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LAND TO THE SOUTH WEST SIDE OF ROWHOOK HILL, ROWHOOK, WEST SUSSEX

Our Ref. 127/26/MS

RESPONSE TO CONSULTEE COMMENTS – LANDSCAPE

LPA REF. DC/26/0185

REGRADING OF LAND LEVELS TO FORM A HARDSTANDING AREA ASSOCIATED WITH HORTICULTURAL USE

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Appendix 1:

- Landscape and Visual Appraisal – prepared by Landscape Perspective Ltd
- Vehicle Tracking Plan and Considerations – prepared by Highway Planning Ltd.

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1.0 INTRODUCTION

1.1 D&M Planning Ltd have been instructed by the applicant (Mr James Lord) to prepare this detailed response to the comments raised in the email sent by planning officers dated 11th September 2026.

1.2 Within the email officers of the Council requested further information in response to the comments raised by the Council's Landscape Officer – a copy of this is held on the planning file. The Council stated:

- Council accept that the proposed use would relate to a horticultural enterprise which is acceptable in principle in the countryside
- Concerns raised regarding the scale and extent of the hardstanding, land regrading and earthworks
- Insufficient evidence provided to justify such works
- Concern that the works have introduced a large engineered and urbanising feature

1.3 So as to address these matters this note is accompanied by relevant supporting evidence including an LVA and Swept Path Analysis as well as a justification from the applicant.

1.4 At this juncture we consider it pertinent to highlight that as the Council have confirmed that the proposal would accord with one of the exceptions listed at S5 of the plan, then the LPA is duty bound to apply the universal tilt, supporting development unless the benefits are substantially outweighed by the adverse impacts.

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2.0 RESPONSE TO COMMENTS

2.1 The main purpose of this section of the statement is intended to provide a response to those matters set out above. The comments in this response being prepared in light of the Council's acceptance of both the business justification and in the knowledge that the proposal would comply with one of the exceptions listed at Policy S5 of the NPPF.

Evidence Concerning the Scale and Extent of Hard Surfacing

2.2 As is set out in Mr Lord's statement, the area of hard surfacing is intended to provide a yard for the Christmas Tree farm operation. The extent of the surfacing being informed by how Mr Lord envisages the operation being carried out and so as to allow for suitable turning of vehicles.

2.3 In considering these aspects there is a necessity to give regard to a variety of matters. These include:

- Nature of vehicles turning in site and any trailers or similar
- Proximity of the existing features on the site including workshop
- Operational requirements including areas for loading/unloading and nature of this (telehandlers)
- Storage needs
- Health and Safety including staff welfare and amenity provisions
- Topography of land

2.4 In light of such and as is demonstrated in the supporting documents, the area and extent of the hardsurfacing is justified from an operational perspective. Should such facilities not be provided then the site would not be able to suitably function with the Christmas Tree farm operation being prejudiced as a result of such; simply put, whilst trees could be grown on the land, they could not be distributed as no suitable provision would be made for such.

2.5 Based on these considerations we consider that sufficient justification has been made to the extent works, the location and the form. This position supports the compliance with Policy S5 in that the works are necessary for the horticulture business.

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Urbanising Form

2.6 This submission is accompanied by a detailed LVA which methodically works through the visual receptors, the baseline assessment, the current position and the impact once work is finalised.

2.7 The report suggests mitigation which ultimately if complied with leads to the conclusion reached that the scheme is acceptable in landscape terms. Much of this mitigation relates to the banks, and the current items on site both of which can be readily remedied without much delay.

2.8 It is our position that the mitigation can be controlled by way of a suitable worded condition. We would suggest that a condition similar in wording to that suggested in italics below is attached to any permission.

Within three months of this permission the applicant shall submit in writing to the Local Planning Authority a detailed scheme of landscape mitigation. The details shall have full regard to Landscape and Visual Appraisal (November 2026) and shall include timings, sequences of implementation, monitoring and management details. The development shall be carried out in accordance with the approved details.

2.9 We consider that the details submitted clearly demonstrate that subject to the appropriate wording this can be achieved in a suitable manner to ensure that the development ultimately respects the landscape character of the area. Through following such an approach, the apparent urbanising impact would be significantly reduced, addressing the concerns raised in correspondence.

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3.0 CONCLUSION

3.1 This statement relates to the retrospective application for regrading of land levels to form a hardstanding area associated with horticultural use, currently being determined under LPA reference DC/26/0185.

3.2 This statement has been prepared in response to the further comments made by the Council's officers; it provides justification and analysis for the development.

3.3 We consider it appropriate to reiterate that given the LPA have accepted that the proposal would amount to horticulture that the universal tilt set out in Policy S5 is engaged. In applying such a tilt, the LPA must determine whether the benefits are substantially outweighed by the adverse impacts.

3.4 As set out within this submission and those made previously, the development would include a number of benefits. Therese benefits include the contribution towards the rural economy, the contribution towards employment, the landscape benefits identified in the LVA etc. The adverse harms being minimised through appropriate mitigation as set out in the support statement.

3.5 Having regard to the above it is concluded that in applying the universal tilt required by S5 that the proposal should be approved.

3.6 We trust this information is of assistance to the determination of the case.

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