



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Cemex Small Dole Landfill Henfield Road Small Dole BN5 9XJ
DESCRIPTION:	Proposed importation of inert restoration materials and reprofiling to provide an attenuation layer to mitigate the impact of climate change by improving long term sustainable management of leachate, temporary diversion of FP2774 and nature conservation, biodiversity and landscape improvements.
REFERENCE:	NC/26/0002
RECOMMENDATION:	Holding objection / Advice / Modification
SUMMARY OF COMMENTS & RECOMMENDATION: It is our judgement that the method proposed is over engineered and results in an excessive quantity of material and thus imposing form. Alternative measures must be explored in order to ensure the development assimilates naturally within the landscape. Further, the generated HGV movements and operational activity for a substantial amount of time will lead to a significant increase in the overall level of activity to the countryside location. This, along with incurred pollution, will diminish the tranquillity, sense of place and rural qualities currently experienced within the area. The proposed mitigation is insufficient in reducing adverse effects on the receiving landscape and visual context and we consider that there is opportunity to deliver a landscape led scheme that delivers on the objectives of the proposals with significantly less adverse effects. Please see advice below.	
MAIN COMMENTS: 1. Please note that we are unable to provide detailed site analysis or an LVIA assessment/rebuttal at this stage. 2. We note, however, that appendix 8.3 (viewpoint photographs) do not appear to have been provided. 3. In any case, it is regrettable that alternative, less intensive measures haven't been explored. We strongly recommend that phytoremediation is considered in full, either as a complete alternative to capping or as an additional measure so as to reduce the proposed HGV movements, length of operational activity and incurred pollution. Phytoremediation is	

highly likely to be successful in this location and a more efficient and effective method of remediation than currently proposed.

4. Further, a sensitively designed phytoremediation scheme would give rise to additional beneficial ecological, landscape and visual effects and thus would be more successful at mitigation.
5. We also strongly recommend that herbicides, including glyphosate, are not to be applied at any time due to impacts on existing and proposed ecological features, and particularly given the proximity of the Adur. Alternative methods for weeding should be considered such as hot foam systems, hot water systems, or electronic control systems. Please refer to pan-uk.org for guidance and [resources](#). The documentation should be amended accordingly to remove mention of herbicides and reflect alternative methods as above or hand weeding alone by careful digging or selective scything.
6. Three blocks of Willow and Alder woodland planting are welcomed, however we consider there to be scope for this to extend alongside the entire length of the Adur within the red line boundary. This is in order to provide ecological connectivity, further remediation, and to mitigate visual effects, softening the appearance of development from the PRoW network.
7. Furthermore, to increase mitigation benefits, this planting should be implemented as advance planting, to also reduce some adverse effects during the construction period.
8. Planting of *Populus nigra* var *betulifolia* is welcomed in particular, and we recommend its proportion is increased within the wet woodland mix.

RECOMMENDED CONDITIONS:

If you're minded to recommend the application for approval without the concerns addressed above the following details must be secured by condition:

Advanced Planting

Pre-Commencement (Slab Level) Condition: No development above slab level of any part of the development hereby permitted shall take place until areas of structural and mitigation vegetation suitable for advance planting are identified, submitted to and approved in writing by the Local Planning Authority. These are likely to include wet woodland planting along the full length of the Adur within the red line boundary. Confirmation of the delivery of these landscape works shall be submitted to and approved, in writing, by the Local Planning Authority.

Reason: To ensure identified adverse visual effects are satisfactorily mitigated, including during construction, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Landscape Management and Maintenance Plan

Pre-Occupation Condition: No part of the development hereby permitted shall be occupied until a Landscape Management and Maintenance Plan (LMMP) has been submitted to and approved in writing by the Local Planning Authority. The details should apply to all landscape areas and shall include:

- Long term design objectives
- Management responsibilities
- A description of landscape components
- Management prescriptions
- Maintenance schedules
- Accompanying plan delineating areas of responsibility

The landscape areas shall thereafter be managed and maintained in accordance with the approved details unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development and in the interests of visual amenity and nature conservation in accordance with Policy 33 of the Horsham District Planning Framework (2015).

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	12/03/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	13/03/2026