HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land East of Oaklands Henfield Road Cowfold West Sussex
DESCRIPTION:	Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for access.
REFERENCE:	DC/26/0913
RECOMMENDATION:	Holding Objection / More Information / Modification Objection

SUMMARY OF COMMENTS & RECOMMENDATION:

2nd set of comments

It is regrettable that no consideration has been made to providing an alternative layout and reduction of dwellings, therefore the current scheme remains unsupported on landscape grounds.

Modification has been made to the proposed vehicular access, resulting in the removal of T6, subject to a TPO, as well as T5 and T38, fragmenting the green infrastructure along Henfield Road. Compensation of 7no. Oaks is proposed; comparable value notwithstanding (point 14), the proposed locations of these Oaks result in deterioration of veteran tree T21 and significantly limit opportunities available for open space provision as per the OSSR (point 30).

Minor modification has been also made to the road layout in order to avoid the RPA of veteran T21, however it has not been demonstrated that proposals would not result in its deterioration, particularly given the concerns outlined above. Therefore, in accordance with NE and FC's standing advice, the scheme should be refused (point 17).

Further, beyond the retention of vegetation – which has not been demonstrated, as above - a robust mitigation strategy continues to be undefined and is intended to be developed at Reserved Matters. This is inconsistent with GLVIA3, whereby assessment findings should inform and influence proposals at this stage, not post-hoc (point 14).

Finally, concerns regarding open space remain unresolved and the provision is considered deficient.

As such, the proposals remain contrary to *Shaping Development in Horsham District* and continue to raise conflict with HDPF Policies 25, 26, 31, 33, 43, CNP Policy 2, as well as Policies 13: The Natural Environment and Landscape Character, 14: Countryside Protection, 17: Green Infrastructure and Biodiversity and 28: Community Facilities and Uses of the emerging Local Plan.

1st set of comments

While there is scope to accommodate some form of development within the proposed site, the proposals in their current form are considered to give rise to unacceptable adverse landscape character and visual effects given the imposing layout without consideration to existing landscape

features. Particular concern is raised regarding the direct and indirect effects of development on veteran trees, which will result in their deterioration or loss, contrary to standing government guidance.

Taking into account the requirements for SuDS, underground services and easement zones, access, open space requirements, and protection of key landscape features such as the veteran trees and the central, historic hedgerow and tree line separating the field parcels, the proposed scheme demonstrates that it is not possible to accommodate and integrate 40 dwellings sensitively and successfully within the receiving landscape. Therefore, the number of dwellings must be reduced significantly and the layout modified to demonstrate no deterioration or loss of veteran trees and to retain and safeguard the central hedgerow and tree line, all of which are important, representative key features that positively contribute to the landscape character of the area.

Generous buffers must also be provided, particularly adjacent to the western boundary and central tree line, in order to integrate the development sensitively within the landscape framework and soften its appearance.

Finally, further consideration should be given to SuDS and open space provision to meet minimum requirements as identified in the OSSR and to deliver a high quality scheme.

See details below.

MAIN COMMENTS:

Site description & context

1. The proposed site is located outside but adjacent of the Built-Up Area Boundary (BUAB) of Cowfold, in a countryside location. It comprises two irregularly shaped fields, separated by a historic hedgerow and tree line, and a pond. It is bounded by mature trees and vegetation, save for the western boundary which abuts vegetation, dwellings and a garage on the A281.
2. The site holds some rural and pastoral qualities on account of its undeveloped nature and landscape features which contribute to the rural landscape setting of Cowfold. Nevertheless, urbanising detractors are also present and comprise the garage to the west and the sewage works to the northeast. Dwellings are found to the northeast, however these are not perceived as significant detractors and are congruous with the settlement edge character of Cowfold.
3. The wider character is mixed in nature. Urbanising detractors comprise the village of Cowfold to the north and west, however, intrinsically rural farmland can be found to the south, punctuated by parcels of woodland, hedgerow and tree belts.
4. 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 1775/Eastlands Lane to the north, running west-east
    b) PRoW 1777 to the east, running north-south
    c) PRoW 1780 to the south, running west-east
    d) PRoW 1778 to the south, running northwest-southeast, connecting to 1780
5. Views of the proposals from the footpath network are limited due to intervening vegetation and local topography. However, glimpse views are possible from PRoW 1775/Eastlands Lane, which are experienced by receptors within the countryside, read in line with the wooded and rural context of the surrounding area. Eastlands Lane, also a public right of way, is quiet and tranquil in character, therefore the site's undeveloped nature positively contributes to the recreational enjoyment of the users of this footpath.

Landscape Character & Capacity

6. 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).
7. 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: *small and medium size pasture fields and some larger arable*

fields; mostly small scale intricate landscape; field ponds; and *small farmsteads and cottages dispersed along lanes and tracks*.

8. Key issues include *loss of hedgerows and shaws*, and key sensitivities to change include *suburbanisation on main road routes*.
9. 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.*
10. The Horsham District Landscape Capacity Assessment (2021) locates the proposed site within Local Landscape Character Area (LLCA) CF4: Cowfold. The study highlights relevant landscape and visual features such as the, '*small scale, irregular field pattern'*, '*pasture fields bounded by thick hedgerows with frequent hedgerow trees*', '*existing village edge mostly softened by trees and hedgerows*', '*narrow hedgerowed country lane on the northern boundary'* and '*predominantly strong rural character despite the presence of a sewage farm and allotments in one field'*.
11. The study identifies that the moderate-high landscape sensitivity together with the low-moderate landscape value gives the area a low-moderate capacity for small scale housing development.
12. It highlights that if access was proposed along Eastlands Lane, it could result in an, 'unacceptable adverse impact on the hedgerows and the rural character of the lane'.

LVA

13. The LVA provided has been reviewed following the Landscape Institute's Technical Guidance Note (2020).
14. Key parts of the assessment itself cannot be relied upon and should be treated with caution, which include but are not limited to the following:

    The LVA rebuttal dated 29/10/26 is noted, however it does not resolve previous comments. The main point of contention appears to be that mitigation is intended to be detailed at Reserved Matters. However, GLVIA3 is clear that LVAs should operate as an iterative design tool, with assessment findings feeding back into the siting, layout and design of a proposal for any new form of development (paras 4.6-4.8, 4.21, 4.24-4.25). As such, primary mitigation should be demonstrated and embedded within the scheme at this stage in order to establish likely residual effects, as opposed to being deferred until after the layout has been approved.

    Further, the rebuttal refers to the removal of T6, subject to a TPO, but fails to acknowledge the loss of 2no. additional trees, T5 and T38. In combination with the access widening, this will permanently alter the character and appearance of Henfield Road and result in fragmentation of its green infrastructure, eroding the landscape character.

    7no. Oaks are proposed as compensation for the loss of T6, however the loss of visual amenity and resulting adverse visual effects has not been sufficiently addressed.

    To avoid a protracted exchange on all individual points, key points are addressed in blue, below.

    a) Other than embedded mitigation measures such as the retention of the central corridor and boundary vegetation, mitigation proposals are described only in broad terms and their implementation, establishment and long-term effectiveness are not properly evidenced or reflected in the layout proposals. Further, the retention of the central corridor and boundary vegetation has been over relied upon on to reduce residual effects (see further comments on this below). As a result, the conclusions on residual adverse landscape and visual effects have been understated.
    b) It is unclear how conclusions on landscape value, landscape susceptibility and visual receptor susceptibility have been reached, as the criteria have not been provided within the methodology.

c) Criteria for value of views includes the judgement of the view; for example, a criterion for a low value view is that it's judged to be of low value.

d) Residents at home have been excluded from the assessment as visual receptors, despite being noted as being of predominantly higher sensitivity and that the properties on the A281 are described as having an open aspect under 4.1. While a LVA does not normally assess individual views, it should nevertheless consider the collective visual experience of receptors and identify adequate mitigation measures, particularly where these receptors have been identified as highly sensitive and likely to experience adverse effects as result of the proposed change.

Substantial change has been acknowledged, with thanks. However, while the applicant states that access cannot be gained, it is not agreed with that boundary treatments such as fencing will aid in reducing landscape and visual effects.

15. There are a number of remarks and conclusions that are also disagreed with, which include but are not limited to the following:

a) Landscape effects

i. It is not concurred with that the site has an urban fringe character. The site is deemed to strongly reflect key characteristics of the local published landscape character assessments; see point 7 in relation to the J3 LCA.

Key characteristics of J3 LCA that are found relevant are listed under point 7. The boundary vegetation and central wooded corridor are not the only features found that are intrinsic to the landscape character.

ii. Lack of criteria notwithstanding, the value of 'Site features: Landscape pattern; trees and hedgerows, boundaries' should be 'local' as opposed to restricted to 'site', given its positive relationship and contribution to the tranquillity of Eastlands Lane as well as the contribution to the rural setting of Cowfold.

iii. Further, the assessment states that there are no known historic features or cultural associations linked to the Site, however the mature hedgerow and tree line separating the fields is a historic landscape feature found in historic maps dating to the 1830s-1880s. Further, HDC's Arboriculturalist has identified two veteran trees on site. As such, lack of criteria notwithstanding, the 'Site Features: historic and cultural associations' receptor should be afforded a 'local' value and a high susceptibility to change, resulting in a high sensitivity.

iv. We highlight comments made by HDC's Arboriculturalist scrutinising the tree survey and AIA. As a result, and in addition to the incursion on root protection areas (RPAs) and vegetation as a result of the layout, there is disagreement in relation to the degree of retention of landscape features, particularly regarding veteran and mature trees. As such, the overall magnitude of change to the three site features identified is assessed as medium, as opposed to very low.

v. The effects of the associated light pollution as a result of the development are also noted to contribute to the above medium assessment, particularly regarding veteran and mature trees.

vi. The assessment concludes that effects on all receptors reduce to 'negligible or potentially beneficial' significance over time as a result of the landscape setting maturing. It is considered, however, that the landscape setting is already mature therefore this cannot be relied upon to reduce effects, particularly given the removal, deterioration or loss of landscape features as suggested under iv above, and without discussing how the vegetation is secured in the long term to remain an effective mitigation measure.

vii. In any case, adverse landscape effects will not reduce after a 10 year period given the permanent alteration of landscape features in combination with no mitigation measures beyond retention.

b) Visual effects

i. Using the criteria provided, viewpoints 4 and 5 should be afforded a medium value, as opposed to low.

This was an error and should reflect sensitivity, not value, with apologies. The point remains, given the receptor location on a PRoW, however the residual visual effects are unlikely to change as a result. Closed.

ii. 'Magnitude of change' to Viewpoint 2 would be medium, as opposed to low, as the widening and level change needed for the access would result in the loss of vegetation and extent of the view occupied by suburban development.

The rebuttal states that medium magnitude of change is now agreed with, with thanks.

iii. Visual effects are noted to change at year 10, however no mitigation has been proposed beyond retention of the central corridor and boundary vegetation.

The rebuttal states that planting would aid the integration of the new access into the wider streetscene, however no planting is proposed. This point remains unresolved.

16. It is our judgement that adverse landscape and visual effects have not been appropriately identified or mitigated, and that further design considerations must be made in order to retain existing historic and mature landscape features, conserve the tranquility experienced on Eastlands Lane and mitigate adverse visual effects experienced by residents on the A281.

Assessment & Government Guidance

17. As per government guidance, any development that results in the deterioration of veteran trees should be refused unless there are wholly exceptional reasons. Direct effects of development can cause the deterioration of veteran trees by:

While the road layout no longer encroaches the RPA of T21, the following points annotated in blue, below, remain unaddressed:

a) *damaging or destroying all or part of them (including their soils, ground flora or fungi)*

b) *damaging roots and understorey (all the vegetation under the taller trees)*

c) *damaging or compacting soil*

d) *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*

Proposed road in between T21 and T20.

e) *increasing levels of air and light pollution, noise and vibration*

Construction effects notwithstanding, proposed dwellings and associated lighting and vehicular activity.

f) *changing the water table or drainage*

Proposed SuDS either side of T21's RPA.

g) *changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss*

Indirect effects of development can also cause the deterioration of veteran trees by:

h) *breaking up or destroying working connections between woodlands, or ancient trees or veteran trees*

i) *reducing the resilience of the woodland or trees and making them more vulnerable to change*

As per d & e.

j) *increasing the amount of dust, light, water, air and soil pollution*

As per d & e.

k) *increasing disturbance to wildlife, such as noise from additional people and traffic*

As per d & e.

l) *increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*

No protection proposed.

m) *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*

Informal Open Space is currently proposed around T21.

n) *changing the landscape character of the area*

Proposals result in change to the landscape character of the area.

18. 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 loss of undeveloped character, the part loss of the existing, historic hedgerow and tree line, the direct and indirect effects of development to veteran trees, the access proposals and the introduction of domestic and urbanising features, 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, 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. Further, the proposed use will incur even greater light and noise pollution over and above current levels, incongruous with the tranquil surrounds.

c) HDPF 31 & 33; the proposals do not relate sympathetically to the local landscape, do not demonstrate that veteran trees will not be deteriorated or lost and the removal of established vegetation is not appropriately mitigated for.

d) Cowfold Neighbourhood Plan (CNP) (2019-2031) Policy 2; proposals do not conserve or enhance the existing Green Infrastructure network.

19. Nonetheless, as per 5.12 of 'Shaping Development in Horsham District' (SDHD), given the proposed site's location adjacent to the BUAB of Cowfold, it is felt that subject to the provision of a sensitive, alternative layout and a reduction of dwellings, there may be scope to accommodate some form of development within the proposed site. However, the scale currently proposed is not considered to sit comfortably within the site or the landscape setting, contrary to the criteria under 5.12 of SDHD.

<u>Design Considerations</u>

20. The current layout appears imposed within the application site, without consideration for existing landscape features. Modification is required in order to secure a more considered and sympathetic scheme. This should include the retention of important landscape features and a robust mitigation strategy which may also include replacement planting measures. The mitigation strategy must be sensitive to the rural surrounds, aiming to reduce adverse effects and minimise the incremental urbanising detractors.

    As discussed under the LVA assessment, a mitigation strategy is requested beyond broad retention of vegetation, particularly given the loss of T6.

21. As per 15.a.iv, we echo comments made by HDC's Arboriculturalist and request an updated tree survey and AIA to reflect modified RPAs and veteran trees.

    The arb technical note dated 02/11/2026 and associated updated tree protection plan has been reviewed, with thanks. Concern is raised with the T6 compensation planting of 7no. Oaks with girths of at least 20cm; HDC's Arboriculturalist will advise on comparable value, nevertheless the proposed locations are not supported on landscape grounds. 2no. specimens are proposed within the RPA of T21 and the remaining within 'informal open space', which limits opportunity for recreation. Loss of amenity to Henfield Road notwithstanding, if the proposed compensation is deemed a comparable value, the proposed locations must be altered to avoid the veteran RPA and to allow for minimum on-site open space provision (points 24-30).

22. The layout must be amended in respect of the updated tree survey, but particularly of T6 and T21, demonstrating their protection from direct and indirect effects from development. This will require:

    a) An alternative access arrangement, noting that access from Eastlands Lane will also not be supported.

        Not addressed.

    b) A generous buffer around T21, which will need to be protected from trampling by post and rail fencing and not include SuDS features.

        The road layout no longer encroaches the RPA of T21, with thanks, but no buffer has been proposed, nor fencing.

    c) The retention of the historic hedgerow and tree line separating the fields and the provision of a planted buffer.

        Not addressed.

23. The provision of a deeper vegetated and treed buffer along the western boundary, as per point 16, is also expected.

    Not addressed.

Open Space

24. Proposals must demonstrate compliance with the Horsham District Council's *Open Space, Sports & Recreation Review 2021* (OSSR). As such, a detailed land budget plan must be submitted to demonstrate how the scheme will deliver an open space strategy that aligns with the requirements of the OSSR and complies with HDPF policy 43. The plan must clearly identify the various typologies of open space and demonstrate that accessibility standards and distance buffers are achievable. Locations of strategic landscape buffers, veteran buffers, and SuDS should be clearly demarcated. Additionally, it must include a table quantifying the area allocated to each typology and confirm how the scheme meets the overall open space requirements. Please refer to the OSSR for guidance on the design and minimum sizes of the various typologies.
25. Cowfold is listed within the report as having a deficiency in all categories save for Parks and Allotments, however the largest deficiency is with Natural/Semi-Natural Green Space. Please refer to the OSSRR report for design standards.
26. Below are the requirements generated by this size of development:
    a) Allotments: 155m^2
    b) Multi-functional Greenspace: 3771m^2, of which:
        i. Parks and Gardens: 1115m^2
        ii. Amenity Greenspace: 498m^2
        iii. Natural and Semi-Natural Greenspace: 2087m^2
    c) Children and young people: 77m^2, of which:
        i. Children: 43m^2
        ii. Young people: 34m^2
27. Please note that SuDS schemes will not be counted towards the quantity standard of amenity greenspace.
28. The provided Land Budget Plan must be amended to be more detailed than the existing 1.15Ha of 'Green Zone'.

    Not addressed. This must be amended prior to determination.
29. If the minimum on-site provision cannot be delivered, an off-site contribution must be made, as per OSSR requirements. It is acknowledged that not all typologies of open space can be delivered on site. There is however an expectation that the needs generated by the multi-functional greenspace typology will be met.
30. Concern is raised with the quality and the location of the open space areas indicated, which fall within the RPA of a veteran tree. This must be revised in line with an open space strategy, as above, in order to better integrate with the scheme.

    Not addressed. This must be amended prior to determination; see point 21 regarding further reduction in available open space.

SuDS

31. Clarification is requested in regard to the SuDS ponds, which are illustrated as having permanent levels of water in CGIs but described differently throughout the documents, such as swales.

    Not addressed.

    a) J3 LCA is characterised by field ponds (see point 7). Ponds with permanent levels of water would therefore be welcomed as a landscape feature, providing greater amenity than basins and having further benefit in addressing the SuDS pillars of amenity, water quality and biodiversity. As such, permanent water levels are recommended. Please confirm.

        Not addressed.

b) If basins or swales are proposed however, the inaccurate CGI visuals should be amended, as they may lead to misunderstanding of the intended design and landscape strategy.

Not addressed.

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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DATE:	25/08/2026 16/11/2026
SIGNED OFF BY:	Inês Watson CMLI Specialists Team Leader (Landscape Architect)
DATE:	28/08/2026 16/11/2026