



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Thakeham Tiles Ltd Rock Road Storrington West Sussex
DESCRIPTION:	Outline application for the demolition of existing buildings, and the re-development of the site for up to 108no. dwellings (including a mix of private and affordable housing units), with associated infrastructure including vehicular, cycle and pedestrian access, parking, landscaping, open space and play provision, and sustainable drainage with all matters reserved except access.
REFERENCE:	DC/25/2087
RECOMMENDATION:	Holding Objection / More Information / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: While the principle of development on this site is not opposed from a landscape point of view, there are multiple concerns that will need to be addressed to be satisfied that 108 dwellings can be accommodated without having an adverse effect on the landscape character and visual amenity of the area. Importantly, subject to the wholly exceptional circumstances for the loss of priority habitat being met, the understanding of the proposed site levels and their relationship with the remaining existing green infrastructure, the delivery of suitable open space provision and overall coordination of landscape strategy and drainage strategy needs to be addressed. As it stands, the proposals are considered to conflict with HDPF policies 25, 31 and 33 (1, 3, 4 and 6) as result of mature landscape features not being protected, conserved and enhanced. Further, the illustrative scheme does not demonstrate that there are opportunities to mitigate or enhance the loss of green infrastructure including for example the limited opportunities for tree lined streets or for a meaningful green corridor to the PRow.	
MAIN COMMENTS: <u>Site Description and Context</u> 1. The site is located in the Parish of Thakeham, but within the build-up area boundary of Storrington and Sullington. It sits south of Rock Road and east of Storrington. To the east is the area known as Heath Common, characterised by highly distinctive semi-rural sylvan character and appearance.	

2. The site itself remains in active operation as an industrial centre for the manufacturing, storage and distribution of concrete products and its strong industrial character is evident. It's surrounded by development to the west, south and east, while to the north sits Roack Road and countryside beyond.
3. The site boundaries are predominantly heavily wooded with understorey planting, with the exception of a middle portion of its northern boundary where the existing access, car park and storage of materials is open and defined by a section of brick wall. The peripheral trees are deciduous, and an area of 'self-seeded' pines occupies the southern portion of the site and is protected by a tree preservation order (TPO). Also protected by a TPO the woodland block within the north-eastern part of the site.
4. Deciduous woodland can also be found directly northeast and south of the site. These heavily wooded boundaries, provide a level of visual containment and screen the site and works from the adjoining settlements.
5. The existing site access is from Rock Road, which predominantly exhibits a heavily vegetated and wooded character, particularly between the junction with Multon's Lane and Storrington Rd/ Thakeham Rd roundabout.
6. Public right of way (PRoW) 2625 runs through the site, sunken and shielded from most of the works by walls, and connecting Hillside Walk and Bracken Lane.
7. The site lies approximately 950m to the north and east of the boundary of the South Downs National Park, but no direct impacts on the special qualities of the National Park are expected as result of the development. This is mostly due to the topography of the site and layers of intervening vegetation.
8. The site is allocated in the Thakeham Neighbourhood Plan under Policy 2, Thakeham Tiles , albeit of a smaller area, and benefited from a previous outline permission granted in 2020 for the erection of 90 dwellings. This permission has now lapsed but the principle of the development of the site for residential purposes remains.

Landscape Character Guidance

9. The southern parcel of the site was once outside of the settlement boundary and has been identified within Landscape Character Area (LCA) E1 Parham and Storrington wooded farmlands and heaths as defined by the Horsham District Landscape Character Assessment (2003). Key characteristics reflected within the site and its context include rolling landform of sandy ridges cut by small narrow stream valleys and extensive pine and oak-birch woodland.
10. The character area is identified as *a distinctive landscape of rolling sandy ridges and stream valleys with a complex mosaic of oak- birch/woodland, conifer plantations, heathland and rough pasture. The varied landform reflects the underlying complex geology in which Folkestone Sands and Lower Greensand Beds are dominant. It is a generally well enclosed landscape due to the extent of surrounding woodland. Despite the proximity of the urban edge of Storrington and the intrusion of traffic, the area retains surprisingly rural qualities.*
11. Heath Common to the east, is described within the Heath Common Design Statement 2018 as, *low density characterful, generally secluded, detached houses with large open-wooded and relatively natural gardens which respect the wooded and heathland landscape and biodiversity. The pattern of development in the area is an informal one and spacious in character, the degree of space between individual properties and their boundaries is noticeable. Whilst the buildings in the area are of varied designs, for the most part they are of a traditional vernacular.*
12. While this document is primarily guidance to the lanes area within the Parish of Washington, it remains important to any development within its setting, such as the development site, in

informing the context and character of the surroundings, as well as to have regard to indirect impacts of development upon this area.

13. The Thakeham Parish Neighbourhood Plan (adopted 2017), states:

“The vision for Thakeham is to protect, maintain, enhance and improve our distinctive environment and community, to provide an outstanding quality of life for current and future generations of residents, to be socially and economically thriving and to conserve and protect our high quality natural environment, landscape, habitats and wildlife biodiversity. Future development during the plan period should maintain the character of the Parish through the adoption of appropriate building styles, low densities and open green spaces in order to mitigate its impact.”

Landscape and Visual Appraisal

14. The conclusions and rankings submitted within the LVA, particularly paras 6.10, 6.11, 6.12, 6.13 (but not limited to) for landscape character are disputed. These will be discussed in more detail below through the various shortcomings identified, including the amount and type of woodland proposed to be removed which includes Priority Habitat, loss of green infrastructure, the lack of suitable mitigation or in demonstrating that what is to be retained can be suitably secured without putting at risk its long-term retention.

15. In addition, although we agree with the mitigation measures and opportunities measures identified within the appraisal (copied below for ease), these have not been embedded within the illustrative layout and therefore the adverse effects would remain as identified at Year 1:

- *Proposed tree planting suitable for the street scenes to soften the built form as viewed from the elevated scarps of the Downs;*
- *The protection of existing woodlands, tree lines and scrub vegetation to maintain and enhance on site biodiversity, to maintain the existing rural character of the locality, especially outside the built-up area boundaries*
- *Extensive tree planting within the street scenes and open spaces to mitigate for any loss of woodland;*
- *Carefully designed structures and infrastructure to adapt to the existing rising ground of the site, well considered materials for retaining structures and well thought out orientation of houses and streets to suitably direct or screen views in, out and across the Site;*
- *Enhance the setting of Public Rights of Way across and immediately outside the Site through careful design, softened edges and more open views into the Site replacing the strong boundaries and sunken nature;*
- *Well structured planting within streetscapes and Open Spaces and enhanced transition from woodland to built environment, imitating woodland edge;*
- *Enhance sense of place and provide reference to the Site’s heritage within the site layout and external design, including the former sand quarry and the small railway line originating from between World War I and II.*
- *Limiting the cumulative effects of the allocated Site to the north through retaining a vegetated buffer along the northern Site boundary to limit intervisibility and enhance separation between the built-up areas and maintain the historic landscape patterns and fieldscape boundaries;*
- *Enhancing the site character through the redevelopment of the brownfield site, providing infill development between Storrington and Heath Common, containing most of the development proposals within built-up area boundaries.*

Character and green infrastructure

16. The carving of existing woodland to the extent proposed highly undermines the existing green infrastructure, without a clear strategy to mitigate for this loss within the indicative layout and therefore resulting in an adverse effect on the heavily wooded character of the area.
17. Along the western boundary, the connectivity of the green infrastructure is lost as result of proposed development parcels and serious concerns are raised if the retention of the fragmented section proposed is viable when interrogated alongside the site levels.
18. Overall, there is a lack of information providing certainty that what remains to be retained of the green infrastructure is suitably protected and designed to create a sympathetic relationship with the proposed development, this is discussed in more detail below in tandem with levels.



Levels and Existing Vegetation:

19. An indicative levels plan is needed to provide a broad understanding of the proposed topography changes so that there is an understanding on the impact these will have on the retained wooded areas and its longevity.
20. Notwithstanding the outline nature of the proposals, section BB (see extract below) raises concern with the proposed relationship of the play area located on an elevated position and the proposed plots 83, 73 and 74. In addition, the public right of way treatment is limited to an ordinary footpath with no integration or continuity to the more suburban experience along Hillside walk, or enhancement based on the key landscape character guidance. This is also contrary to the findings of the LVA and mitigation measures proposed which states: *'Enhance the setting of Public Rights of Way across and immediately outside the Site through careful design, softened edges and more open views into the Site replacing the strong boundaries and sunken nature;*' further the landscape strategy states: *'The existing Public Rights of Way access crossing the site would be maintained, with enhanced visual and physical connectivity towards the Site.'* I don't consider the proposed relationship to be soft and successful in providing an enhanced experience for users of the PROW also taking into account the

proposed loss of woodland and the need for compensation measures which should be primarily directed to the amenity spaces within the layout.



21. The information submitted is insufficient to understand the impact of the earthworks on the RPA's of the existing retained trees, especially with regards the southern parcel as these have been identified as a group, W1B. From our site visit it is clear that a large amount of earthworks will be required to prepare this area to receive the development plots and I am not satisfied the extent of existing woodland to be retained as shown can be safeguarded alongside the necessary works to facilitate the development, noting that this is key to the integration of the proposals into the character of the area. This plan is very vague in that all the trees surrounding this parcel are indicative and not surveyed, and the encroachment into the RPA's as result of the works is unknown.



22. Based on the constraints and opportunities plan, and site visit observations, I have serious concerns with the excavation and removal of vegetation required for the areas highlighted in yellow, to facilitate the delivery of plots marked in red below. In addition, this area (and others within the layout) also coincides with the area denoted as Priority Habitat Deciduous Woodland and protected by an area TPO. This is an important landscape feature highly representative of the wooded character of the area and its loss will have a negative adverse effect to the character of the area. Further, if the wholly exceptional circumstances for the loss of this habitat are met I am not convinced that there is mitigation embed within the layout

to compensate for this loss, even though this is also a mitigation measure sought by the LVA *Proposed tree planting suitable for the street scenes to soften the built form as viewed from the elevated scarps of the Downs; and ' Extensive tree planting within the street scenes and open spaces to mitigate for any loss of woodland; '*



23. Concern is also raised with the positioning of the existing trees within the back gardens and their relationship with the proposed development whereby the trees will be subject to post development pressure for heavily reduction or felling by future residents. In particular the arrangement proposed for plots 99, 100, 101, 102, 104 and 105 and SuDS. The thinning of this boundary vegetation will have a negative impact on the character of Rock road.



24. I would also like clarification on the proposed relationship and the viability of retaining the clump of trees highlighted with the proposed properties to the west, given the variation in ground levels.



25. Further, within this section of the proposals, there is no mitigation planting between existing development and new development and reliance on existing or proposed vegetation within private gardens which will be difficult to control through planning. The landscape strategy states: 'The main built-up area of the Site is proposed to be slightly set back from the site boundaries to provide buffer and separation between the proposed and existing residential areas.' This is clearly not the case along this section of the scheme.
26. Overall, the indicative layout does not demonstrate that the proposals would conserve or enhance the landscape character or that the development of 108 dwellings can be accommodated within the site without significant changes. Even though the permission is applied in outline, given the challenging topography of the site and significant tree cover proposed for removal, it is crucial that an understanding of the proposed level strategy is submitted to demonstrate that the proposed earthworks will not have a negative impact on the retained landscape features.

Open space requirements & Drainage Strategy

27. I have copied an extract of the open space calculations based on the OSSR, for 108 dwellings. These reflect those shown within the landscape strategy but provide a further split to the multi-functional green space subcategories:

	occupancy assumption	number of units	calculated occupancy of scheme	Open space required per person:			Multi-functional greenspace proposed / potential split:			Children and young people proposed / potential split:	
				Allotments 1.8m ² per person	Multi-functional greenspace 43.9m ² per person	Children and young people 0.9m ² per person	Parks and Gardens 13.8m ² per person	Amenity Greenspace 5.8m ² per person	Natural and Semi-Natural 24.3m ² per person	Children 0.5m ² per person	Youth areas and facilities 0.4m ² per person
unknown	2.4	108	259.2	1.8	43.9	0.9	13.8	5.8	24.3	0.5	0.4
1 bed flats	1.2	0	0	466.56	11378.88	233.28	3576.96	1503.36	6298.56	129.6	103.68
2 bed flats	1.3	0	0	0	0	0	0	0	0	0	0
2 bed houses	1.7	0	0	0	0	0	0	0	0	0	0
3 bed flats	1.7	0	0	0	0	0	0	0	0	0	0
3 bed houses	2.2	0	0	0	0	0	0	0	0	0	0
4+ flats	2.4	0	0	0	0	0	0	0	0	0	0
4 bed houses	2.7	0	0	0	0	0	0	0	0	0	0
5+ bed houses	3	0	0	0	0	0	0	0	0	0	0
Area required for each typology (m ²)				466.56	11378.88	233.28	3576.96	1503.36	6298.56	129.6	103.68
Area required for each typology (hectares)				0.046656	1.137888	0.023328	0.357696	0.150336	0.629856	0.01296	0.01037
Off- Site Contribution Equivalent (£/m ²) *				10	25	170					
TOTAL OPEN SPACE REQUIREMENT - SQUARE METRES				12078.72			TOTAL OPEN REQUIREMENT - HECTARES			1.207872	

28. The layout indicates provision of a LEAP (0.04ha) within the centre of the site and an adjacent area shown as a space for picnicking, which would ordinarily fall under the amenity greenspace typology. This is in line with the lapsed permission however to be satisfied this is deliverable we request the following clarifications:
29. The drainage strategy includes a storage tank being located underneath the LEAP. The installation of play equipment will include some deep underground footings, and I was under the impression that these should not be positioned underneath a play area. Please can the applicant provide information to demonstrate these two uses can coexist and please also seek advice and acceptability from the LLFA on this point. Please note that if this is not acceptable, one of the strategies as proposed cannot be delivered.
30. Given this central space is the only practical amenity space within the site, we seek demonstration through indicative levels and cross sections, that the area identified as picnic/amenity area can be achieved and delivered with suitable ground contours that don't render the area unusable. Further the area must deliver the required 0.15ha generated on site and have a *minimum dimension in length or breadth of 20m* (OSSR 8.2.2a).
31. Even though the landscape design strategy document suggests that '*The proposed development would have a series of Open Spaces which would be designed in accordance with the Open Space Guidelines by Horsham District Council*', it is clear that any other on site provision could only fall into the Natural and Semi-natural greenspace typology. Storrington appears to have a deficit on this subcategory (OSSR 2021) and therefore provided the children and amenity open space is secured (subject to the clarifications above), the overprovision of this category over other types of multifunctional greenspace requirement generated by the development is considered acceptable.

ANY RECOMMENDED CONDITIONS: N/A

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DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	13/02/2026