

Town & Country Planning Act 1990 S78

LANDSCAPE STATEMENT

of

John-Paul Friend

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on

Landscape and Visual Matters

on behalf of

Hunter Group

in respect of

Eastlands Lane, Cowfold

LPA Ref: DC/26/0472

LVIA Ltd Ref: HG1714ls

Date: June 2026



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Landscape Statement	
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1.0 Introduction

Witness

- 1.1.1 I am John-Paul Friend. I am the Director of LVIA Ltd and I specialise in landscape and visual and Green Belt planning issues associated with development and change.
- 1.1.2 I have provided evidence for planning appeals by inquiry, written representations and hearing for over nine years.

Qualifications

- 1.1.3 I hold a BA (Hons) degree in Landscape Architecture and Post Graduate Diploma in Landscape Architecture from the University of Gloucestershire. I am a chartered member of the Landscape Institute.

Professional Practice

- 1.1.4 I am the Director of LVIA Ltd and I have been practising landscape architecture for 19 years, all in private practice as a Landscape Architect.
- 1.1.5 I am an associate lecturer at the University of Gloucestershire and University of the West of England, where I teach undergraduate and postgraduate landscape architecture and planning students. I serve on the Landscape Institute's Advisory Council, contributing to sector-wide policy, professional standards and strategic direction. I am also a member of the GLVIA Panel, providing specialist input on the interpretation and development of landscape and visual impact assessment guidance.
- 1.1.6 I have an active involvement in schemes across the United Kingdom. The range of projects in which I have been involved include residential, agricultural, defence, highways and energy. I am also involved in the production of environmental impact assessment, environmental statements, Green Belt analysis and general landscape design. During my professional career I have carried out a substantial number of Landscape and Visual Impact Assessments, Townscape Assessments, Landscape Appraisals and Character Assessments on a wide variety of sites and areas.
- 1.1.7 LVIA Ltd carries out impact assessments, masterplanning, landscape evaluations and detailed landscape proposals for a wide variety of clients. I liaise with local authority officers in many local planning authorities (London boroughs, district and borough Councils) across Britain; and a high proportion of my practice's activity is solely on site evaluation and landscape design.
- 1.1.8 I am familiar with the Application Site and its surroundings, having reviewed all relevant background information and undertaken field surveys.

Declaration of Truth

- 1.1.9 I declare that the evidence which I have prepared and provide for this appeal is true. It has been prepared and is given in accordance with the guidance of the Landscape Institute and I confirm that the opinions expressed are my true and professional opinions.
- 1.1.10 The scope of my Statement is to deal with the landscape and visual impact issues associated with the site.

Project Involvement

- 1.1.11 LVIA Ltd were appointed to prepare a landscape and visual impact assessment (LVIA) in respect of the proposed residential scale development located at Eastlands Lane, Cowfold.

2.0 Reasons for Refusal (RfR)

2.1.1 The Council refused the application for two reasons, both which relates partly to landscape and visual matters (text emboldened for ease of reference):

1. The development would be located beyond a defined built-up area on a site not allocated within the Development Plan and would not be essential to this countryside location. The development would therefore be contrary to the overarching spatial strategy and hierarchy approach of concentrating development within defined settlements and advocating a planned approach to settlement expansion, contrary to policies 1, 2, 3 and 26 of the Horsham District Planning Framework (2015) and policies 9 and 10 of the Cowfold Neighbourhood Plan 2019-2031. Notwithstanding the absence of a five-year land housing supply, and the provisions of the National Planning Policy Framework (2024) at paragraph 11(d), it is not considered that there are any material considerations which would outweigh harm arising from conflict with the above policies.

2. The development entails a quantum of built form that would formalise and suburbanise the site, resulting in the dilution and erosion of the informal character of the landscape and countryside setting. The proposal would result in a prominent form of development that would fail to preserve and/or enhance the landscape characteristics of the area. The proposed development would therefore be contrary to Policies 25, 32, and 33 of the Horsham District Planning Framework (2015) and Policy 9 of the Cowfold Neighbourhood Plan 2019-2031.

2.1.2 The Council's conclusion that the proposal would "formalise and suburbanise" the site is not supported by the landscape baseline. The LVIA identifies the site as comprising two parcels of grassland enclosed by hedgerows, mature trees and woodland, with existing residential development directly next to the site. The western parcel is influenced by Eastlands Wood, which provides a high degree of enclosure and containment. The eastern parcel is framed by mature vegetation and neighbouring dwellings. The site is therefore not experienced as part of an expansive or open rural landscape; rather, it forms part of a transitional settlement-edge environment where domestic influences are already present.

2.1.3 The Council asserts that the proposal would result in a "prominent" and "urbanising" form of development. This is not supported by the LVIA, which concludes that the site has medium landscape sensitivity and would experience a medium magnitude of change, resulting in moderate adverse effects at worst. The LVIA further confirms that, following mitigation and vegetation establishment, residual effects would reduce to minor overall, with no material change to the wider landscape character. The LPA provides no evidence to contradict these findings.

2.1.4 The Council also claims that the LVIA methodology is "not compliant" with GLVIA3, yet it does not identify a single methodological error, nor does it reference any paragraph of GLVIA3 allegedly breached. Instead, the LPA proceeds to undertake its own assessment using the same sensitivity–magnitude–significance framework it claims is incorrect. This inconsistency undermines the credibility of the LPA's critique. The LVIA follows GLVIA3 and the structure of the assessment demonstrates adherence to recognised best practice.

2.1.5 The LPA's reasoning appears to conflate the presence of change with the presence of harm. GLVIA3 is explicit that landscape change is not inherently adverse. The proposal reflects the scale and grain of existing development along Eastlands Lane and can be accommodated within the existing settlement-edge context without material harm to landscape character or visual amenity.

3.0 The Proposed Site: Local Context and Character

- 3.1.1 The application site comprises two small fields located along Eastlands Lane. The western field is bounded by Eastlands Wood, a mature woodland designated as Priority Habitat and protected by TPO 1520. The woodland provides strong enclosure and limits views into the site from the west and northwest. The eastern field is bounded by hedgerows, mature trees and a pond to the east, with existing dwellings to the north and south. The landform is gently undulating, consistent with the local landscape.



Image 1: Illustrating the site and its settlement fringe context on aerial photograph

- 3.1.2 The local landscape is characterised by relatively small fields, woodland blocks, hedgerows and dwellings. The presence of existing residential properties to the north and south of the eastern parcel, and the proximity of Eastlands Farm and associated buildings, mean that the site is already influenced by domestic and semi-rural features. The site does not form part of a large, uninterrupted tract of countryside; rather, it sits within a semi-enclosed, transitional landscape where settlement and vegetation structure combine to limit long-distance visibility.
- 3.1.3 The LPA's description of the site as "open" and forming part of a wider rural landscape is not supported by field evidence. The strongest perceptual qualities are enclosure, containment and the influence of adjacent built form. The site is not publicly accessible, and views from public rights of way are filtered or screened by vegetation, particularly along PRoW COW-1780 and COW-1779. The landscape baseline therefore does not support the LPA's assertion that the site plays a significant role in maintaining rural openness or tranquillity.

4.0 Effects of the Proposed Development

- 4.1.1 This chapter details the assessed findings of the submitted LVIA that offers analysis of the character of the landscape at national and sub-national level, and the extent to which the appeal site shares the recognised characteristics of the wider landscape and change that would occur to the visual baseline.
- 4.1.2 It should be noted that the characterisation process is a non-value judgement process; classifying landscapes into distinct areas does not suggest that one character is more sensitive than another or valued by people more or less.

4.2 Effects of the Proposed Development on Landscape Character

- 4.2.1 The LVIA identifies the site overall as having medium sensitivity, reflecting its semi-enclosed nature, the presence of woodland and hedgerows, and the influence of adjacent dwellings. The magnitude of change is assessed as medium during construction and operation, reducing to small at Year 15 following establishment of mitigation. The resulting effects are moderate adverse initially, reducing to minor overall at the residual stage.
- 4.2.2 The Council's assertion that the proposal would "urbanise" the landscape is not supported by the evidence. The development is modest in scale, reflects the existing pattern of dwellings along Eastlands Lane, and is contained within a well-vegetated envelope. The proposal does not extend built form into open countryside, does not break the skyline, and does not alter the underlying landscape structure. The woodland edge, hedgerows and mature trees remain the dominant landscape features, and the proposal includes additional planting to reinforce these elements.
- 4.2.3 The LPA's claim that the development would erode the "informal character" of the landscape is based on an assumption that the site currently contributes to a wider open rural setting. This is contradicted by the LVIA, which demonstrates that the site is visually contained and already influenced by settlement. The proposal can be accommodated without material harm to the key characteristics of the Cowfold and Shermanbury Farmlands landscape character area.

Landscape Value

- 4.2.4 In the High Court judgement handed down on the 15th November 2023 the judge made clear the distinction in respect of NPPF paragraph 187 and the sub paragraphs (a) and (b). Valued Landscapes are to be 'protected' and 'enhance' whereas other countryside is to be 'recognised' for its intrinsic character and beauty. 'Recognising' has some level of protection, however the level of protection afforded to valued landscapes is plainly higher.
- 4.2.5 All landscapes have some value to one or more communities for one or more of its assets, having value and being valued are different concepts. Local value is at the lower end of the spectrum, with National Parks and AONBs being at the highest end of the spectrum.
- 4.2.6 At no time has the Council asserted that the Appeal Site is located in an NPPF Valued Landscape. The appeal therefore does not need to consider paragraph 187(a).

4.3 Visual Effects of the Proposed Development

- 4.3.1 The LVIA identifies that the geographic extent of perceptible visual change is very limited to the site and its immediate surroundings. Outside this area, the development would not be visible due to the strong vegetation structure. Within the limited area where views are available, such as along short sections of PRoW 1777 and 1775, the change would be perceptible but not

dominant. The LVIA concludes that visual effects would be moderate adverse initially, reducing to moderate or minor at Year 15.

- 4.3.2 The Council's claim of "major adverse" visual effects is not supported by any visual evidence. The LPA provides no photographs, no wireframes, no photomontages and no ZTV analysis. The LVIA, by contrast, provides a structured assessment of receptor sensitivity, magnitude of change and significance of effect. The LPA's conclusions are therefore unsubstantiated.
- 4.3.3 The Appeal Scheme will not be consistently visible from the wider landscape; with views glimpsed through vegetation from footpath COW-1780. From some locations parts of the new development will be visible rather than the entirety of the built form. Overtime the visibility of the Appeal Scheme will be reduced by the maturation of new planting. The most open views where the Appeal Scheme will be most in evidence are from footpath COW-1777 on Eastlands Lane.
- 4.3.4 From the wider area the Appeal Site comprise a relatively small component of views and the visual experience, the change will not noticeably alter this situation.
- 4.3.5 In the existing views, housing is visible as the backdrop to the most open views. Views of the housing are filtered by vegetation that sits in the foreground; this visual composition will be replicated by the Appeal Scheme.
- 4.3.6 The Appeal Scheme will not be inconsistent with the general character and composition of views, nor will it block or obscure valued views or views of important landmarks in views from the wider landscape.
- 4.3.7 The proposal does not introduce incongruous elements, does not alter key views, and does not materially change the way the landscape is experienced. The retained woodland and hedgerows, combined with proposed planting, ensure that the development will remain visually recessive within the landscape. The extent of visual change is very geographically limited.

4.4 Conclusion

- 4.4.1 It is my professional judgement that the Appeal Scheme is acceptable. It delivers elements and features which are consistent with the components of the landscape and settlement in and around Cowfold. Furthermore, it is located in a landscape which is not protected by any national, regional, or local designations.
- 4.4.2 The fact that the nearby Eastlands Wood has been designated as a Local Green Space demonstrates that the Neighbourhood Plan process was capable of identifying and protecting land considered locally important. If the application site had been regarded as contributing to the same qualities of openness, recreational value or local significance, it could reasonably have been included within that designation. Its omission indicates that the site was not considered to possess the characteristics warranting Local Green Space protection.

5.0 Conclusion

- 5.1.1 The landscape and visual reasoning that underpins the Council's refusal is not supported by the evidence. The submitted LVIA demonstrates that the site forms a semi-enclosed settlement-edge parcel, already influenced by neighbouring residential development and defined by a strong vegetation structure that limits wider visibility. Within this context, the proposed development reflects the prevailing scale, pattern and grain of existing dwellings along Eastlands Lane. As a result, the scheme can be accommodated without giving rise to material harm to either landscape character or visual amenity.
- 5.1.2 The Council's critique of the LVIA methodology is neither substantiated nor coherent. No specific methodological errors are identified, and the LPA does not reference any part of GLVIA3 that it considers to have been breached. Instead, the Council relies upon the very same sensitivity–magnitude–significance framework it claims was incorrectly applied. This internal inconsistency highlights that the Council's conclusions are based on generalised assertions rather than a structured or evidence-led analysis.
- 5.1.3 The LVIA provides a clear and robust assessment which concludes that landscape effects would be moderate adverse at the outset, reducing to minor at the residual stage following mitigation and vegetation establishment. Visual effects are similarly limited and would not be material in landscape terms. The proposal does not formalise or suburbanise the landscape, nor does it erode rural character or introduce a form of development that would appear prominent or harmful within its setting.
- 5.1.4 The landscape and visual effects arising from the scheme are largely confined to the site itself, with the existing boundary vegetation providing both physical and visual containment. The most noticeable change occurs in close-range views immediately adjacent to the site boundaries. Beyond this limited area, the degree of perceptible change is minimal, and the wider landscape and visual receptors would experience little to no alteration in their baseline conditions.
- 5.1.5 It is important to recognise that the presence of change is not, in itself, a justification for refusing planning permission. Development on greenfield land inevitably alters landscape character and visual amenity to some degree, yet this does not preclude the acceptability of such proposals. From a landscape planning perspective, the relevant question is whether the change would give rise to undue or significant effects. In this case, the evidence demonstrates that it would not.
- 5.1.6 In my professional opinion, the appeal scheme responds appropriately to its context. It incorporates accessible greenspace, introduces dwellings of a scale and form consistent with the existing settlement pattern, and reflects the grain and character that prevail along Eastlands Lane. The development is neither excessive nor disproportionate and sits comfortably within the established landscape framework.
- 5.1.7 For these reasons, the landscape aspects of the Council's refusal are not substantiated and do not provide a sound basis for resisting the appeal proposal.

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