



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land at 521816 122277 Eastlands Lane Cowfold West Sussex
DESCRIPTION:	Erection of 9no. dwellings with associated car parking spaces, detached carports, garages and landscaping.
REFERENCE:	DC/26/0472
RECOMMENDATION:	Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

In principle, the proposed development is not essential to its countryside location and is contrary to HDPF Policies 25, 26, 31 and 33. The proposed site is isolated from and unrelated to the built form of Cowfold and does not adjoin the existing settlement edge, resulting in an unnatural extension beyond the defensible boundary of Eastlands Wood. While some development can be experienced in the vicinity, these dwellings are modest and in keeping with the rural character.

The intensification of domestic and urbanising features along with associated light pollution is incongruous with the historic landscape features and priority habitat. Further, it is likely to detract from the rural and agricultural character and views experienced from public rights of way. The increase of activity generated by proposals will additionally detract from the tranquillity and sense of place of the rural countryside setting, over and above that experienced with existing dwellings.

As a result, the proposals are likely to give rise to major adverse residual landscape character and visual effects given the site's rural character and degree of visibility.

Please see details below.

MAIN COMMENTS:

Site description & context

1. The proposed site is located outside of the Built-Up Area Boundary (BUAB) of Cowfold, in a countryside location. It comprises two parcels of undeveloped fields.
2. The western parcel is bounded by Eastlands Wood to the west and north; described as 'ancient' within the Planning Statement, Eastlands Wood is found in historic maps dating to the 1830s-1880s and is noted to possess multiple Ancient Woodland indicator species. It is designated as Priority Habitat by Natural England, as Local Green Space (LGS) within Cowfold Neighbourhood Plan (Sep 2025) (CNP), and afforded protection under Tree Protection Order (TPO) 1520. The southern boundary is undefined.
3. The eastern parcel is bounded to the north by scattered dwellings, to the east by a pond bounded by mature trees, and to the south by various barn style dwellings part of the Eastlands Farm complex. Eastlands Farm itself is a Grade II listed building; a designated heritage asset that can be seen in context with the development and that forms part of its immediate setting.

4. Both parcels connect in the middle by an un-named track and are visually open to the surrounding local landscape.
5. Site access is proposed off Eastlands Lane/public right of way (PRoW) 1775/PRoW 1777. This lane noted within the Planning Statement as having, 'quiet, rural character' and highlighted within the CNP as having potential for 'Quiet Lane' designation in order to encourage safer use of the shared space between pedestrians, cyclists, horse riders and vehicles. Various mature oaks with TPOs line Eastlands Ln, the root protection areas (RPAs) of which proposed to be encroached by proposals to introduce pedestrian refuge points, as per the Transport Statement.
6. The site and its immediate context hold strong rural and agricultural qualities on account of its predominately undeveloped nature, landscape features and woodland setting. It is notably quiet and tranquil, positively contributing to its rural character. While the dwellings situated to the north and south of the eastern parcel introduce some urbanising features, they are predominately characteristic of country and farmhouses set within large grounds. Their vegetated frontages, particularly related to the northern dwellings, result in these features not being perceived as significant intrusions on the countryside setting.
7. The wider character is mixed in nature. Urbanising detractors comprise the village of Cowfold to the west and a sewage works to the south-west. However, intrinsically rural farmland can be found to the east and south, and further north and west of Cowfold itself, punctuated by parcels of woodland, hedgerow and treelines.
8. Multiple PRoWs are located in the surrounding area, providing access and enjoyment of the countryside to sensitive receptors. Those that offer expansive views into the site include:
 - a. PRoW 1775 along Eastlands Ln, running west-east
 - b. PRoW 1777 along Eastlands Ln and through Eastlands Wood, running southeast-northwest
 - c. PRoW 1779 alongside Eastlands Wood, running southwest-northeast, offering partial and filtered views
9. Views into the site from the footpath network are widely available and experienced by sensitive receptors within the countryside, who currently enjoy the surrounding rural and agricultural landscape. The site's undeveloped nature therefore positively contributes to the enjoyment of the countryside.

Landscape Character & Capacity

10. At a local level, the proposed site falls within J3 – Cowfold and Shermanbury Farmlands Landscape Character Area (LCA) as defined by the Horsham District Landscape Character Assessment (2003).
11. The site and the surrounding contextual landscape are deemed representative of the local LCA, described as having a generally '*undeveloped rural character*', and exhibits many of the key characteristics including: *scattered small woodlands; small and medium size pasture fields and some larger arable fields; localised areas with more open character; field ponds; and small farmsteads and cottages dispersed along lanes and tracks*.
12. Relevant Planning and Land Management Guidelines state to:
 - a. *Conserve the rural undeveloped character. Any large scale housing and commercial development would be likely to damage character.*
 - b. *Ensure any appropriate development responds to historic settlement patterns and local design and building materials.*
 - c. *Conserve and enhance existing network of hedgerows and shaws.*
 - d. *Maintain the pattern of small scale pastures.*
 - e. *Encourage the natural regeneration of hedgerow oaks and or plant new ones.*
 - f. *Encourage establishment of small woodlands.*
13. The Horsham District Landscape Capacity Assessment (2021) locates the proposed site within Local Landscape Character Area (LLCA) CF5: Cowfold. The study highlights relevant landscape and visual features such as the, '*positive contribution of Eastlands Wood to the village setting*', '*open views towards countryside to the south*' and historic features such as, '*historic farmstead, woodland and medieval and post medieval fieldscapes*'.
14. The study identifies that the high combined landscape sensitivity together with the moderate landscape value gives the area a *no/low* capacity for housing development.
15. It concludes that, '*Any development could easily be perceived as an incursion into open countryside unrelated to the current natural defensible settlement boundary of Eastland's woods*'.

LVA

16. The LVIA provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020). It is not found to be compliant, however it is considered to be proportionate to the proposed development.
17. Key parts of the assessment have been missed or carried out incorrectly and findings are thus not concurred with. For example, landscape sensitivity should be informed by combining judgements of the value attached to the landscape - itself informed by condition - with its susceptibility to the type of change or development proposed. However, this report interchanges sensitivity and susceptibility, and further assesses 'landscape visual sensitivity' (see criteria under Table 4) as opposed to sensitivity as described above.
18. The study fails to assess the eastern and western parcels separately. These parcels have differing contexts and landscape features, thus should be assessed individually.
19. In any case, the site assessment is not thorough and the landscape receptors identified are not comprehensive enough. In addition to 'vegetation pattern', 'overall character of site and context' and the individual site parcels, we would expect to see descriptions of effects on all character guidance including the LLCA CF5 and individual features such as Eastlands Wood, trees including the veteran Oak on Eastlands Ln, landform/field pattern, and perceptual and aesthetic features.
20. We respectively disagree that the existing urbanising influences are detrimental to the intrinsic rural character experienced on site; no noise from the A272 is experienced and the low-density farmsteads are congruous with the rural, agricultural character.
21. We also disagree that proposals would not impact the adjacent woodland or amenity value of the footpath route; the former via introduction of lighting and other likely indirect impacts associated with surrounding the woodland with development, and the latter via permanently altering open views and the introduction of many urbanising elements, including a large, dry SuDS basin which has not been identified in the assessment.
22. Despite being included in the assessment criteria, landscape quality or condition has not been assessed. We believe this to be *very high* across both parcels on account of all landscape elements being intact and buildings in local vernacular.
23. There is no description of proposals, thus it is assumed that these match the description within the planning statement. Nevertheless, it is our judgement that susceptibility to change is *high* for the western parcel, given the sense of remoteness, scale and enclosure and limited manmade elements, and *medium* for the eastern parcel.
24. As per point 17, it is unclear how medium landscape sensitivity has been reached. In any case, based on the given criteria of 'landscape visual sensitivity', it is our judgement that the western parcel has a *high* sensitivity on account of it not quite meeting 'very high', but exceeding 'medium' indicators of visual interruption and nature of views, and *medium* sensitivity on the eastern parcel.
25. It is also unclear how 'magnitude of landscape impacts', or Magnitude of Landscape Effects as per GLVIA 3, has been reached. Based on the given criteria, this is deemed to be *large* for the western parcel as a result of proposals being totally uncharacteristic when set within the receiving landscape and *medium* for the western parcel. This leads to an overall conclusion of *major adverse* landscape effects on the western parcel and *moderate adverse* landscape effects on the eastern parcel, as opposed to solely moderate adverse.
26. With regards visual receptors we are in agreement that these receptors have a high sensitivity to change. However, given the prominent change in the existing views and the ease of which this would be noticed, viewpoints 1 and 2 should be concluded as having a *high* magnitude of change as opposed to *medium*. Further, viewpoint 3 should be concluded as *medium* magnitude of change as opposed to *small*, as while only partial views are afforded, the introduction of domestic and urbanising features in proximity would result in a distinct and noticeable change in the view.
27. Scale of visual effect is assumed to be 'significance of visual effect' as per table 11. As above, we conclude that as a combined judgement of the above magnitude judgements and of receptor sensitivity, this results in *major adverse* visual effects for viewpoints 1 and 2, and major/moderate for viewpoint 3. Viewpoints 4-7 are agreed with and not considered significant.
28. It is unclear how proposals have been influenced by the LVIA and there are concerns with the effectiveness of the proposed mitigation measures. The following mitigation measures are noted in the report:

- a. *'Protection of existing boundary vegetation'* is regarded as a requirement for any development and is not considered a mitigation measure.
 - b. *'Heights of the built form is to be kept to a similar or lower ridge height than the nearby development'* It is unclear which development is being referred to, however the proposed ridge heights appear to be much taller than that found in the surrounding, scattered farmsteads. Therefore, to be successful, this measure must be reviewed against the immediate context.
 - c. *'The proposed dwellings will be situated close to the location of the existing built form'* this is relevant to the eastern parcel, but not to the western parcel which is not associated with any other built form.
 - d. *'Ensure that sufficient space is reserved for compensatory planting'* this is assumed to refer to introducing planting within the layout to soften and integrate the development as opposed to compensating for the loss of removed trees. In any case the mitigation planting strategy must be clearly shown within the proposed plans in order to assess their effectiveness.
 - e. *'The proposed built elements will be situated close to existing built form of a similar nature'* This is considered repetition of point 29c.
 - f. *'Built form will be kept back from the site's southern boundary to allow for...visual barrier elements'* This is considered repetition of point 29d. In any case, there is no room along the southern boundary of the eastern parcel.
 - g. *'Additional trees and native hedgerow species will be planted along the field boundaries'* This is considered repetition of point 29d and is not represented in plan.
 - h. *'Creation of wildflower grassland'* is not considered appropriate mitigation and is not represented in plan.
29. Given the lack of clarity on these mitigation measures, they cannot be deemed appropriate in mitigating identified adverse landscape and visual effects. In any case, attempting to screen views from PRoW-1777 via a single line of trees, as indicated in the proposed site plan, will result in the open, middle distance views experienced being prominently changed, giving rise to major adverse residual visual effects. Further design considerations must thus be made in order to minimise erosion of the landscape character.
30. Therefore it is not concurred with that the major adverse landscape effects will reduce after a 15 year period, given the permanent alteration of landscape features in combination with the unsound mitigation strategy.

Assessment

31. From a landscape perspective, the proposals fail to comply with the following relevant policies:
- a. HDPF 25; the proposals do not protect, conserve or enhance landscape character as a result of the introduction of domestic and urbanising features, loss of undeveloped character, and weakening of the green infrastructure network on account of access proposals and other urbanising features associated with the development.
 - b. HDPF 26; the proposals are not essential to the countryside location, and do not meet the criteria for defined rural functions. The introduction of urbanising detractors such as expansive hard landscape, garages, cars, estate railing, built form and associated light pollution, is likely to give rise to localised adverse effects on key features and characteristics of the landscape character area - Eastland Woods in particular. Further, the proposed use will lead to an increase of the overall level of activity in the countryside; the resulting car use and traffic over and above current levels is incongruous with the tranquil surrounds.
 - c. HDPF 31 & 33; the proposals do not relate sympathetically to the local landscape and currently to not demonstrate that features afforded TPOs, such as Eastland Woods, the veteran Oak and the trees along Eastland Ln, will not be deteriorated or lost.
 - d. CNP Policy 3; the proposed site, while not within the LGS, is adjacent to it, thus the introduction of residential built form is not ancillary to its use.
32. The proposals do not demonstrate compliance with CNP strategic objectives as they do not maintain distinctive views or visual connectivity with the surrounding countryside. Further, they do not relate to the BUAB or historic settlement pattern, thus contributing to urban sprawl.
33. As above, the mitigation measures suggested within the LVIA are not appropriate and do not appear to have influenced proposals in a meaningful way. It is thus our judgement that development will give rise to major adverse landscape and visual effects.

34. No concerns are raised regarding the principle of shared access on Eastlands Ln, however the effects of development to the mature and protected trees are unclear due to the lack of detailed locations for the proposed refuge points. Nevertheless, some refuge points may be able to be delivered without encroaching RPAs.
35. Proposals must further clearly demonstrate the protection of the veteran Oak on the southeastern corner of Eastlands Ln from future pruning pressure and increased indirect effects from development, construction and increased activity, such as lighting, pollution and vibration.
36. As above, proposals must also clearly demonstrate the protection of Eastlands Wood, noting that the 15m buffer falls within both communal and residential space and is thus not appropriately protected from direct and indirect effects of development and proposed use. The layout must be amended to ensure the buffer falls outside of residential curtilage or communal space and is improved through planting.

While not related to the principle of development, the following considerations and concerns are raised in addition:

Drainage

37. We note within the Drainage Strategy that a large, dry basin is proposed to the north of Eastlands Ln; this must be included within the red line boundary and assessed as part of the acceptability of the scheme – particularly BNG and the LVIA, on account of its urbanising appearance and the possibility of safety fencing being introduced.

Open Space

38. Proposals meet the minimum threshold for open space provision as identified in Horsham District Council's Open Space, Sports & Recreation Review 2021 (OSSR) and must demonstrate compliance with its requirements and HDPF policy 43. As such, an open space strategy must be submitted.
39. It is acknowledged that not all typologies of open space can be delivered on site. In this instance, the provision of 0.1ha of multifunctional green space is expected to be provided.
40. A communal area is proposed alongside Eastlands Wood and PRoW 1779, however it does not appear to be accessible to the development. This must be revised in line with an open space strategy, as above, in order to better integrate with the scheme.

RECOMMENDED CONDITIONS: N/A

NAME:	Elly Hazael Trainee Landscape Architect (Planning)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	18/05/26
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	19/05/2026