



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	New Place Nurseries London Road Pulborough West Sussex
DESCRIPTION:	Reserved Matters application pursuant to Outline Planning Consent DC/21/2321, as varied by application DC/24/1204. The Reserved Matters comprise details of 160 no dwellings, associated internal access roads, parking and landscaping for areas east of the right of way. Details of appearance, landscaping, layout and scale to be considered.
REFERENCE:	DC/24/1676
RE-CONSULT:	1 st set of comments in black 2 nd set of comments in blue 3 rd set of comments in green
RECOMMENDATION:	Objection / More Information / Modification Objection / More Information / Modification Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

3rd set of comments

While we are pleased that hard and soft landscape plans now detail proposals for the whole scheme, 3 of 4 of our previously identified fundamental concerns remain. These are:

- Reduction in viewing corridor
- Significant changes to topography and levels plan not indicating proposed contours
- Built form pulled too close to the eastern boundary

These concerns, in combination with the concerns listed below must be resolved prior to determination:

- Play area buffer
- Lack of drainage information and thus coordination with the landscape strategy
- Lack of clarity on replacing the poplar treeline
- Fencing off the 'countryside park' area

As this is our third set of comments and the concerns above are not minor, our recommendation is that the application cannot be supported on landscape grounds as it's seen

as a significant departure from the approved framework plan. The proposed layout is considered to have an adverse effect on existing landscape features and overall would deliver poor quality development.

2nd set of comments

The proposals have been updated since our previous comments, however the majority of our comments have not been addressed. Fundamental concerns remain, in addition to new concerns raised on account of the changes. The following is of key importance and must be resolved prior to determination:

- Reduction in viewing corridor
- Significant changes to topography and levels plan not indicating proposed contours
- Combined hard and soft landscape plans do not show the entirety of the proposals
- Built form pulled too close to the eastern boundary

We continue to recommend that further consideration is given to the site layout and overarching landscape framework to ensure that landscape and visual effects are appropriately mitigated. In particular, we seek assurance that the rural and verdant qualities experienced on site and its surroundings are retained, and that the scheme is sensitively and successfully integrated into the receiving landscape.

Please read updated comments in blue below, with further comments added at the end of the document.

1st set of comments

Concern is raised with the significant change between the framework plan and the current proposals. This is undermining the landscape strategy and must be reviewed. The current scheme is not sensitive to its setting and considered to give rise to significant effects on the landscape character and amenity of the area.

In addition, further information is requested as well as consistency between plans in order to make an informed assessment.

Please note that we concur with comments made by HDC's Arboriculturalist in regard to seeking justification for the layout conflicting with the minimum recommendations of root protection area (RPA) encroachment of trees, as our chief concern is with the safeguarding of existing, mature landscape features in order to conserve the landscape character.

MAIN COMMENTS:

Development Framework overlay/ concept masterplan:

12. Significant changes have been made to the framework plan and concern is raised with the effect this has on the existing landscape features; but also the landscape concept design and key features, such as the landscape framework and the viewing corridor through the site, which is now significantly diluted.

While it is welcomed that the dwellings have been set back from the PRow, the viewing corridor remains diminished in comparison to the approved parameter plan, particularly to the south where built form has encroached the approved shape. We have reviewed the technical note however we do not concur with the conclusion that the changes enhance the views. Long range views to the South Downs National Park (SDNP) were cited as one of the principle objectives of the development approved under DC/21/2321; we highlight the following excerpts from the Design and Access Statement (DAS):

- *'Utilise the topography of the Site to...incorporate the opportunity for distance views over the village'*

- *'Central view corridor affording long range views southwards to the South Downs National Park'*
- *'An open green space corridor running north-south through the centre of the Site that not only connects the proposed development with the countryside park, but also provides local amenity and framing and enhancement of views towards the South Downs National Park'*

We consider this narrowing to be significant, as opposed to slight [see design evolution below]. The previously approved corridor shape reinforced the countryside character by virtue of a wide cone absent from development, positively contributing to the long distance views and thus recreational enjoyment of users of the PRow. The newly proposed built form within this cone creates short and medium distance views that while unlikely to fully block views of the SDNP, detracts from the sense of place and the countryside setting. We request that framework plan is amended to that previously approved or further consideration made in order to meet aims and objectives as cited above.

If this is disagreed with, we request a verified photomontage of the proposals from EDP LVA Viewpoint 2/ Finc Viewpoint 1 to demonstrate that the long distance views are retained and enhanced.



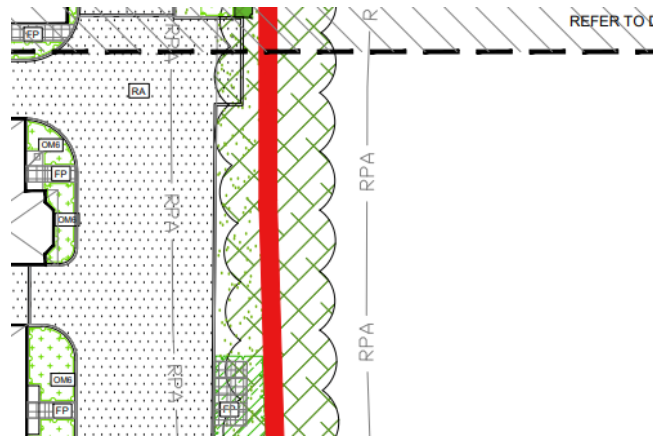
13. The planted corridor (noted as 2, within the illustrative layout under DC/21/2321), has been removed and the proposed dwellings moved hard against the footpath/road. The original concept had been introduced to mitigate some of the development effects. The wider landscape buffer within this alignment was proposed to filter views and soften the appearance of the development in the elevated position. As such, this must be reinstated as it's an important mitigation measure and considered as part of the acceptability of the scheme.

As demonstrated in the images above, this has not been addressed in a meaningful way. Please amend as necessary.

14. The close proximity of the development parcels to the existing landscape features must be reviewed and closely align with the approved parameter plan. The original strategy retained and enhanced existing landscape character features, key to the character of the area and considered as part of the landscape mitigation measures embedded within the scheme. The current proposal is in part encroaching within RPA's and does not comply with BS in places, placing these features at risk.

The updated layout pulls built form even closer to the eastern boundary than previously proposed. As above, this has been a key, longstanding concern and thus we are not supportive of this change. Objectives within the DAS under approved DC/21/2321 specific to the eastern boundary include, 'Soft development edge and enhanced boundary planting to filter views from wider countryside'. The layout must therefore be reverted and/or revised to meet this objective.

Further, the updated layout encroaches upon the RPAs of the existing treeline, which places it at risk of decline and future loss as a result. As previously advised, given the undeveloped nature of the site, RPAs must be entirely avoided and demonstrate compliance with BS 5837:2012 5.3.1 in order to secure the retention and healthy conditions of these key landscape features.



In addition to specific comments and recommendations made below, we request the following information prior to determination:

15. Plan demonstrating coordination of landscape proposals, tree planting, underground services and lighting. We note that the main avenue of trees is included within drainage proposals, however there are discrepancies with this and the landscaping proposals. Notwithstanding this, the entire tree scheme must be reflected.

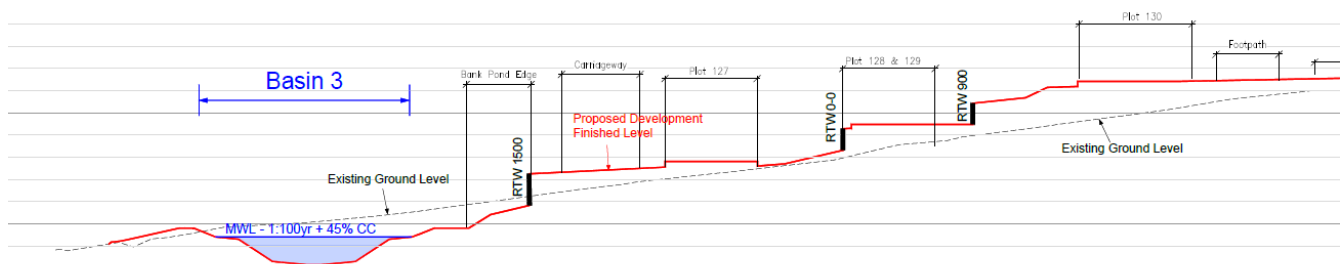
Not addressed.

Levels

16. We are cognisant of the challenges with the site's topography, however current proposals encroach into trees RPA's and create building platforms that significantly change the existing topography and create the need for significant cut and fill and high retaining walls. We expect the setting out of the development to be more sensitive to the existing landform and explore siting the building plateaus working with the land levels (including orientation of buildings too) rather than imposing it. Please review.

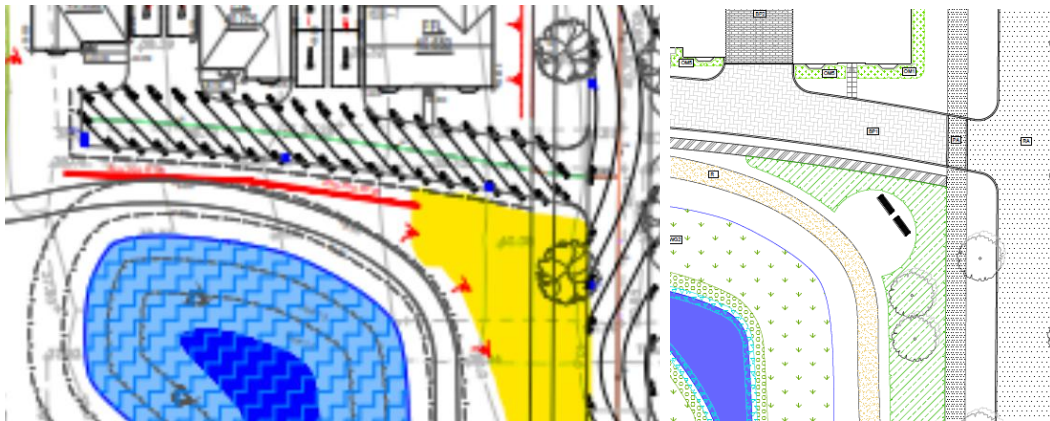
The site levels have not been addressed and continue to demonstrate significant changes to the topography that result in even further surplus material, thus we are not supportive of the changes. To further reiterate the aims and objectives cited within the DAS under approved DC/21/2321, 'The development layout has been designed to respond sensitively to the Site's topography, improving development efficiency and minimising land lost to re-profiling'. Further consideration must therefore be made to ensure the proposals are sensitive to the existing landform and the level of cut and fill minimised.

17. We highlight for example the retaining walls to the north of each attenuation pond. 1.5m drops is of concern and would require balustrades to be added. All of these highly engineered interventions do not lead to sensitive design or a landscape led scheme.



We note 1.5m drops remain. As above, it is imperative that these are reduced or removed entirely to ensure a sensitive design. Please see point 42 for further comments.

18. The levels plan does not appear to reflect contours or retaining walls fully. For example, clarification is requested for the area highlighted in yellow, below. Is a retaining wall also needed near the footpath?



The retaining wall in this location has been removed, however the levels plan still does not reflect proposed and existing contours, thus landform details remain unclear. This must be addressed in order to confirm the suitability of the scheme.

Soft landscaping

19. Where needed, retaining walls must be softened in order to better blend in with the surroundings and not appear out of place. Where appropriate, we recommend planting hedgerow in front and back of the walls, kept to a height of 1.2m above the ground level from the top of the walls.

Not addressed. Please amend.

20. We note that landscape proposals do not cover the entirety of the scheme, therefore key areas are absent for review, including the westernmost edge and areas surrounding the north-south treelines. Please provide detailed plans for the entirety of the scheme, including a key. See rough sketch below indicating the missing areas.



Not addressed. Plans for the entirety of the scheme are required.

21. North-south tree lines such as G18 are proposed to be removed in Arboricultural plans, however these are shown as 'Existing trees / vegetation retained' in the Landscape Masterplan/ approved parameter plan. As above, the Landscaping Proposals do not cover this area, therefore further information is required to be submitted. We request that these are retained as they're seen as key structural feature that positively contributes to the landscape framework and to embed the scheme into the landscape.

We note the updated AIA which details, '*Poplar collection to be repollarded (to previous pruning points) components with excessively decayed boles to be removed*'. In order to ensure the longevity of this landscape feature and enhance it in line with the approved development objectives, we request that every removed tree is replaced with a species listed under 'Native Parkland Trees' within the Plant Schedule. Please include details within the landscape plans and planting schedule.

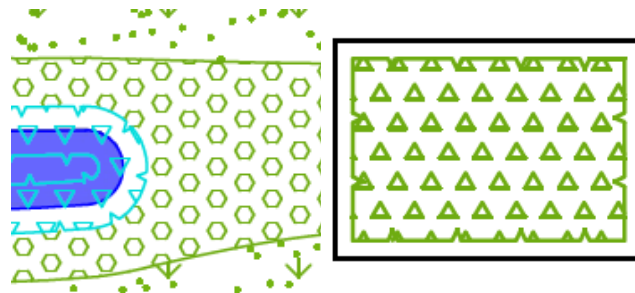
22. Tree species and sizes are detailed within the Planting Schedule, however we request to see this information within the landscape proposals in order to assess suitability.

Not addressed.

23. We note the removal of the orchard from the proposals. Please reinstate.

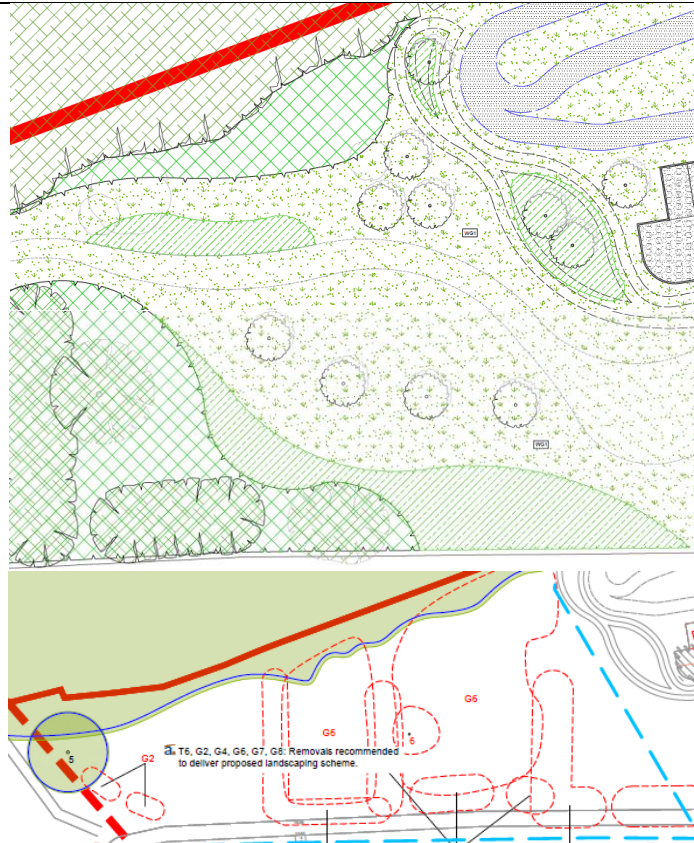
Not addressed. It remains within the Statement of Compliance, however does not appear in plan. Please reinstate.

24. Clarification is requested in regard to the hexagonal hatch [below, left] which does not appear in the legend, and if it is meant to indicate reedbed [below, right].



Hatch updated. Closed.

25. Clarification is requested in regard to the green diagonal hatch [below] which does not appear in the legend. It appears that these areas illustrate retained groups of trees and vegetation, however Arboricultural plans indicate their removal.



Amended, with thanks. Closed.

26. Please include the following species within the Planting Schedule:

- a. 'Aquatic/Marginal/Wetland'

Species have been added, with thanks. Given their planting requirements we recommend that they are separated into the relevant categories listed above; aquatic species require permanent water levels, for example. However, this can be secured via condition. Closed.

- b. 'Reedbed' – please note that reeds can dominate other vegetation and form a monoculture without increased/specialised maintenance. We advise that only native species be used and sparingly.

Quantities not yet added, however this can be secured via condition. Closed.

27. Clarification is requested as to whether 'Native Shrub Planting' in the landscape proposals correlates with 'Native Woodland and Understorey Mix' as detailed within the Planting Schedule.

Separate categories have been provided within the planting schedule, with thanks. However, we note that while shown within the legend, the location of the 'Native Woodland and Understorey Mix', or 'Woodland Mix' is absent from the plans. Please clarify where woodland planting is proposed.

28. We recommend considering an alternative to *Prunus laurocerasus* (Cherry laurel) from planting mixes OM3 & OM4 as it is invasive, overshadowing and outcompetes other planting.

Closed, with thanks.

29. We note that some areas on the eastern boundary appear to be left clear of planting – see examples below. Given that our comments under PE/24/0081 and DC/21 both state to pull, 'the built form edge away from the eastern boundary to introduce woodland shaw / belt planting of native species', we continue to recommend that these areas are densely planted to assist the transition into rural countryside.



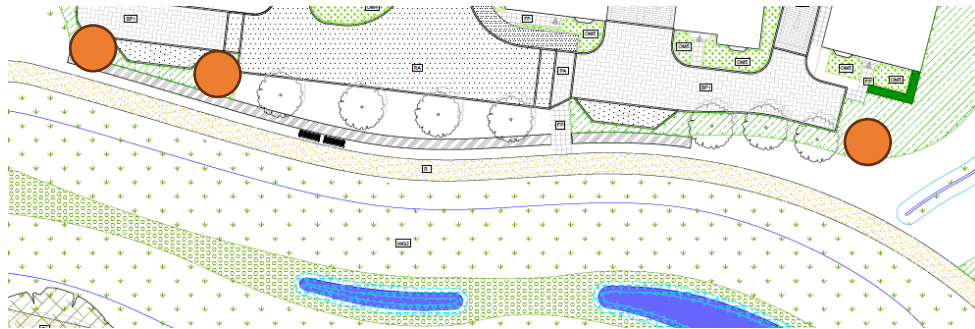
Layout has changed – see point 14. Closed.

30. As per our previous comments under PE/24/0081, parking bays must be broken down into smaller sections and include meaningful planting to soften courts. Please provide further tree planting, particularly on the eastern and northern stretches of the bays below.



Layout has changed. Closed.

31. As per our previous comments, we request the provision of trees in between the attenuation basin and dwellings on the southern boundary of the central dwelling parcel. Please see our suggestions indicated in orange, below.



Layout has changed. Closed.

Hard landscaping

32. We request specification for the following treatments and structures:

- Informal path
Not addressed.
- Play mulch – we recommend the use of wetpour which is easier to maintain long term
Not addressed.
- Play equipment, benches & bins – please note that these must have steel footings
Not addressed.

- d. Entrance feature

Not addressed.

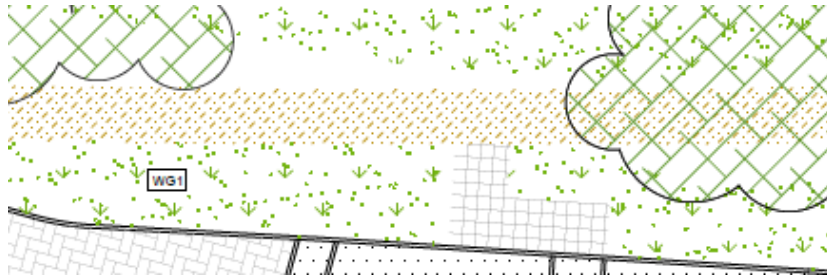
- e. Headwalls - we recommend a soft, naturalistic approach such as cladding in Horsham stone and introducing planting

Not addressed.

- f. Retaining walls

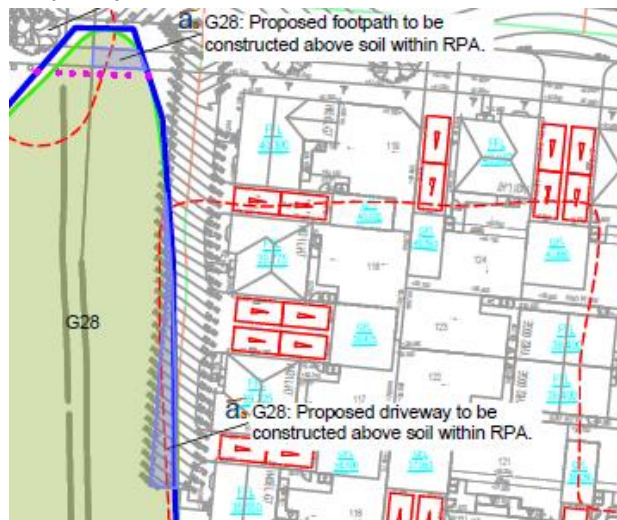
Not addressed.

33. We recommend amending the flag paving in this location [below] to be informal path, which is more suitable for the surrounding context.



Layout has changed. Closed.

34. We request that the road layout is adjusted to avoid the RPA of Category A G28, which is classified as a 'high value collection of trees'. Given the undeveloped nature of the site, and approved parameter plan, it is required that RPAs are avoided in order to retain and protect existing trees and hedgerows, as per aims set out within the Design and Access Statement, as well as policy 33 of the HDPF.

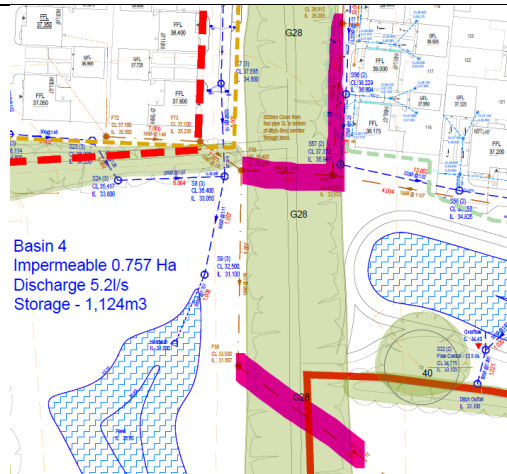


Closed, with thanks.

Drainage

35. We note several conflicts between drainage proposals and retained trees.

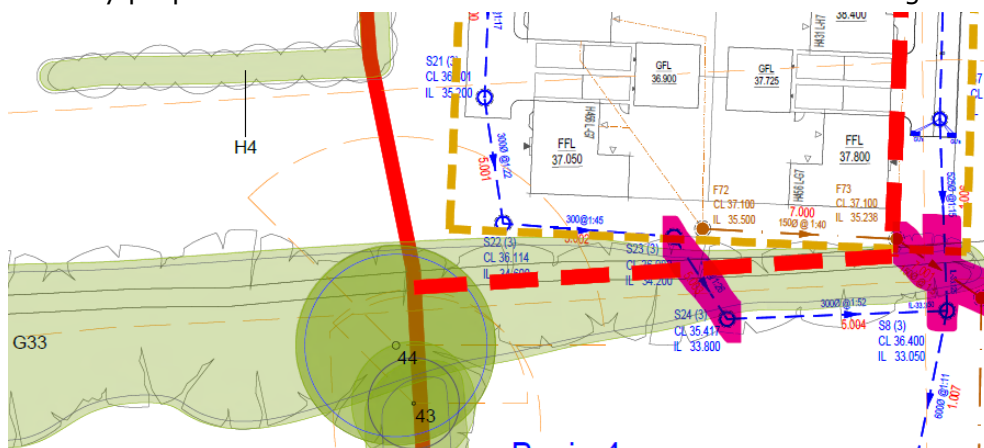
- a. Of key concern is aforementioned Category A G28, where multiple drainage paths are proposed [highlighted in pink, below]. We recommend that drainage avoids the RPAs of G28 entirely and that other routes are explored. If it can be demonstrated that there is no alternative option but to encroach G28, only one drainage trench should be proposed at minimum and advice from the HDC Arboriculturist should be sought in order to minimise adverse effects.



While it is welcomed that the southern drainage run has been removed, the northern run remains [highlighted in pink, below]. Given that the foul run no longer connects to the western parcel, we request that it is removed entirely to avoid Category A G28.



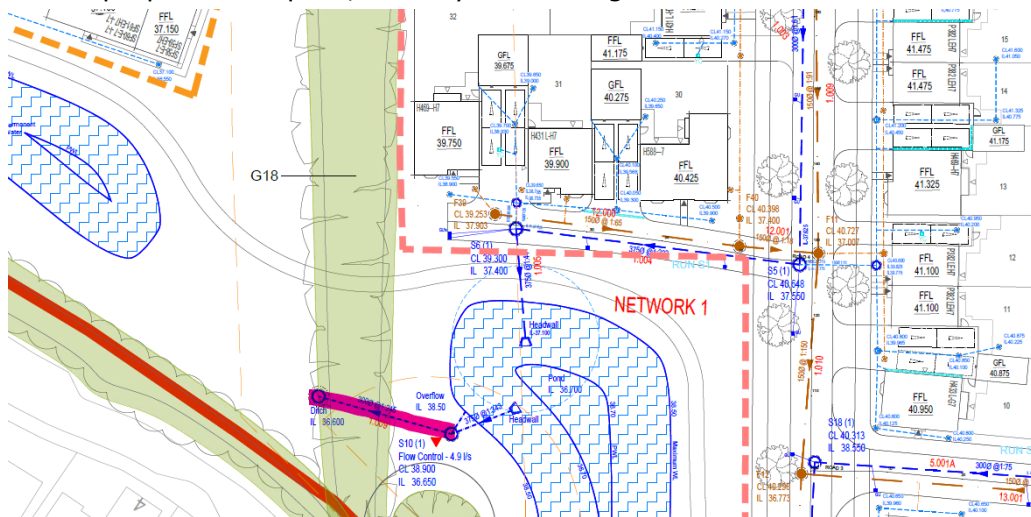
- b. As above, multiple drainage routes pass through G33 [highlighted in pink, below]. While this group of trees is of lesser quality than G28, it still positively contributes to the character of the area, therefore should be retained and safeguarded. Please modify proposals to avoid and minimise disturbance to the rooting medium.



While one route has been removed, with thanks, further routes remain [highlighted in pink, below] and the updated orientation will cause further conflict with G33 and associated RPAs. As previously requested, please modify proposals to avoid and minimise disturbance to the trees and rooting medium.



- c. As above, please modify drainage proposal [highlighted in pink, below] to align with the proposed footpath, thereby minimising disturbance.



Closed.

36. Please amend Section 3.1 of the SuDS Management Strategy to remove glyphosate. We strongly recommend that chemical fertilisers, pesticides and herbicides including glyphosate are not to be applied at any time due to impacts on existing and proposed waterbodies, wetland, woodland, ditches and hedgerows, and the protection of their ecological features. Alternative methods for weeding should be considered such as hot foam or hot water systems, steel brushing in combination with acetic acid spraying, or electronic control systems.

Not addressed.

Open Space

37. Please submit a land budget plan demonstrating sizes, buffer zones and walking distances. We echo comments made on 03/04/2025 by HDC Parks and Countryside, particularly in regard to the 20m buffer zone as the proposed location of the LEAP does not appear to meet this criterion. We recommend that Horsham District Council's *Open Space, Sports & Recreation Review 2021* (OSSR) is referred to for guidance.
38. As per our previous comments, BMX dirt and earth tracks should meet the requirements of the RoSPA safety guidelines (approved by British Cycling) and designed by bike track experts to integrate organically into the green space, using planting and different forms of features to create a sense of place. We expect:

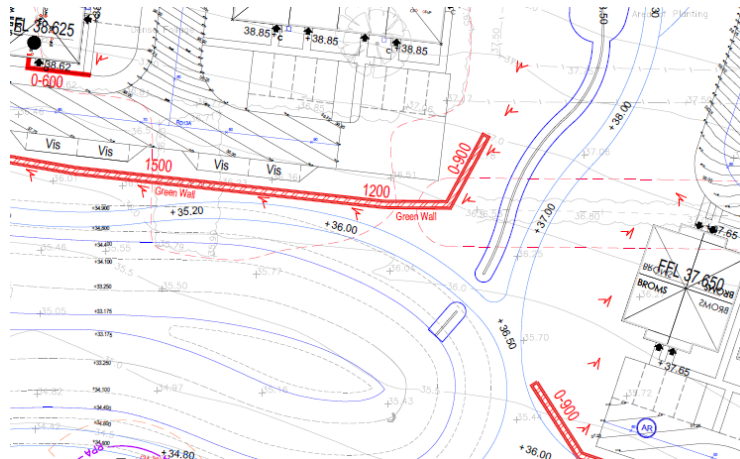
- a. Details of all hard and soft landscaping, including installation details and sections, fall zones, surfacing materials, features and boundary treatments.

Not addressed.

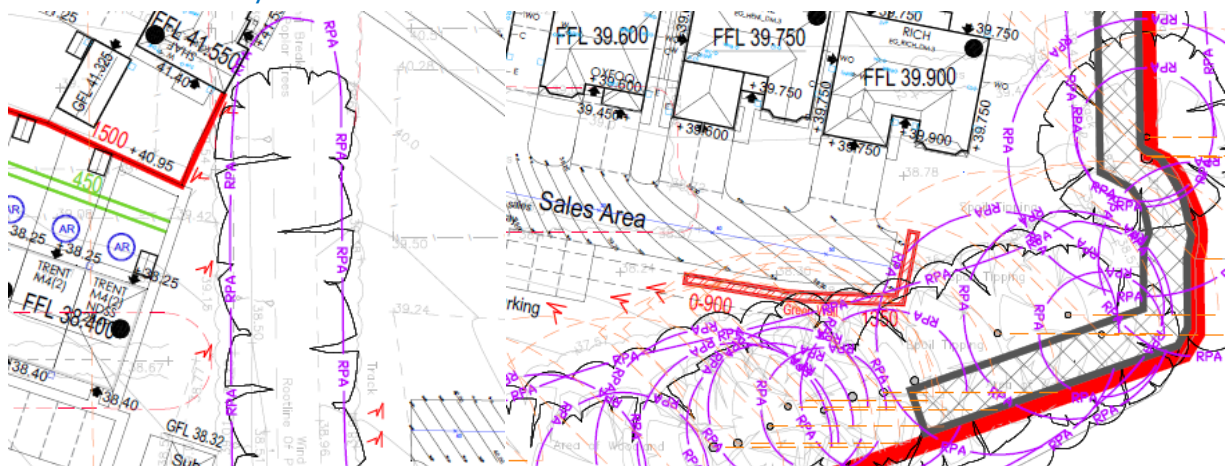
Further comments

Layout & Levels

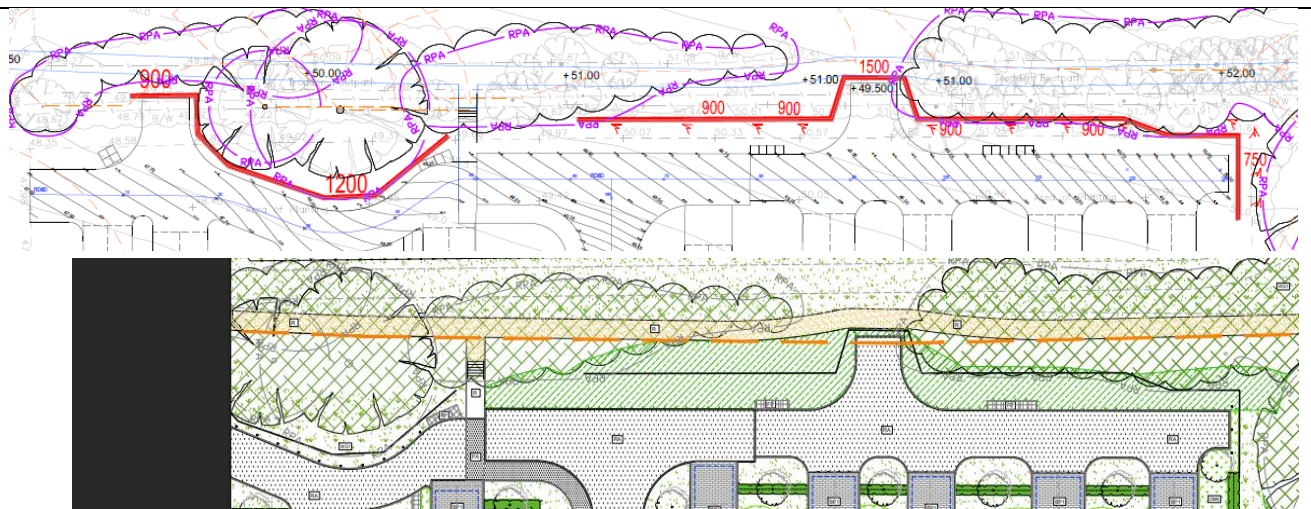
39. As per point 18, the levels plan remains unclear. Contour lines and gradients are required to ensure the suitability of scheme. We highlight the slopes indicated below.



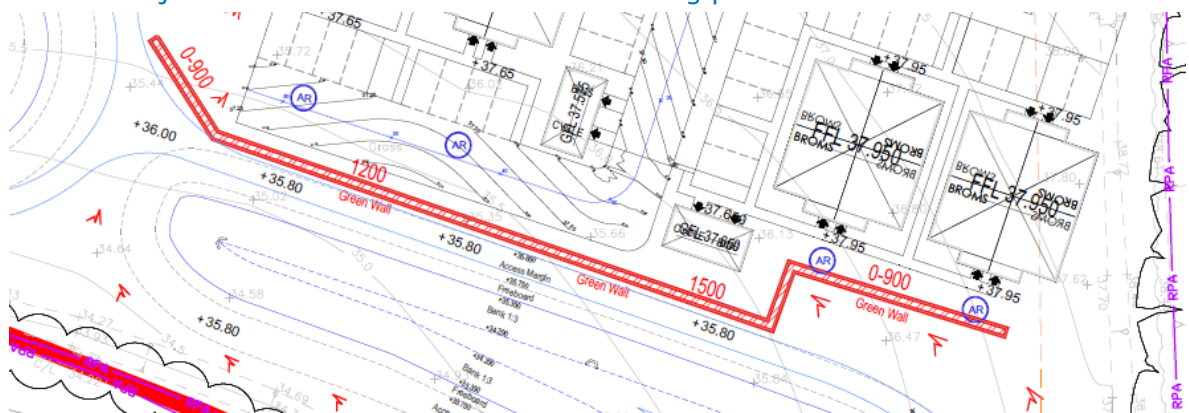
40. Further, we note multiple instances of 'green wall' in place of a retaining wall. Clarification is requested.
41. Please note that RPAs should be clear of mounding/earthworks as sufficient oxygen levels are essential for their long-term retention. The loss of these trees would result in adverse effects to the landscape character and amenity of the area, thus their longevity should be secured. As such, and as previously requested, existing and proposed contour lines are requested to understand the effects of earthworks on existing landscape features. Please see areas of key concern below:



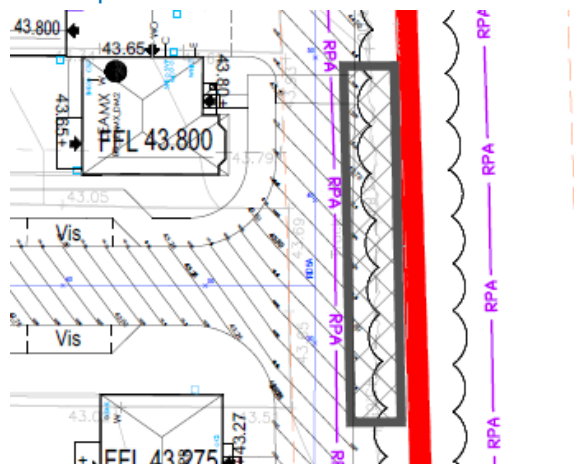
42. As previously commented, concern is raised in regard to drops of 1.5m and would require balustrades to be added. We note further instances of these drops on account of the changes to proposals, two of which are highlighted below as unacceptable:
 - a. Adjacent to the PRoW



b. Adjacent to an attenuation basin indicating permanent water levels



43. There are multiple instances of a dark grey box with a cross hatch underneath RPAs with no label. Clarification is requested.



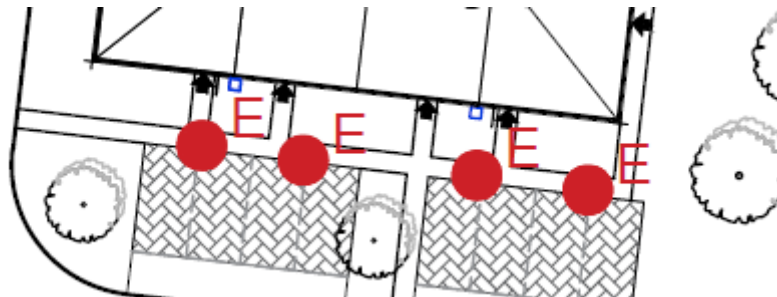
44. We note further inconsistency in plans. The central treeline is retained within the masterplan [below, left] and partially removed in the Tree Protection Plan [below, right]. As previously commented, no Combined Hard and Soft Landscape Plans have been provided for this area. We request clarification and that plans are updated for consistency, noting that any removed trees should be replaced, as per point 21.



45. We note the wildflower meadow in the northeastern open space parcel is fenced off. Clarification is requested as to its purpose, given the original aims of this area being proposed as a Countryside Park.

Hard and Soft Landscaping

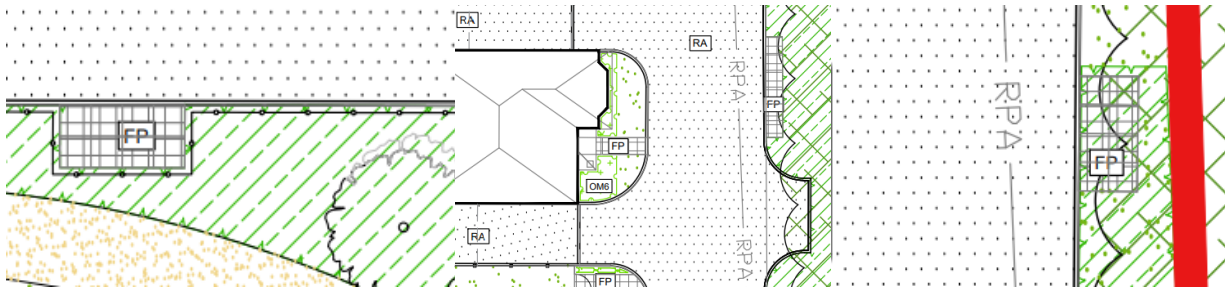
46. Much of the hard landscaping has been updated to reflect tarmacadam. Given the high degree of visibility in combination with the site's rural setting, the previous materials are preferred as they were softer and thus more appropriate. Please revert the following:
- Driveways and shared surfaces back to block paving
 - The parking for the pump track back to grass-crete with stone infill.
 - Footpaths back to informal buff treatment, particularly within the northern and western open spaces.
47. The permeable block paving appears to be a buff colour within the Landscape Masterplan, however it is detailed as charcoal within the Planning Layout. As above, buff or earth tones would be preferred given the countryside location. Please amend and ensure consistency across plans.
48. We note that EV bollards appear to be located within paths [see example below]. Please amend to ensure no obstruction to paths.



49. It is our judgement that the triangle within the updated path layout is not conducive for meadow planting or management. We recommend replacing with low maintenance planting and a seating area.



50. Please update the boundary of garden for plot 112 to reflect brick wall.
51. Please remove areas of flag paving from soft landscape, particularly where RPAs are concerned. If these are intended as areas for refuse and recycling collection, from experience of other new development sites these are rarely utilised and thus unnecessary.



52. The Tree Protection Plan should be coordinated and updated to reflect proposed drainage runs.
53. Please confirm if the sales parking is to be retained as visitor parking spaces once its need has been met.

Drainage

54. We note that individual drainage connections have not been proposed for dwellings. This must be done in tandem with landscape plans to ensure that the proposed tree strategy is not diluted later on.
55. Connections have also been removed from the permeable parking [updated proposals, right]. Please reinstate or clarify.



Planting Schedule

56. Please provide quantities to the plant schedule.
57. Please provide girth sizes for trees.
58. While Hamamelis x Intermedia 'Arnold Promise' is welcomed in the planting schedule, it is not deemed appropriate as a street tree. Please include as an ornamental shrub and replace with a tree species with a taller height once established.
59. Nymphaea alba is not appropriate given the limited water surface area. Please remove.
60. Hedgerow and ornamental hedge planting should reflect 5 per linear metre, as opposed to 1.
61. Please include heights for hedgerow species; we recommend 60-90cm.
62. Please update the bulb planting densities as 1 per metre is not sufficient.

Planting Notes

63. In order to ensure that establishment is not hindered by planting too deep, tree pit sizes should not be prescriptive. We recommend that tree pits are no deeper than the root system and at least one and a half times as wide. No fertiliser should be used. Please amend as necessary.
64. More information is requested regarding the creation of wildflower meadow. Specific measures are required to ensure the successful establishment of wildflowers.

Landscape Management Plan (LMP)

65. We strongly 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. Alternative methods for weeding should be considered such as hot foam or hot water systems, steel brushing in combination with acetic acid spraying, or electronic control systems. Please refer to pan-uk.org for guidance and [resources](#). Please amend the LMP accordingly to remove mention of herbicides and reflect alternative methods as above or hand weeding alone by careful digging or selective scything.
66. Stakes and ties should be removed upon successful establishment or after 4 years of planting, whichever is sooner. Please amend.
67. More information is requested regarding the management of meadow management, as prescriptions will change yearly over the course of its establishment.

RECOMMENDED CONDITIONS: N/A

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	24/02/2025 18/12/2025 12/02/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	11/03/2025 18/12/2025 12/02/2026