HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land To The South of Two Mile Ash Road Two Mile Ash Horsham West Sussex
DESCRIPTION:	Change of use of agricultural field to playing fields for football, including new access, car parking area with permeable surface and provision of compostable toilets
REFERENCE:	DC/25/0638
RE-CONSULT:	1st set of comments in black 2nd set of comments in blue 3rd set of comments in green
RECOMMENDATION:	Holding Objection / Advice Holding Objection Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

3rd set of comments

For avoidance of doubt, we wish to clarify that while a GLVIA 3 compliant LVA will inform and likely improve the proposed layout and mitigation measures, we remain unconvinced that the proposed location is suitable for the type of development proposed.

We are of the judgement that mitigation measures alone are unlikely to successfully assimilate the proposed development and its associated use into the landscape, primarily due to the site's open nature and sensitive location within the countryside.

The introduction of urbanising features to the open countryside location, as well as the removal of trees, is likely to have a significant adverse effect on the rural character of the local and wider landscape, contrary to HDPF Policy 25. Further, the proposed use is not essential to the countryside location, and it is disagreed that it can be considered 'quiet informal recreational use'. Our judgement is that the increase in overall level of activity in the countryside will detract from the tranquillity of the character of the area, also contrary to Policy 26 of the HDPF.

2nd set of comments

A landscape and visual appraisal (LVA) has not been submitted therefore our recommendation is unchanged. We note updated landscaping plans have been submitted indicating a newly proposed orchard, meadow and length of hedgerow, however this does not address concerns in regard to the removal of trees, HDPF policies 25 and 26, and the principal of change of use within the countryside location.

1st set of comments

The proposal and use are likely to result in adverse landscape character and visual effects and are not supported on landscape grounds. The introduction of urbanising features to the open, countryside location as well as the removal of trees is likely to have a significant adverse effect on the rural character of the local and wider landscape, contrary to HDPF Policy 25.

The proposed use is not essential to the countryside location and the increase in overall level of activity in the countryside will detract from the tranquillity of the character of the area, contrary to Policy 26 of the HDPF. Further, while the proposal is of a low profile and lighting is currently absent, there are concerns with the potential for incremental changes in future, which may include floodlighting to accommodate longer hours of use during winter months, ball stop fencing, and all weather 3G/4G pitch proposals, all of which will be difficult to resist once the principle of development on site is established. These will further exacerbate the eroding effect on the rural qualities of the character area.

If these conclusions are disagreed with, taking into account Policy 10 of the HDPF, a Landscape and Visual Appraisal (LVA) is required prior to determination to fully assess the effects of the proposal on the landscape character and visual amenity, and importantly to consider measures to mitigate any identified effects.

MAIN COMMENTS:

Site description & context

1. The proposed development site is located outside of the defined Built-Up Area Boundary (BUAB), in a countryside location. It comprises an undeveloped, grassed field, bounded by hedgerow on all sides.
2. The eastern boundary is defined by a mature treeline that extends further south alongside Marlpost Road, significantly contributing to the rural character of the area. An additional, although less dense, tree line can be found along the northeastern boundary.
3. The site and its immediate context hold predominately rural and agricultural qualities, on account of the undeveloped fields and agricultural features, including the presence of farm buildings to the southwest. A few dwellings can be found to the north of the field, notably including the locally listed Bax Castle. While these dwellings introduce some urbanising features, they are characteristic of country houses set within large grounds. Due to the intervening layers of mature vegetation and, in the case of Bax Castle, the influence of local topography, these features are not perceived as significant intrusions on the countryside setting.
4. The wider character shares the same characteristics as the immediate context described above, comprising a well-defined field pattern, traditional agricultural features and scattered farm buildings. This setting is punctuated by parcels of Ancient Woodland, including Courtland Wood, which can be found to the north-east. Urbanising influences are minor, limited primarily to the few dwellings previously noted.
5. The closest settlement is the village of Southwater, situated to the east beyond multiple undeveloped, agricultural fields. The presence of future development to the east of Southwater, as indicated by the allocation in the Southwater Neighbourhood Plan (SNP2), should however be noted, as it is anticipated to change the landscape character baseline conditions with the introduction of built form and urbanising features within the countryside setting, detracting from the current rural character.
6. Multiple public rights of way (PRoW) are located in the surrounding area, providing access and enjoyment of the countryside to sensitive receptors. These include the following:
    a) PRoW 1648 to the south of the site, running east
    b) PRoW 1647 south-west of the site, running in a northwest direction

c) PRoW 1650 beginning adjacent to the northern boundary and running north-east
d) PRoW 3568 (also known as the South Downs Link) to the north of the site, running north-west to south-east
e) PRoW 1655 connecting to the South Downs Link from Bonfire Hill, in proximity to Southwater.

7. Views into the site from the footpath network are limited due to intervening vegetation and local topography. However, mid to long distance views that include the proposed site entrance are possible from PRoW 1655.
8. Expansive views into the site and towards the South Downs are available from Two Mile Ash Road and Marlpost Road, both of which the site abuts. While these views are only afforded low-moderate value due to their transient nature, they are nonetheless experienced by receptors travelling through the verdant countryside and contribute to the rural qualities of the area and perception of the site within its broader rural context.
9. Proposed access is via Marlpost Rd, a narrow, verdant road characterised by a dense tree line as noted under point 2. To facilitate the new access, the removal of four trees and an additional 2m canopy clearance is proposed. This is likely to result in an adverse effect to the local character of the area.

Landscape Character

10. The proposed site falls within H1 - Southwater and Christ's Hospital Landscape Character Area (LCA) as defined in the Horsham District Landscape Character Assessment (2003).
11. The site and the surrounding contextual landscape are deemed representative of the local landscape character area, exhibiting many of the key characteristics identified, including: *largely open character; low ridge and plateau*; *relatively few woodlands and hedgerows;* and *extensive open views*.
12. Relevant key issues include: *pressure for urban development*; *loss of hedgerows*; *increasing traffic*; and *potential pressure for housing and other development at Southwater*.
13. Overall sensitivity to change is moderate, with key sensitivities to: *small scale incremental change* and *further decline in traditional land management*.
14. Relevant Planning and Land Management Guidelines state to: *conserve existing hedgerows and field trees*.

Assessment

15. HDPF Policy 26 is a strategic policy that safeguards the rural character and undeveloped nature of the countryside. Development is only acceptable if it is essential to the countryside location and serves a clearly defined rural function. It must also avoid increasing activity levels in the countryside and protect, conserve or enhance key landscape features and characteristics, including its tranquility.
16. The proposals are contrary to Policy 26 as they are not essential to the countryside location, and do not meet the criteria for defined rural functions. Further, the proposed use is likely to lead to an increase of the overall level of activity in the countryside, thereby diminishing the tranquillity, sense of place and rural qualities experienced within the area. Additionally, the proposed felling of trees to facilitate access, along with the introduction of urbanising detractors such as hard landscape, car parking and toilet facilities, is likely to give rise to localised adverse effects on key features and characteristics of the landscape character area.
17. HDPF Policy 25 is a strategic policy that seeks to safeguard the natural environment and landscape character, including landform, development pattern and designated habitats, from inappropriate development. Proposals must protect, conserve and enhance landscape and townscape character, maintain and improve the green infrastructure network and safeguard biodiversity sites ensuring no net loss.

18. The scheme fails to comply with Policy 25 as it does not protect, conserve or enhance landscape character considering the loss of the existing tree belt, thereby considerably weakening the green infrastructure network, as well as the loss of the undeveloped open character of the site, representative of the landscape character area.
19. HDPF Policy 33 is a strategic policy that seeks to conserve and enhance the natural and built environment, with part 6 pertaining to the retention of existing important landscape and natural features, such as trees, hedges, banks and watercourses, as well as development needing to relate sympathetically to the local landscape.
20. Proposals are considered to contravene Policy 33 (6) as the partial loss of the mature tree line along Marlpost Rd is not adequately mitigated by the tree planting proposed within the scheme. This established vegetation significantly contributes to the character and visual qualities of the area.
21. In the absence of an LVA to demonstrate otherwise, it is our professional judgement that the proposals would have an eroding effect on the landscape character as result of the partial removal of the mature treeline, alteration of the site's undeveloped open character, and the introduction of urbanising features such as the car park and noise associated with the proposed use, all of which are inconsistent with the countryside setting. Proposals are also likely to give rise to adverse effects on the visual amenity of receptors on Marlpost Rd and Two Mile Ash Road and the footpath network.
22. While not indicated as part of the current proposals, we are also cognisant of the potential for external lighting to be sought in the future, given the proposed hours of use during winter months. Additionally, based on experience with similar sports pitch developments, it is likely that future applications may include seeking permission for the installation of ball stop fencing. These elements would introduce further urbanising features, resulting in further adverse effects on landscape character and visual amenity, to the detriment of the rural qualities experienced within the local landscape. Notwithstanding the identified adverse effects, once the change of use is established, these elements may prove difficult to resist.
23. Proposals must also be considered in tandem with Land West of Southwater (SNP2) as identified within the Southwater Neighbourhood Plan Policies Map. As a result of the increased development and built form, the requirement to protect, conserve and enhance the countryside is all the more pertinent. This location, where views are available from the footpath network and the wider landscape, is considered more sensitive to change and key to retaining the rural qualities of the area and future settlement setting.

<u>Considerations</u>

24. We do not concur with the assessment made within the AIA in regard to the removal of T4, T5, T6 and T7 having a positive improvement to landscape. These trees contribute to a mature treeline and green corridor and are thus valued as an important landscape feature. Their removal will create a large opening, exacerbated further by the lifting of the Field Maple's (T8) canopy, and will expose the proposals to view from Marlpost Rd and PRoW 1655.
25. We see little benefit in the part loss and weakening of this established landscape feature and its retention is required. As such, if the principle of change of use is considered acceptable on other planning considerations, proposals must consider alternative access routes that do not result in the removal of existing trees.
26. Landscape mitigation should aim to conserve the open nature of the immediate site and wider character area, using trees to screen urbanising features as opposed to extensive, open views.
27. While not required at this stage, please note that the clay rich soil profile typically found within the character area and district causes impeded drainage, therefore all football pitches must be constructed with suitable drainage in order to minimise the need for costly maintenance and interventions at a later stage.

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.	
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