



Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

11/08/2023

For the attention of: Nicola Pettifer

Ref: DC/23/0406: Land Parcel at 512270 115959 Park Lane Ashington

Thank you for consulting us on the planning application the demolition of existing buildings and erection of 180 dwellings, sports pavilion, sport pitches and allotments; with associated access, landscaping, open space and infrastructure.

Summary

Not supportive on landscape grounds	
Supportive subject to attached recommendations and / or conditions	X
Further information required prior to determination	
No landscape comments / does not wish to comment	

We deem the proposals are acceptable in principle given the policy context of the site. That said, we advise that the recommendations set out in this consultation response are taken into consideration. If minded for approval, soft landscape, hard landscape and management plan conditions should also be considered.

Site Context

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

From a landscape perspective, we have reviewed the following documents:

- Tree Protection Plan (Dwg no. 1780-KC-XX-YTREE-TPP01RevB)
- Perspective View 01 (Dwg no. 062009-BEL-SL-PER01)
- Perspective View 02 (Dwg no. 062009-BEL-SL-PER02)
- Perspective View 03 (Dwg no. 062009-BEL-SL-PER03)
- Tree Survey and Impact Assessment (Dated: January 2023)
- Tree Constraints Plan (Dwg no. 1780-KC-XX-YTREE-TCP01Rev0)
- Planning Statement (Dated: February 2023)
- Supporting Planning Layout (Dwg no. 062009-BEL-SL-02)
- Landscape and Visual Impact Assessment (Ref: 3033-APA-ZZ-00-RE-L-0002 Rev. P03)
- Flood Risk Assessment (Ref: 2108611-01)
- Landscape Masterplan (Dwg no. 3033-APA-ZZ-00-LA-L-1000 Rev.P00.04)
- Ecological Appraisal (Dated: February 2023)
- Design and Access Statement (Ref: 062009-BEL-SL-DAS)

Site Context

The application Site is located to the west of Ashington village and comprises three arable fields separated by hedgerows, which connect Furze field Copse (priority habitat – deciduous woodland) to a woodland to the north of the Site. Ashington CofE First School is located to the east of the Site and the wider arable landscape is to the west. The A24 major transport route is located to the east of Ashington.

Planning Context

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in July 2021. The NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing “valued landscapes” and sites of biodiversity or geological value / soils. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Horsham District Planning Framework

The Development Plan consists of the Horsham District Planning Framework (HDPF), adopted in 2015 (HDPF) the Ashington Neighbourhood Plan (2019-2031).

The Site itself is located outside the defined built-up area boundary and therefore designated as countryside. Policy 26: ‘Countryside Protection’ of the Horsham District Planning Framework (HDPF) (2015) sets out a presumption against development unless for agriculture, forestry minerals, recreation or ensures the sustainable development of rural areas. It also goes on to say that any development permitted must be of a scale appropriate to its countryside character location and must not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.

Policy 25: ‘The Natural Environment and Landscape Character’ also sets out that proposals will be required to protect, conserve, and enhance the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.

The proposals should also have regard to Policy 31: ‘Green Infrastructure and Biodiversity’ which requires development to contribute to the enhancement of existing biodiversity and should be compliant with Policy 33: ‘Development Principles’ which states that proposals should be distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations of the relevant Design Statements and Character Assessments.

Ashington Neighbourhood Plan (ANP) (2019-2031) Referendum Version (March 2021)

‘Land West of Ashington School’ (ASH11) is allocated in the ANP to deliver approximately 150 dwellings (Figure 1) with associated open space but is with the provisor that no encroachment on the existed wooded areas is acceptable.

Other opportunities for development outlined include:

- Improved community facilities (Policy ASH8)
- Allotments and publicly accessible green open space
- Forest-School space for the school in the south-west
- Retained footpath access

- Vehicular access (shared with ASH12 – Church Farm House) must protect the setting of the Church and Church Farm House (listed buildings)
- Water diversion northwards

Whilst the HDPF (2015) identifies the site as outside of the built-up area boundary (BUAB) and therefore subject to Policy 26 'Countryside Protection', the ANP proposes a review of the BUAB at Policy ASH1 to accommodate all housing within the Site.

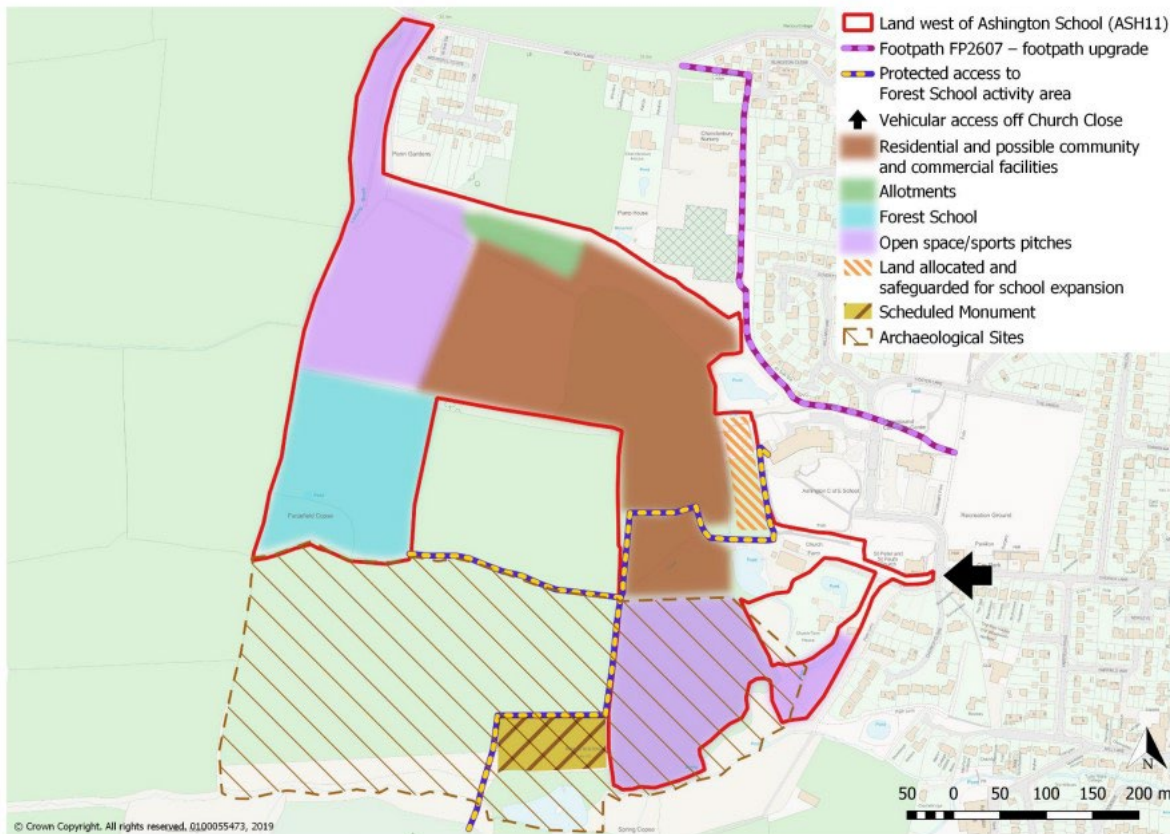


Figure 1: ASH11 'Land West of Ashington School'

The ANP allocates the Site for approximately 150 dwellings, however the application has been submitted with 180 dwellings proposed. Since the submitted Planning Statement and Design and Access Statement has not addressed or justified the decision to include an additional 30 dwellings, we question the acceptability of the increased density. We do however note that the proposed built areas are confined to the allocated 'residential and possible community and commercial facilities' (Figure 11), and considering the absence of commercial units within the proposal, it is assumed that this allocated space has been substituted with the additional 30 dwellings. Without justification, this conflicts with the policy requirements of Policy ASH11.

The proposed built area does not encroach on the allocated open space/sports pitches, allotments and forest school, and therefore we do not have concerns that public open space is being reduced by the increase in dwelling numbers.

Horsham Landscape Capacity Assessment

In the most recent Landscape Capacity Assessment Rev. C (2021) the Site is identified as lying partially within Local Landscape Character Area (LLCA) AS1 and AS2 (Figure 2).

The overall landscape capacity of AS1 LLCA was determined to be no/low to medium-scale housing, due to the high visual sensitivity and moderate landscape character sensitivity. This is owed to the visual

prominence of the ridgeline with views from the south. However, the Site only partially occupies AS1 and is located within an enclosed field that is less visually sensitive. Any development within this area requires a strong buffer to mitigate the potential visibility from the south. The submitted Landscape Masterplan does however propose sports pitches within the southern section of AS1 which will limit the visual impact of development from the wider surrounding landscape. There is however an area of residential development also within the AS1 'no/low' capacity area which may experience adverse visual harm to the surrounding wider landscape.

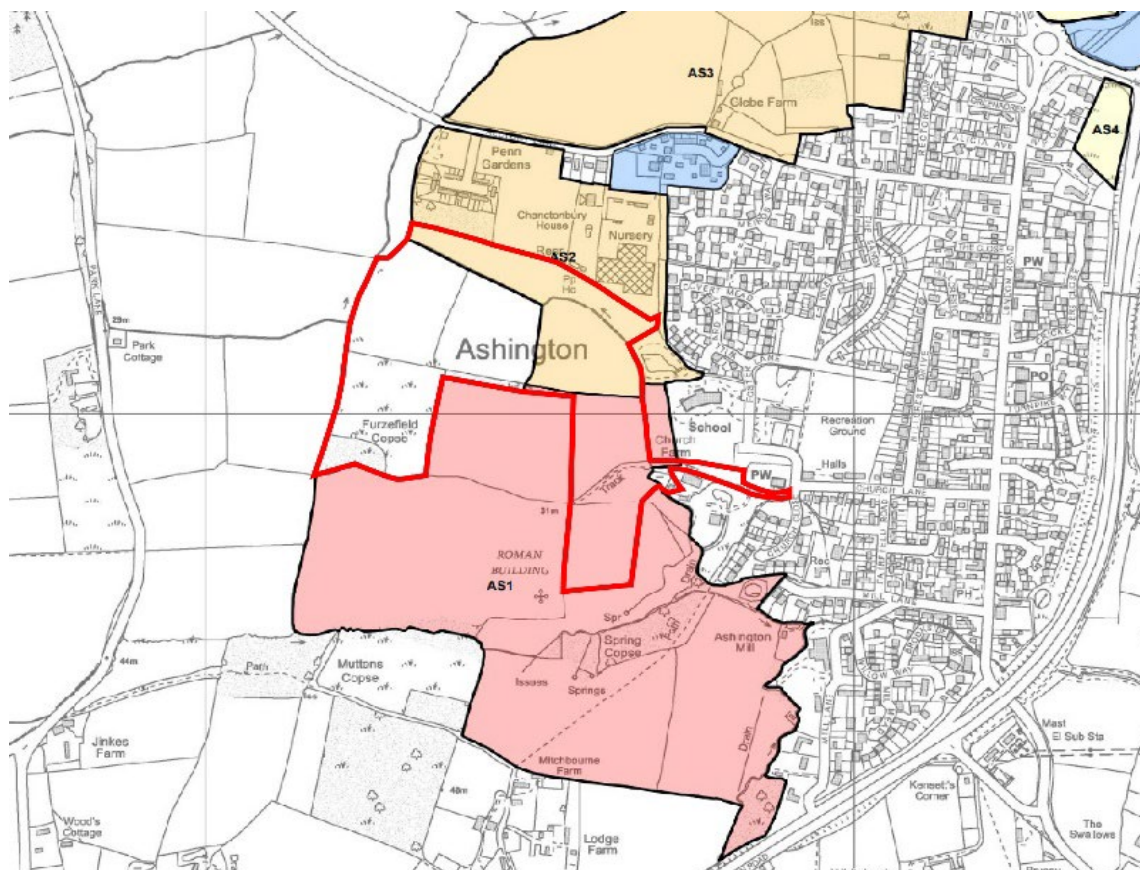


Figure 2: AS1 and AS2 of the LLCA (overlaid with red line boundary)

Covering the north-eastern corner field of the Site, the overall landscape capacity for AS2 is low-moderate to medium scale housing (Figure 2). The existing hedgerows with hedgerow trees provide some screening, however there is still the risk of development being more visually prominent within this area. Many of the landscape features in the area are sensitive to housing development, with risk of visual intrusion into the unspoilt rural countryside landscape that currently occupies small scale hedgerowed field patterns.

On review, the proposed application Site comprises only part of the AS1 LLCA (low/now capacity) assessment area. Under this LLCA, the landscape capacity states *"To the north, there are some fields which are more enclosed and less visually sensitive however there is a risk that any development around the edge of the settlement in this area would create the impression of incursion into open countryside"*. Since the proposed application is for development within the enclosed northern parcels of the AS1 LLCA, there may be some capacity for development if a strong buffer is proposed to mitigate potential visual impacts.

Review of submitted information

The application has been supported by a Landscape and Visual Impact Assessment (LVIA) prepared by Allen Pyke Associates. The LVIA (Para 2.1) refers to the 'Guidelines for Landscape and Visual Impact

Assessment' Third Edition (GLVIA3), however we would also have appreciated the LI Technical Guidance Note (TGN) 'Assessing the Value of Landscapes Outside National Designations' 02-21 be referenced within the assessment.

We would request that the photograph numbers from View 8 onwards (Page 18-24) are updated as these do not align with the submitted viewpoints in Figure 9. We would also have appreciated a reference map to be included with each of the submitted photographed views within the Visual Assessment (Section 3.4) for ease of cross-referencing locations with the photographs provided.

Notwithstanding the above, we agree with the majority of the judgements provided as part of the assessment and consider the choice of receptors to be appropriate and to include all relevant landscape character assessments.

As acknowledged in the LVIA (Paragraph 2.5), the site visits and field work used to inform the assessment were undertaken in December with limited leaf cover. For a development of this scale and in such a prominent location, we appreciate that the 'worst-case scenario' has been appraised.

Landscape Character

The LVIA (Paragraph 3.34) has identified the landscape baseline to include the 'Horsham District Landscape Character Assessment' (2003) which identifies the Site as lying within the 'J2: Broadford Bridge and Billingshurst Farmlands' Landscape Character Area (LCA). It is an area which is described as having a declining landscape condition and moderate sensitivity to change. The overall character is described as 'a low lying and relatively flat landscape becoming more gently undulating towards the southern and northern boundaries. Scattered small woods and copses, shaws and hedgerows enclose an intricate pattern of small pastures. The Assessment states that *"The area has a predominantly rural character except for some suburban influence extending into the countryside near Ashington"*.

Relevant 'Planning and Landscape Management Guidelines' for this LCA include [inter alia]:

- *"Conserve the mostly rural character of the area*
- *Ensure any new development responds to the historic settlement pattern and local design and materials. Such development should be well integrated with the surrounding landscape by setting it within the existing pattern of small native woodlands, hedgerows and shaws.*
- *Encourage new tree planting in Ashington where possible.*
- *Conserve existing woodlands, shaws and mature hedgerow trees.*
- *Restore hedgerows, especially in areas of substantial depletion, e.g., south of Coolham*
- *Promote the replacement of hedgerow trees by replanting, or by natural regeneration*
- *Manage field ponds as wildlife and landscape features"*

Table 3 'Effects on Landscape Character' outlines the anticipated effects of the LCA's as receptors. The assessment has judged the construction effects and year 1 effects (temporary) as minor adverse for the LCA's and substantial adverse within the Site. At year 15 (residual effects), the LCA's are judged as having minor-adverse effects and the Site is judged as having moderate-adverse effects. The assessment concludes that the most notable landscape effects are limited to the construction phases and any long-term effects will be local and associated with the loss of arable land.

Notwithstanding the above, we agree with the concluding judgement of the LVIA (Paragraph 5.6) that the most notable and permanent effects will result from the loss of arable farmland, however the landscape pattern is retained and all residual effects will be localised.

Visual Effects

The Effects on Visual Receptors (Table 4) provides a broadly sequential assessment of each receptor, the inclusion of separate judgements about the sensitivity, magnitude of change and significance of landscape effects across construction, year 1 (temporary) and year 15 (residual).

On review, it has been judged that views towards the Site are localised which is by virtue of the dense intervening woodland and vegetated landscape framework, within which the Site is embedded. We

agree with the methodology and support the majority of the visual effects judged. Where our judgements may differ, these are not deemed substantial and would not alter the overall stance on the proposed development.

Nonetheless, given the topographical nature of the site and natural vegetated buffer which intercepts potential visual receptors of the proposed development, we agree with the overall judgements and conclusions made that views are limited.

Recommendations

If minded for approval, the following landscape details and design advice should also be considered:

- The Horsham Landscape Capacity Assessment (2021) identified the southern parcel of the application site as being located within the AS1 LLCA which has no/low capacity for development, contrary to the Ashington Neighbourhood Plan AS11 allocation. Emphasis should therefore be given to provide a strong buffer surrounding the parcels located within AS1 LLCA to reduce the potential visual impact from Footpath 2611 and from the wider landscape of the South Downs National Park (SDNP). As per the LCA 'Planning and Landscape Management Guidelines', we advise that additional tree planting and wider hedgerow planting is proposed along the western boundary of the sport pitch and residential area to further mitigate the visual impacts of the proposal.
- The submitted Tree Protection Plan (TPP) provides details of the proposed protection measures for each of the retained trees in context of the proposals. Whilst we support the retention of the landscape framework and boundaries within and surrounding the Site, we would however request that the submitted plan is amended to include the root protection areas (RPA) to limit development within these areas. For example, a road is proposed in close proximity to the visually significant T19 English Oak, although the submitted plan does not demonstrate whether this road crosses into the RPA. We would also advise that no-dig solutions are proposed in any other scenarios where paths or roads are proposed within the RPAs.
- A Retention Basin is proposed towards the west of the Site, which occupies most of the available open space within this area, in combination with the sports pitch. We therefore recommend that other SuDS features, such as swales, are incorporated into the Site to act as additional flood mitigation, in accordance with the flood mitigation measures within Policy ASH11.
- Street trees have been well incorporated throughout the Site and as feature elements within the gateway entrance. We do however recommend that there are additional opportunities to enhance the existing hedgerows and site perimeters in accordance with the recommendations within the LCA and these should be incorporated as part of the proposal.
- We would expect that areas of parking are broken up with appropriate landscape features (i.e., tree, shrub, hedgerow, herbaceous planting) to help soften the space and improve the quality of the public realm.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, though the use of naturalised trees and shrubs and native cultivars, that are appropriate to the site conditions and would add landscape and arboricultural value could be used where appropriate and justified.
- Every effort should be made to minimise the urbanising influences (i.e., kerbing, widening, domestic paraphernalia) to ensure that the proposal is sympathetic to the rural surroundings. The proposed surfacing should also be considered carefully and opportunities for block paving across the development would help to create a characterful approach from the public highway.
- We would expect all residential plots to have appropriate private outdoor space and therefore should be accounted for when designing the layout and plot arrangement:

- Apartments should have private communal garden spaces or private amenity spaces such as terrace/balconies; and
 - Private outdoor space should be as far as possible usable rectangular garden shapes.
- The aesthetic appeal of the SuDS features play an important role in ensuring they integrate within the green open spaces and provides multifunctionality. The ground contouring, planting and inlet and outlet design should be carefully considered to maximise the amenity value. A standard approach of precast concrete and galvanised handrail for inlets/outlets should be avoided. To improve biodiversity, the attenuation areas should be combined with a range of vegetation types such as wildflowers and other nectar rich plants, trees and shrubs, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland.

Recommended Conditions

Concurrent with any future proposal or as part of a planning condition, the following information should also be provided:

PRIOR TO COMMENCEMENT OF DEVELOPMENT: SOFT LANDSCAPING SCHEME

No development above ground level shall take place until a scheme of soft landscaping for the site drawn to a scale of not less than 1:200 has been submitted to and approved in writing by the Local Planning Authority. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities. The approved scheme of soft landscaping works shall be implemented not later than the first planting season following commencement of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority). Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD LANDSCAPING SCHEME

No development above ground level shall take place until details of a hard landscaping scheme for the site have been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding (where appropriate); surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulations areas; hard surfacing materials; minor artefacts and structures (for example refuse and / or other storage units, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features); retained historic landscape features and proposals for restoration where relevant. The scheme shall be implemented prior to the occupation of any part of the development (or within such extended period as may first be agreed in writing with the Local Planning Authority).

PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN

No development above ground level shall take place until a Landscape Management Plan has been submitted to and approved in writing by the Local Planning Authority. The details should include the long-term design objectives, management responsibilities, specifications, maintenance schedules and periods for all hard and soft landscape areas, (other than privately owned plots) and including all woodland and reservoir areas together with a timetable for the implementation of the Landscape Management Plan. The Management Plan shall include details of the arrangements for its implementation and shall be carried out in accordance with the approved details, supporting documents / reports, surveys, and timetable(s) unless the Local Planning Authority gives written consent for any variation.

If you have any queries regarding the above matters, please do not hesitate to contact me.

Yours sincerely,

Megan Cowell BA (Hons) MA

Landscape Consultant

Place Services provide landscape advice on behalf of Horsham District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.