which includes the proposals of a retaining wall, presumably to reduce the impacts on the RPAs. However it is noted that while this is revised within the TPP, the levels plan remains unchanged as shown on the merged extract below:](#)



And further examples of proposed earthworks within the tree protection fencing area. We reiterate point 4 in regard to pushing the substation and hedgerow slightly north.



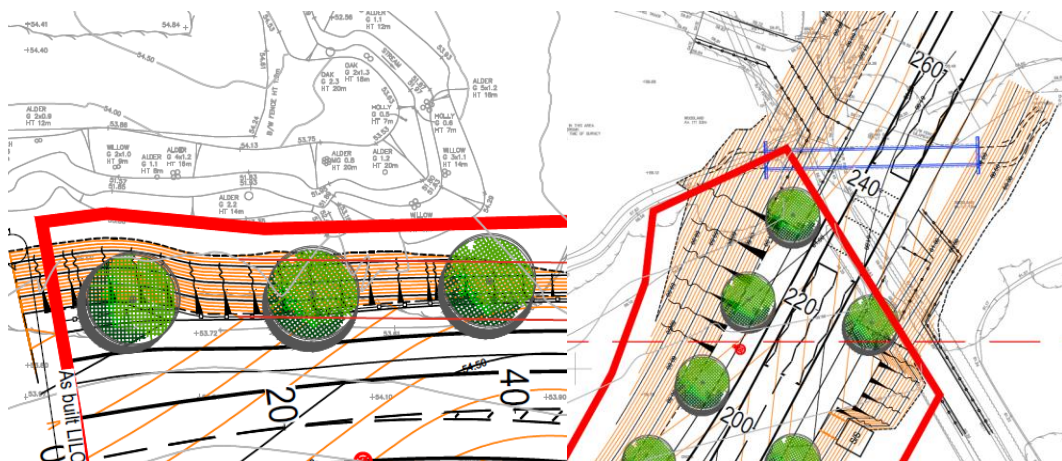
11. Levels are only reflected for the main road and appear to cut off in proximity to ancillary buildings, footpaths and secondary vehicle access routes. Please amend to reflect all proposed levels in order to ensure that the scheme is deliverable and that accessibility requirements are met. For example, how is the cycle route proposing to negotiate the proposed levels in the extracts below: [Earthworks proposals have been updated to reflect generally gentler slopes, with thanks. However, we note gradients of 1:2 remain and may require methods of soil stabilisation to be proposed.](#)



12. The sections provided only reflect the roads. The following sections are requested:
- Demonstrating the relationship between the road and the surrounding landscape
 - Connections between footpaths, cycle paths and the road, particularly the Diverted Public Right of Way (With Permissive Cycle Agreement)
 - The attenuation basin

Drainage

13. No drainage information has been submitted, however multiple drainage features are found within the red line boundary including the large attenuation basin and the 'selective tree removal for drainage trench agreed under Arboricultural Supervision within Mixed tree group G54 PA'. This information is requested. [Received - Closed](#)
14. The previously highlighted slopes conflicting with woodland to the west and to the east will direct polluted run-off into the woodland, Channells Brook watercourse, ditch and the existing pond. Thus, robust pollution protection measures must be in place to avoid impacts to the landscape features, watercourses and other controlled waters in the long-term. These measures need to be coordinated across both landscape and drainage strategies. [We note response dated 15th January which states that there is no direct polluted run-off into watercourses and woodland areas, however the submitted drainage information and proposed levels suggest otherwise. Nevertheless, we will refer this issue to other specialists better equipped to review this point. Closed.](#)



15. We note from the Landscape Statement under section 4.4 that the attenuation basin will be available as open space, however this is deemed unrealistic as the conditions are inappropriate for general amenity use. This is highlighted further by the proposed fence around the eastern perimeter. [Closed](#)

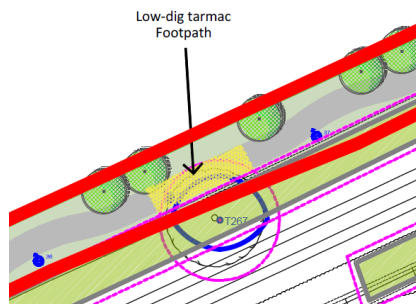
16. As per the 'Open Space, Sport & Recreation Review 2021 (OSSRR)', SuDS schemes will not be counted towards the amenity space quantity standard as these areas cannot be used for recreational purposes. [Closed](#)
17. The ground contouring, inlet and outlet design of all SuDS features should be carefully considered to maximise the amenity value. We recommend that headwalls are designed to appear more naturalistic in character, for example, by cladding in Horsham stone. Please provide details [Closed](#)

Soft & Hard Landscaping

18. We note within the AIA under section 5.18 that footpaths within RPAs will be porous to better allow tree roots to thrive. As such, we request the low-dig section below to reflect a porous material. [While tarmac is proposed, this must be porous as per the requirements of the AIA. Please specify porous tarmac within the plans](#)



19. As above, the section below should reflect a porous material. However, as per point 5, the default position is that it should avoid the RPA entirely. [As above](#)



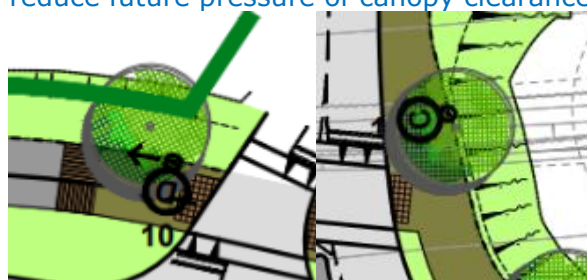
20. While *Crataegus monogyna* is welcomed within woodland mix and hedgerow, it is not deemed appropriate as a specimen tree. Please consider a lesser-used alternative within the planting palette or a species found in the adjacent woodland, as per the BNG officer's guidance. [We note response dated 15th January which states that *Crataegus monogyna* has been replaced by Turkish hazel, however this is not reflected in the proposals. Notwithstanding, we note the response from HDC's Ecologist in regard to native species and deem this point minor, thus closed.](#)
21. We recommend adding a 5th woody species to the proposed hedgerow in order to make it species rich and thus more resilient. [Closed](#)
22. As highlighted within the OSSR, attenuation basins should blend aesthetically into the surroundings and be planted and combined with variations in vegetation structure to ensure habitat diversity and landscape effect. We therefore recommend a greater diversity and provision to reflect nectar rich plants, various grasses and variations in vegetation structure. Please amend the planting proposals accordingly. [We note response dated 15th January which states that planting will sacrifice drainage capacity. We respectfully request justification for this statement given that it is widely accepted that planting contributes to drainage and is thus a landscape led SuDS strategy which contributes to 3 of the 4 pillars: Water Quality, Amenity and Biodiversity.](#)
23. Despite being illustrated within planting proposals, the marginal/aquatic planting is not listed within the schedule. We note from the Landscape Statement under section 4.4,

however, that the basin is designed to be dry much of the time, therefore as above, these species should be reviewed and added to the schedule as necessary. While *Caltha palustris* and *Mentha aquatica* are welcomed, they are located in areas that are intended to be dry. These species require permanent levels of water and thus should be located within the low channel and/or replaced with alternative flowering species.

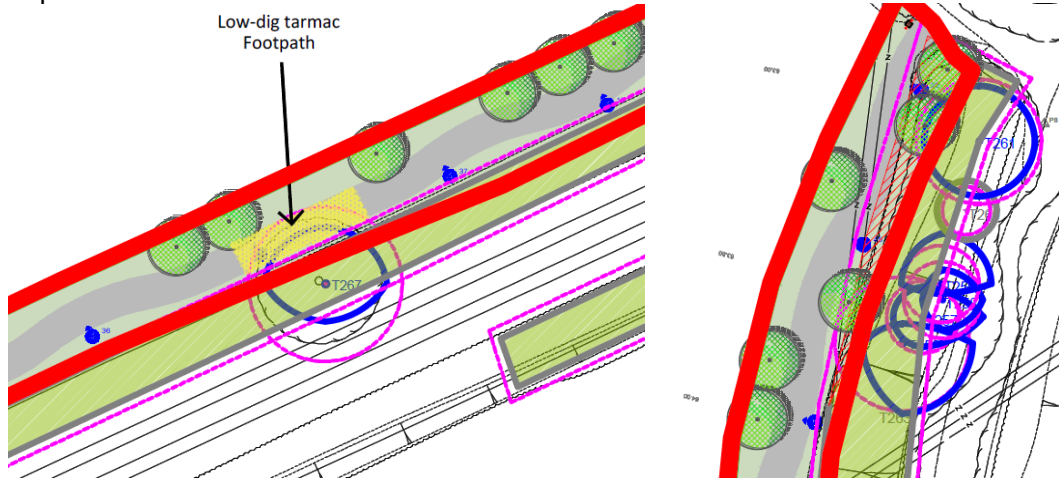
24. As above, given the expected dry conditions, we recommend species like *Mentha aquatica* are only to be planted in reliably damp locations. As above
25. We echo comments made by the BNG officer in regard to avoiding planting within existing RPAs. As such, while swathes of bulb planting is welcomed, these should be relocated outside RPAs to avoid unnecessary disturbance and competition with existing roots. Not addressed.
26. HDC requires any timber equipment to be installed with steel footings to prolong their longevity and avoid rotting. Please update the furniture specification as necessary. We note response dated 15th January which states that there is no policy basis for this request. We note that this is a common request in Horsham due to clay soils and that design choices that consider choices that consider the lifetime of a development should not require policy backing, however HDPF Policy 33 (5) requires the use of: *high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate.*

Lighting

27. Woodland and hedgerows, which are key characteristics of the local landscape, can be deteriorated due to increasing levels of light pollution, therefore light spill must be considered sensitively so as not to cause potential adverse effects. The current lighting layout plan only indicates the southern cycle path. Please amend to reflect all lighting within the red line boundary. Street lighting layout plans received, with thanks. However, lux levels have not been indicated, thus light spill cannot be assessed. Please provide a lux levels plan for the entire red line boundary as opposed to just the southern cycle path.
28. Kirium 200 Bollards are indicated within the lighting layout plan, however Kirium 160 Bollards are indicated in the lighting document. Regardless, the lighting layout has considered 1725 lumens, which reflects neither product. Please confirm that Kirium 160 Bollards are the proposed, specifying the 2700K model so as to minimise adverse effects on surrounding existing vegetation. The lighting sheet (2898-5-5-FRN) now indicates Kirium 200 Bollards are to be used, but the lighting plan for the cycle path continues to indicate lower levels – 1,725lm as opposed to 2,100lm – and thus, the effects of light spill cannot be accurately assessed which may result in an excess of bollards. Further, the temperature of 2700k is continued to be requested and indicated in plans.
29. Uplighters and columns are also indicated in the lighting document, but no locations or associated lux levels are indicated in plan. Please amend accordingly. Uplighters and columns have been removed, despite columns now being indicated in plan. We note that columns of both 6m and 8m in height are proposed in proximity to proposed trees (see below examples, noting that these are not exhaustive). These columns must be relocated to ensure an appropriate distance between future tree canopies (typically, 1.6m). This is essential in order to reduce future pressure of canopy clearance or removal.



30. Please confirm if no lighting is proposed for the footpaths and cycle paths north of the main road. We note response dated 15th January which states that no lighting is proposed in this area. Closed, with thanks.
31. As per points 2 and 4, we recommend that utilities avoid RPAs where possible. As such, please consider slightly altering the locations of bollards and associated utility runs – see examples below. Not addressed



Specification, Establishment, Management & Maintenance

32. Please include tree pit details for sloping ground as many trees are proposed on slopes or embankments. Received, with thanks. We note specification that slopes should be no steeper than 1:3, however we note instances of 1:2 slopes. We recommend that naturalistic soil stabilisation methods are incorporated within the tree pit details if the gradients are not altered.
33. We note the following in section 5.16 of the AIA: *T270 (Goat Willow) is recommended to be re-coppiced just above ground level in order to clear the new footpath from which point it can be allowed to regrow and managed in a reduced form.* Please include this information within the Landscape Specification as well as the LEMP in regard to future maintenance. This has not been specified within the Landscape Specification, however this point is deemed minor, therefore closed
34. Proposals must align with the requirements of the OSSR in order to comply with HDPF Policy 43. As such plants should be sourced from seed or stock from the Region of Provenance 40 in order to ensure resilience and therefore successful establishment. Where this is not possible, given the sensitive location in proximity to priority woodland and irreplaceable ancient woodland to the north, planting stock must be locally sourced from suppliers of accredited UK Sourced and Grown stock, in accordance with Woodland Trust guidance. Supplier information must be made available upon request. We note the relevant aims and objectives within the LEMP under 3.6.f and 4.1.d, however this should be amended to include all proposed planting, as opposed to solely replacement planting. Change from 'any' to 'all' is noted, however the LEMP does not specify Provenance 40 or accredited UK Sourced and Grown stock. While it is recommended that this is amended prior to approval, we note that supplier information will be made available upon request and we are satisfied that this can be enforced at a later date. Closed.
35. We echo comments made by the BNG officer in regard to biocides and fertiliser, and 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 the abutting woodland and waterways. We note mention of alternative methods for weeding, however there is lack of clarity as well as a reliance on herbicides throughout the LEMP and Landscape Specification. Please refer to pan-uk.org for guidance and [resources](#), noting that herbicides including glyphosate must only be used on Schedule 9 species. Please amend the following sections accordingly to clarify:

- a. Landscape Specification: 168.3, 421.1, 210, 212.2 (unless pernicious weeds are clarified), 300.3
- b. LEMP: 5.115, 6.4.g, 6.4.j, 7.7.e, Section 9

As per our previous comments, we do not agree that HDC has been inconsistent in its approach. The wording cited was intended to recommend that herbicides should not be used. However, the specification continues to propose herbicide use as an alternative to hand weeding, which does not address the original concern and recommendation.

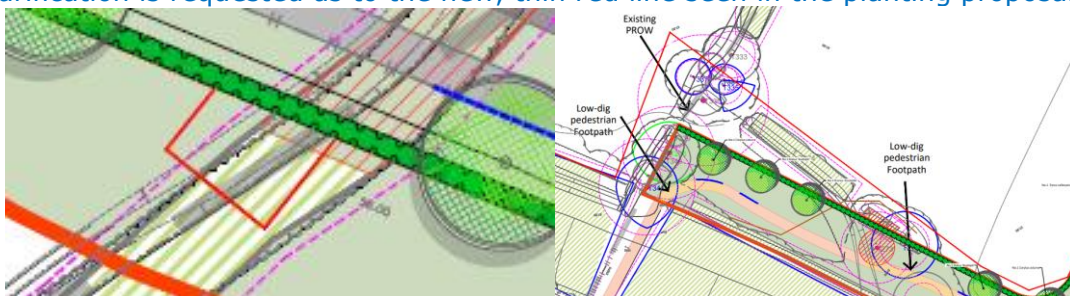
Regarding the comments that this request is not supported by policy, the recommendation aligns with the Council's climate resilience and carbon reduction objectives, as well as the Greenspaces Strategy 2024-2030. A review conducted by the Parks and Countryside team on use of pesticides and herbicides within the District's public spaces concluded that herbicide use, at this stage, should be restricted to specific circumstances, namely, treatment of invasive species listed under Schedule 9 of the Wildlife and Countryside Act, stump treatment, and limited annual application on selected hard surfaces (e.g. cemeteries and selected paths in car parks). These findings are to be reviewed every two years with the intention of further reducing or ultimately ceasing chemical use.

Therefore, we continue to recommend herbicide use across the site be reviewed and limited to a 'last resort' option only. Please amend.

36. We note that bark mulch is proposed around stems to retain soil moisture, however we recommend that a 120mm collar should be left free of mulch to prevent the stems/trunks from rotting. Please amend the Landscape Establishment Note, LEMP and Landscape Specification accordingly. [Closed](#)
37. Any stakes, ties and guards should be removed upon successful establishment or after 4 years of planting, whichever is sooner. Please update the LEMP accordingly. [The clarification of removal after 4 years of planting is to ensure that paraphernalia is not left in situ, compromising the long-term health of trees and impeding their establishment. Please amend.](#)
38. Please include details of management responsibilities. [Closed](#)

Further comments

39. We note that a total of 31 trees have been removed from the proposals, significantly reducing the tree lined corridor. Justification is requested for their removal and we request their reinstatement ensuring no conflicts with lighting columns.
40. Clarification is requested as to the new, thin red line seen in the planting proposals.



41. We note inconsistencies with the General Arrangement (GA) plans and Planting Proposals. Please ensure that these are coordinated. Further, the GA does not detail the updated red line boundary.

RECOMMENDED CONDITIONS: N/A

NAME:

Elly Hazael

	Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	17/11/2025 12/02/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	19/11/2025 13/02/2026