HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Ravenscroft Storrington West Sussex RH20 4EH
DESCRIPTION:	Reserved Matters Submission comprising: Layout; Landscaping; Scale; and, Appearance pursuant to Hybrid Consent (References: DC/21/2086 and SDNP/21/04702/OUT)
REFERENCE:	DC/26/1527
RECOMMENDATION:	Modification / More Information

SUMMARY OF COMMENTS & RECOMMENDATION:

Please note that these comments are made in reference to the Horsham District Council (HDC) Administrative Area and not for the South Downs National Park (SDNP) Area.

Concern is raised with the changes between the approved Parameter Plan and current proposals. These changes undermine the open space and landscape strategies and must be reviewed. In addition, landscape proposals are not sensitive to the setting and are unlikely to establish or be delivered, thus we cannot be confident that the proposals appropriately mitigate adverse effects on landscape character and visual amenity as discussed under DC/21/2086. Please see details below.

MAIN COMMENTS:

1. Please refer to landscape comments provided under DC/21/2086 for a site description as well as local and wider landscape context.

<u>Open Space Strategy</u>

2. As a result of the attenuation basin and associated parking/turning area, the 'Public Open Space' provision significantly deviates from the previously approved Parameter Plan. The 'Public Open Space' quantities are also unreliable as they include landscape buffers as well as drainage ditches.
3. The Inspector noted that '*For the number of units proposed, the OSR standards require 1,086 sqm of amenity space, and 169 sqm of play/social interaction space for children and young people*' and '*it is clear that the residential parcel is large enough to accommodate open spaces of sufficient size for each function in line with the standards, along with housing plots, estate roads and drainage features, as part of a detailed layout that could be conditioned for agreement at reserved matters stage'*.
4. Nevertheless, the Inspector also noted that the community park would '*offset the absence of formal parks and gardens space within the proposed development'*.
5. Of key concern is the deficiency of amenity space, which is roughly calculated as being ~540m^2 within the Central Green. Please note that the small area to the west of the attenuation parking is not considered to be amenity space; it is not a desirable location due to its limited accessibility to the development and its size will also be reduced further on account of point 13c. It should therefore be categorised as Natural and Semi-Natural Greenspace.
6. It is strongly recommended that the layout is thus modified to increase the Central Green area to meet the minimum requirements.

7. It is also requested that the LAP be delivered within the residential parcel. The Inspector stated that it could be located '*within the landscape buffer closer to the proposed residential development, where its visibility from the scarp slopes would be filtered by trees and hedgerows'*. This is concurred with in order to better serve the proposed scheme.
8. Please note in addition that all pieces of play equipment are balancing features. Please introduce alternative or additional types of dynamic play.

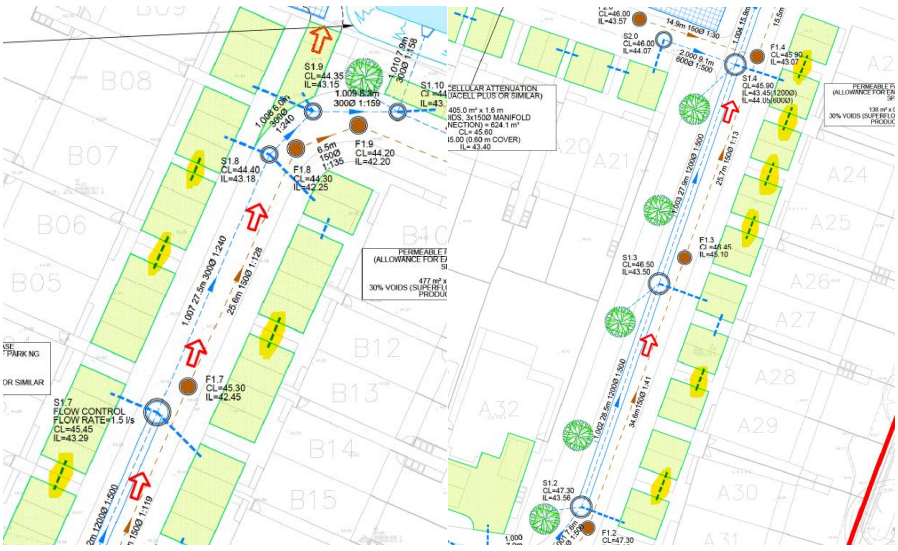
<u>Landscape, Drainage & Lighting Strategies</u>

9. It is regrettable that the area immediately north of the National Park Landscape Buffer now reflects a large increase in hardstanding, deviating from the indicative masterplan submitted under DC/21/2086. While the desire for increased allotment parking is understood, the removal of the large, vegetated verge is not supported on landscape grounds, given the abutting SDNP and rural context. Please reinstate to provide a softer transition as previously envisioned.

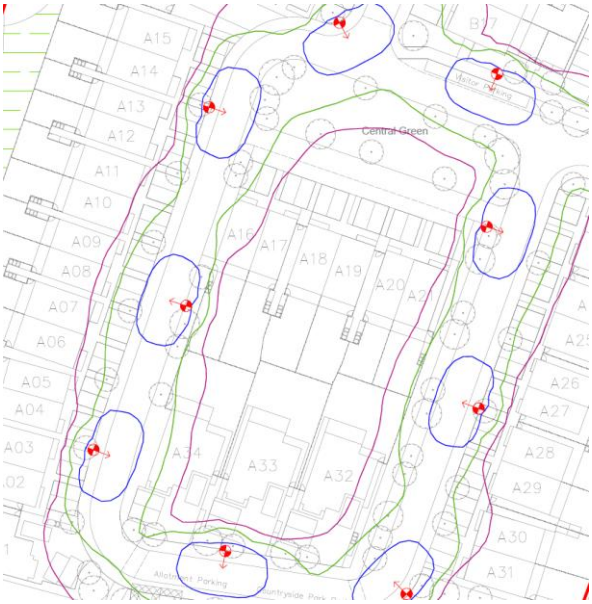


[LEFT] Illustrative Masterplan DC/21/2086, [RIGHT] Proposed Site Plan

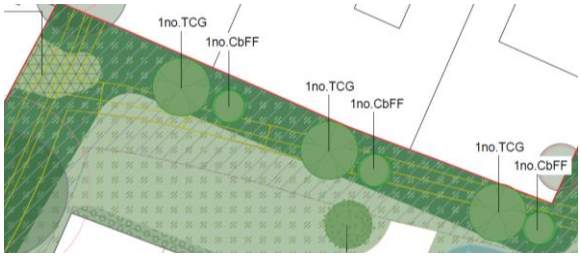
10. Delivery of new habitats and multifunctional green infrastructure, including a greater number of trees, are highlighted within the inherent mitigation measures section of the LVIA under DC/21/2086 and are therefore key to the scheme.
11. While provision of treelined streets is welcomed as part of these measures, and as required by N3.1.a of the NPPF, it is noted that the rooting medium available to nearly all proposed street trees is insufficient. In combination with proximity to underground services and hardscape in general, this will significantly limit chances of successful establishment.
    a. Inclusion of root cells to increase the volume of rooting medium is required for this scheme. Please refer to guidance from GreenBlue Urban here. Locations of proposed cells must be indicated in plan and details provided.
    b. Consideration should also be made of rationalising the number of breaks within parking to increase the planting bed sizes.
12. The inclusion of tree root barriers is also requested; please provide locations and details.
13. Given the key nature of the street trees, drainage and lighting proposals must demonstrate no conflict with landscape proposals.
    a. Please amend the drainage strategy to avoid areas of conflict with outlet connections and trees, highlighted in yellow below.



b. Please amend the lighting strategy and/or the landscape proposals to avoid areas of conflict between lighting columns and trees.



c. Please amend the landscape proposals to ensure no tree or scrub planting within existing ditches/watercourses.



14. Please provide a proposed and existing levels, contours and/or earthworks plan in order to demonstrate the relationship between the development and the surrounding landscape.
    a. Of key concern is the attenuation basin. As per Horsham District Council's Open Space, Sports & Recreation Review 2021 (OSSR), attenuation basins must not look like steep sided engineered structures, must blend aesthetically into surrounding contours, and must not have gradients exceeding 1:3. Safety fencing is not desirable in this location, so changes to levels must be gentle. Varied depths using a combination of shelves/benches to provide variations in vegetation structure is recommended. More detailed information is thus required, as above, and cross sections are recommended.
15. As above, planting over and above proposed grassland is expected within attenuation basins. Please amend.

Landscape Proposals

The following amendments are required prior to determination:

16. As per previous landscape comments made under DC/21/2086, the introduction of ornamental planting can erode the rural character of the area. This is further emphasised by the Management Objectives within the Landscape Management Plan (LMP) such as, '*Retain and enhance existing landscape character and visual amenity, and ensure that the new built form is integrated within the immediate and contextual landscape fabric*' and '*Extend and enhance the existing habitat on site, continuing to maintain this in a way that is sensitive to existing local flora and fauna'*.
17. While some ornamental species may be considered acceptable due to the abutting suburban context and due to individual ecological and amenity benefits, many species within the landscape schedule do not meet this description. Further, some street tree species are not appropriately placed within the 'large', 'medium' and 'small' categories. Please refer to HDC's Landscape Character Planting Guide and make the following amendments:
    a. *Acer campestre Elsrijk* is not considered a large species and should be replaced by a large species reflective of the landscape character area, such as *Quercus ilex*.

b. *Betula utilis Jacquemontii* is overly suburban in appearance should be replaced by *Betula pendula* or similar.
c. *Prunus laurocerasus Rotundifolia* is recognised by the Sussex Biological Records Centre as a Sussex Invasive Non-Native Species. Please remove and replace with species such as *Fagus sylvatica.*
d. Ligustrum ovalifolium and Photinia Red Robin are overly suburban in appearance should be replaced by *Fagus sylvatica* as above*, Juniperus communis, Cytisus scoparius* or similar.

18. 1no. Liquidambar styraciflua is located within the eastern boundary. Please relocate it within the streetscene or Central Green where it can provide greater amenity value.
19. Given the location within the public realm, the boundaries highlighted in yellow, below, are requested to reflect brick wall as opposed to close board fencing.



The following amendments are requested prior to determination, however may be secured via condition if preferred:

20. Please include quantities for the Ornamental Shrub Mixes, 'Aquatic Planting – Marginal' and 'Seasonal Bulbs'.
21. Please include 'Aquatic Planting – Marginal' in plan (as per point 15) and in the legend.
22. Permanent water levels are not expected for the attenuation basin; please remove Aquatic Planting – Emergent and Submergent accordingly.
23. The covered cycle and refuse storage facilities with green roofs are welcomed; specification is requested.
24. The use of chemical fertilisers, pesticides and herbicides including glyphosate should be avoided, particularly in proximity to the SDNP and existing ditch network. Non-chemical methods of weed control should be specified as the preferred approach, except where treatment is required for the control of Schedule 9 species. Please refer to pan-uk.org for guidance and resources on alternative methods. Any treatment required for invasive species should be undertaken in accordance with appropriate ecological advice.
    a. It is encouraging that the LMP frequently suggests weeding to be undertaken by hand, however the following sections of the Landscape Specification should be amended accordingly:
        i. 3.9 '*spot treated with a non-residual glyphosate based herbicide'.*
    b. The following sections of the LMP should be amended accordingly:
        i. 7.1 '*Treat areas with an approved herbicide';*
        ii. 2.8 '*treat existing weeds with a non-residual based, herbicide';*
        iii. 4.20 '*apply herbicide treatment as appropriate';*
        iv. 4.27 '*apply herbicide treatment as appropriate';*
        v. 5.1 '*Treat areas with an approved herbicide';*
        vi. 5.7 '*Treat areas with an approved herbicide';* and
        vii. The Management and Maintenance Schedule.
25. Where mulch is applied around tree stems, a 120mm collar should be left free of mulch to prevent rotting. Please include under 3.18 of the LMP.

26. Please specify under 3.20 of the LMP that tree stakes and ties are to be removed upon successful establishment or after 4 years of planting, whichever is sooner.
27. As above, please specify under 4.28 of the LMP when shelter guards are to be removed.
28. It is recommended that 5.12 of the LMP is amended to reflect that arisings must be removed within 3 days of cut, as opposed to 7.
29. Please consider, in addition and in relation to establishing meadow, the sowing of Rhinanthus minor (Yellow rattle) in order to reduce competition from grasses.
30. Please include maintenance for hard landscape and equipment within the LMP.
31. Please provide a plan clearly identifying the areas of landscape management and maintenance responsibility and the party responsible for each 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.

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	20/11/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	23/11/2026