

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at Hornbrook Farm Brighton Road West Sussex
DESCRIPTION:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
REFERENCE:	DC/26/0530
RECOMMENDATION:	Holding Objection/ Modification

SUMMARY OF COMMENTS & RECOMMENDATION:

No concerns are raised regarding the proposed development in principle, however the reduction in dwellings, including the removal of the northeastern parcel, is requested in order to have appropriate regard to the setting of the High Weald National Landscape (HWNL) as per Strategic Policy HA10: Horsham Housing Allocations '1' HOR1 'a' of HDC's emerging Local Plan (Jan 2024). Current proposals do not make a positive contribution to maintaining the natural beauty of the National Landscape, as per the NPPG (Paragraph: 042 Reference ID: 8-042-20190721), and as such, the current layout is not supported on landscape grounds.

Further consideration should thus be given to the site layout, in combination with further regard to the retention and enhancement of existing historic landscape features in order to mitigate direct and indirect impacts on the setting of the National Landscape, as per Paragraph 189 of the NPPF, as well as the residual substantial adverse landscape and visual effects identified within the LVIA.

Modification is also required in relation to open space provision and the landscape strategy to ensure that proposals are appropriate, inclusive and landscape-led.

MAIN COMMENTS:

LVIA

1. The LVIA provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020). While some conclusions and judgements are concurred with, others are disputed - see examples below.
2. The assessment is found short of identifying the various landscape receptors, which in our view limits the full understanding of the effects the development will have on landscape character.
3. In addition, while some mitigation measures described could be successful in reducing the identified effects, most do not appear to have been carried through to the layout and landscape strategy, therefore the subsequent residual effects are largely unchanged.
4. The development will have an adverse effect on some of the character components of the High Weald National Landscape (HWNL) as identified in the HWNL management plan, given indirect impacts on Routeways, Woodland, Aesthetic and Perceptual Qualities (tranquillity and the way the rural qualities of the site contribute to the appreciation and enjoyment of the

HWNL) and Dark Skies. Therefore, we consider the development will give rise to minor adverse effects at a local level and on the natural beauty of the HWNL.

5. The site is judged as not being tranquil, however tranquillity is indeed experienced throughout much of the site. This is most acute towards the northern boundary adjacent to Horn Brook and in particular to the northeast where in proximity to the HWNL and Ancient Woodland (AW).
6. The priority woodland bounding the north of the site corresponds with the large wooded buffer to the built up area boundary (BUAB) of Horsham. As such, it is disagreed with that the scheme is framed by development, given that this wooded buffer along Horn Brook functions as a defensible boundary. This is not the case for the southern boundary, however.
7. While we concur that the Site does not form part of a valued landscape for the purposes of the NPPF, its positive relationship and contribution to the setting of a valued landscape, along with its clear intervisibility and function as an undeveloped buffer, remains a key consideration.
8. As per point 2, there is a fair assessment of the wider landscape character and context, however it is considered that key landscape receptors should be identified and assessed separately in addition to 'The Site (landscape resource)'. We expect to see descriptions of effects on all landscape receptors, including landform/topography, field pattern, structural vegetation including the veteran Oak (T56), others approaching veteran status (T37, T38) and historic hedgerows (H3, H4, H5), and all character guidance highlighted in the report, such as NCA 122, LCA HW2, LLCA 19, LCA L1, etc.
9. Descriptions of effects on the HWNL are noted, but do not appear to follow the methodology and miss steps such as susceptibility.
10. Further it is unclear how *medium* landscape value has been reached, particularly as the criteria has not been listed within the methodology. Regarding the site as a whole, as opposed to each landscape receptor, it is our judgement that the landscape value is *high* for the following reasons:
 - a. Its relationship with the HWNL and wooded buffer to the BUAB of Horsham
 - b. Its historic landscape features, including veteran and near-veteran Oaks, hedgerow and field pattern
 - c. Its tranquillity to the north
 - d. Its distinct, sloping landform associated with the watercourse to the north
 - e. Its scenic, perceptual qualities, sense of place and dark skies, particularly to the northeast.
11. No criteria have been identified for Landscape Sensitivity, however combining judgements based on the above and susceptibility would result in a *medium high* sensitivity, taking into account areas of the site which indeed have scope to accommodate development.
12. Based on the given criteria for Significance of Landscape Effects it is our judgement that the development will give rise to a *substantial adverse* effect, as opposed to a *moderate adverse*, on account of major alteration to key attributes and very apparent deterioration to the contribution that the Site makes to the natural beauty of the HWNL.
13. Given the issues identified with the mitigation strategy, it is also not concurred with that these landscape effects will reduce after a 15 year period, given the permanent alteration of landscape features.
14. With regard to visual effects, while value and susceptibility have not been discussed, judgements on sensitivity are concurred with. However, once again there is lack of clarity on mitigation measures and how these are reflected within the landscape strategy, which are largely described as 'planting' throughout the report.
15. Where descriptions are more detailed relating to viewpoints, such as views from properties at Dickens Way, mitigation measures are not replicated in proposals; for example, 'New planting will help filter views across the brook'. For this area in the landscape strategy, wet meadow planting is proposed along the bankside with some scattered trees beyond the footpath and swales in proximity to proposed housing. Given the somewhat representative views detailed in photo location 7, it is unlikely that this planting will be sufficient to filter views of the development. A *substantial adverse* residual effect can therefore be concluded for this visual receptor.
16. It is unclear how proposals have been influenced by the LVIA. The layout and landscape strategy proposed is not deemed appropriate in mitigating identified adverse landscape and

visual effects and further design considerations must therefore be made in order to minimise erosion of the landscape character and setting of the HWNL.

Key Principles

17. In order to mitigate adverse effects on landscape character and visual amenity, and to comply with HDPF Policies 25, 26, 31 and 33 (6), existing vegetation must be protected, conserved and enhanced. This is also in line with Strategic Policy HOR1 'f'.
18. In order to safeguard the existing green infrastructure bounding the site, proposals must demonstrate compliance with BS 5837:2012 and as such, development within root protection areas (RPAs) should only be observed where unavoidable.
19. Where the areas of the site are undeveloped, we consider the layout can be adjusted to fully avoid RPAs, including SuDS features, noting that trees are highly susceptible to rapid decline due to sudden changes in their rooting medium, such as changes to hydrology, increased water levels or mounding.
20. Proposals set within undulating or sloping topography must be considered sensitively and must naturally assimilate within the receiving landscape without significant cut and fill. Dramatic changes in topography will be resisted as they may give rise to adverse effects on landscape character and visual amenity.
21. As per HOR1 'a', proposals must also have appropriate regard to the setting of the HWNL and the Grade II Listed Falcon Lodge Hillier Cottage. As such, they must meet the Objectives of the HWNL for its landscape and habitat qualities, which include:
 - a. *Protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.*
 - b. *Protect the historic pattern and character of settlements.*
 - c. *Protect landform and geological features.*
 - d. *Enhance and restore shaws and gill woodlands.*
 - e. *Preserve the dark skies of the HWNL by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from highways lighting.*

Layout & Landform

22. Further consideration to the layout, building heights and mitigation strategy must be made in order to comply with HDPF Policies 25, 26, 31 and 33 (6), HOR1, and the key principles listed above. To that effect, it is considered that the number of dwellings proposed will need to be reduced in order to do this successfully.
23. Key concern lies with the development's relationship with the HWNL; while the open space to the southeast is welcomed, built form has encroached into this area, and has additionally been pushed too close to Doomsday Ln in the northeast corner of the site. As such, the layout does not have appropriate regard to the setting of the HWNL. We request that this northeastern parcel is removed from proposals as shown in the markup plan below, allowing for an extension of open space and a more considered, sensitive design transition between the HWNL and the site. We further recommend incorporating generous woodland planting along the eastern boundary in order to extend the priority habitat and wooded buffer around the BUAB, thereby providing greater connectivity and minimising light spill, in line with HWNL objectives and actions.



24. While proposed for emergency, we are concerned the access may not be deemed appropriate within Doomsday Ln. Subject to the changes required to bring the existing field access to suitable standards, this could have an adverse impact on the setting of the National Landscape. Its removal or relocation is therefore recommended and/or clarification provided of the extent of the works required.
25. As per points 20 and 21c, proposals must also consider landform sensitively, particularly in proximity to the riverbanks of Horn Brook, as identified within Pre Application advice. In the absence of a levels or earthworks plan to demonstrate otherwise, we are not confident the development along the western and northern boundaries can be successfully assimilated within the receiving landscape. It is also noted within the DAS and LVIA that the river corridor will be widened, however it is not clear what exactly is being proposed and how this is achieved. In any case, we request that the natural landform is not altered in these areas (except if necessary in relation to the HOR1 'd' Riverside Walk) in order to conserve the historic landscape character that positively contributes to the HWNL setting and existing rural fringe.
26. Proposed and existing levels, contours and/or earthworks plans are thus recommended to be provided at this stage in order to address the concerns above. If significant cut and fill is required to deliver the proposed layout, it is requested that built form is pulled further inwards where landform is less sloping and that further riparian trees are proposed as part of a mitigation strategy, in line with HWNL objectives (20d). This will also assist in creating a more meaningful Riverside Walk.
27. A minimum 2m wide buffer is requested between existing dwellings along the southern boundary and the development. This should ideally be planted with species rich native hedgerow and managed to a height of 3m to provide screening and further amenity and ecological benefits. Maintenance access must also be detailed in plan.



Trees, Vegetation & other landscape features

28. As per point 17 and 21b in regard to HWNL objectives and actions of protecting and enhancing 'existing field patterns, including hedges', it is regrettable that historic hedgerows H3, H4 and H5 are to be partly removed and isolated. This is also raised by HDC's

Arboricultural Officer. In addition to requested layout changes, we believe there to be scope to retain more of H5, which can function as a boundary for the LEAP.

29. As above, further retention of H3 may indeed be possible if built form is pulled further away from the sloping landform. Nevertheless, it is noted as being 'replaced elsewhere on Site' within the provided documentation, however it is not detailed where this will be proposed. Please clarify.
30. While the central N-S green corridor has been retained, it must be widened in order to secure the longevity of historic T37 and T38, the RPAs of which are proposed to be encroached by SuDS proposals – see points 18 & 19. These trees are essential components of the receiving landscape and are regarded with key concern in addition to veteran T56.
31. We echo comments made by HDC's Arboricultural Officer regarding increasing the buffer of these trees and introducing post and rail fencing around their perimeters in order to limit footfall and risk of future lopping pressure. SuDS must be proposed outside of these buffers.
32. Given the relationship with the abutting HWNL, proposals must respect its setting and rural character, thus all streets are expected to be tree lined along with species and flower rich verges. As such, the site access must be the best example of this as a truly landscape-led approach to the development, in combination with the removal of the dwellings to the east of the access, as per point 23. This should be regarded as a key element to the scheme, thus amendments are required at this stage.
33. A 'long view corridor' to the spire of St Mary's Church is discussed within the LVIA, however based on the submitted illustrative masterplan, it doesn't appear that the viewing corridor can be achieved due to intervening built form and vegetation. We encourage further widening and that an illustrative image of the proposed view is submitted.
34. Is noted within the Preliminary Ecological Appraisal (PEA) that, 'new pond(s) will be created within the proposed development' however is it not clear where this is proposed. Ponds are a key characteristic of L1 - St Leonard's Forest Landscape Character Area (LCA) as defined by the Horsham District Landscape Character Assessment (2003), where the site is located. As such, this is strongly encouraged. More information is requested as to locations, earthworks and how permanent water levels will be achieved.

Open Space

35. The land budget plan and table identifying typology allocations under 6.2 of the DAS, as per the requirements of Horsham District Council's Open Space, Sports & Recreation Review 2021 (OSSR), is welcomed. However, we request that the allocations better reflect the descriptions of typologies as set out within the OSSR. These are repeated below for ease:
 - a. **Natural and Semi-Natural Greenspace**
Includes woodland (coniferous, deciduous, mixed) and scrub, grassland (e.g. down-land, meadow), heath or moor, wetlands (e.g. marsh, fen, wastelands (including disturbed ground)), and bare rock habitats (e.g. quarries) and commons. Such sites are often associated with providing wildlife conservation, biodiversity and environmental education and awareness.
 - b. **Amenity Greenspace**
Sites offering opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas. It includes informal recreation spaces, village greens and other incidental space.
 - c. **Parks and Gardens**
Covers urban parks and formal gardens (including designed landscapes), which provide accessible high-quality opportunities for informal recreation and community events
36. It is noted that, for example, the Amenity Space area allocated comprises predominately of tree, hedgerow and shrub planting, which should be categorised as Natural and Semi-Natural Greenspace. Similarly, the large Parks and Gardens area allocated comprises large areas of Natural and Semi-Natural Greenspace, including boundary scrub planting and veteran tree buffer.
37. Given that only half of the required Amenity Space is proposed to be delivered, and as above, that it is incorrectly categorised, we request that this provision be delivered within the allocated Parks and Gardens area. As per the OSSR, this must be:
 - a. A minimum size of 0.05 ha with a minimum dimension in length or breadth of 20m.

b. Suitable for informal recreation pursuits such as 'kickabout' football, picnicking, kite flying and dog walking.

38. In order to meet the definition for Parks and Gardens, further consideration to the design must be made in combination with high quality seating areas.

39. The under-delivery of allotments in lieu of financial contribution is deemed appropriate.

40. Buffer zones have not been identified, and while plans are illustrative, the requirement of a 20m buffer from the edge of the LEAP activity zone to the boundary of the nearest dwelling appears to not be adhered to. Please ensure compliance with this buffer is demonstrated.

41. In addition, please note the min size of a LEAP is 0.04ha, as opposed to the 0.02ha indicated within the DAS.

42. It is noted throughout the submitted information that proposals reflect the principles of the Make Space for Girls (MSFG) initiative, however this is not actually demonstrated within proposals. 'Play on the Way' and trim trail stations are proposed, however please review [HDC's Guide to inclusive spaces for young people](#) to follow the design hierarchy and quality checklist. For a development of this scale, opportunities for inclusive play and leisure, particularly sheltered and social seating, is expected. We recommend this is delivered in full, or in part, in proximity to the proposed bus stop.

RECOMMENDED CONDITIONS:

N/A at this stage.

NAME:

Elly Hazael
Trainee Landscape Architect (Planning)

DEPARTMENT:

Specialists Team - Strategic Planning

DATE:

04/06/2026

SIGNED OFF BY:

Inês Watson CMLI
Specialists Team Leader (Landscape Architect)

DATE:

16/06/2026