

Objection to Planning Application DC/26/0934

Bakery Cottage, Henfield Road, Cowfold RH13 8DR

We are writing to Comment on the Planning Application DC/26/0934 “Demolition of existing vacant storage buildings and erection of 9no. residential units, provision of open space and retention of pond”

Our comments fall under 5 headings:

1. Impact on the character and ambiance of village life in Cowfold
2. Cumulative effect of multiple proposed planning applications
3. Change of designation and use of the site
4. Safety concerns regarding pedestrians, pavements and access
5. Unacceptable adverse landscape character and visual effects (Inadequate wildlife plan)
6. Insufficient planning and allowance for drainage

The 3 pages of drawings entitled “Loss of Woodland – Watermead – Bakery cottage comments”, also form part of our comments.

1. Impact on the character and ambiance of village life in Cowfold

Recently a Neighbourhood Development Plan (NDP) was developed with strong support from Cowfold residents. Whilst it has not been fully adopted, I trust that planning officers would be mindful of its recommendations. That plan sought to balance **retaining the peaceful and rural character of the village**, together with allowing some **modest** development to meet Govt targets to increase new build houses by around 10%.

- Cowfold has grown from a genuine small rural village and retains that sense of community, neighbourliness and shared responsibility, lost in larger conurbations. As a result, there are a number of historical quirks in use of land, which would not be acceptable to modern planning guidelines. However, by goodwill, tradition and understanding, these limitations are overcome by informal discussions, agreements settled with a handshake and shared community spirit. Similarly properties somewhat crowded together with reduced garden amenities, have benefited from fine rural views and borrowed landscapes.
- This planning application clearly has taken scant account of these it looks as if it is being rushed through, without the common courtesy to engage with and consult the local neighbours. Planning and work has gone on on this site for over two years. We get 2 weeks to comment on the proposals.

The neighbourhood plan sought to retain our village character. These applicants have already ridden roughshod over such courtesies.

Loss of Amenity

Two of the properties adjoining the proposed site (Bakery Cottage and Granary Cottage) are terraced, and the sole access to their gardens is through their houses. Furthermore, their gardens are narrower than the house frontage and are generally offset to their frontage. Old Bakery has no rear garden at all – merely a 8 foot patio and it has a view out onto a rural woodland setting. By courtesy, the previous tenant of the industrial building on the site would allow us access to help maintain the fences, keep weeds down, and bring in the larger quantities of building and garden materials and help dispose of garden waste. There seems to be no provision for neighbourly access as part of the habitat management plan.

Similarly, when the site was open (with extended opening hours) villagers were welcomed to walk their dogs and make use of the wooded areas. The wild-life plan makes no suggestion that such courtesies will be maintained and extended.

Minimum proposed amendments

- That each and every property adjoining the property be given, by covenant, rights to access the retained woodland over open and public footpaths and the ability to build gates on their property with full and easy access for people and garden equipment, materials and garden waste removal.
- That covenants be enacted to ensure all fencing is adequate and in keeping with the rural character of the village (a close chain fencing on concrete posts is NOT suitable) and that the owners of the said properties be collectively responsible for the repair maintenance and replacement of ALL boundary structures.

2. Cumulative effect of multiple proposed planning applications

The Cowfold neighbourhood plan, recognised the need to allow limited housing developments in designated areas and subject to careful planning considerations to increase the amenity of the village and contribute to the need to build new housing stock in England and Wales.

As far as I am aware, plans are in place or building completed on all of the areas proposed, thus meeting these guidelines, without the need for further housing development.

No such building was proposed in the Southern end of the village.

And yet 4 proposals are under consideration. :

- This planning application DC/26/0934
- DC/26/0913 for 40 houses
- DC/26/0472
- Plus a number of houses being proposed adjacent the already developed southern arm of Watermead (see A on map right).

All of these developments have access via unsuitably narrow access “roads” (narrow tracks would be a more accurate term) without pedestrian pavements (and fronting onto narrow and inadequate pavements) with all these entrances having limited sight lines and being within 20-50m of each other.

We consider that this unacceptably hazardous and will increase the congestion and frustration on a road already overcrowded and badly in need of further speed restrictions such is the congestion and dangers already currently posed.

Minimum proposed amendments

- That all these proposals should be reduced in density by about 50%, unless proper two-lane roads with adequate pavements on BOTH sides be provided and sight lines improved.
- That planning applications NOT be considered in isolation but take account of other likely planning and building and with an eye on the latest version of the Cowfold Neighbourhood plan whether adopted or not. Planning applications which are not foreseen on that plan should ONLY be of the very highest quality with respect to low density, excellent access, retention of amenities, habitat, woodlands, hedgerows vintage trees etc

3. Change of designation and use of the site



The applicants appear to be hiding that this planning application is presumably concealing a notice to change the designation and use of the site. It is quite disingenuous for the applicants to suggest that they are replacing vacant **storage buildings**.

These are not vacant storage buildings. They are fully facilitated SINGLE STOREY light industrial or agricultural units (buildings) with full power, water telephone connections etc. The only reason they are vacant was because they chose to move and the current owners have not sought a replacement.

Demolishing a serviceable business property to build housing may be profitable, but is not necessarily the best use for the village.

There is a shortage of light industrial and business properties in the neighbourhood. Brookhill farm industrial site is in full use, as is Oakdene business estate and all the premises at Fowlers, Our retail premises are full (or just changing tenants) and new businesses springing up (two cafes; a kitchen shop; dog beauty parlour etc). These properties provide local employment (arguably a greater priority and need than housing) Businesses contribute to local rates way above the cost of amenities they make use of compared to houses. (Businesses do not need schools; citizen advice centres; support for the arts; GP surgeries etc).

4. Safety concerns regarding pedestrians, pavements and access

The planning application takes no account of pedestrian use, which is unacceptable when climate change is focussing on the provision of local amenities and pedestrianisation over car use. Cowfold retains excellent local amenities (pub; GP surgery; COOP supermarket; hair saloon; dog grooming; two cafes, sports fields, community centre, village hall pub, and scout hut all within close walking distance of the proposed development and many if not most residents walk to these amenities. This is not by accident but by choice and by enforcing and withholding strong planning consent.

It is thus disappointing that the development has made NO provision for pedestrians by building adequate pavements and encouraging walking, and especially down what will become a busy entrance. This is especially so when the site is planning family housing. We regularly witness minor accidents outside our house and cars have mounted the narrow pavement at speed with pedestrians present.

The reason is, of course, is that this would emphasise the inadequate width of the entrance to the proposed development and its poor lines of site with large high thick hedges to the north and the car/van display podium to the south. Two cars CANNOT pass at the entrance, and too many times have we, the local residents, noted cars having to push out into the road to get visibility causing sharp braking on the A281, vehicles turning in nearly ramming cars about to exit or worse braking hard to avoid pedestrians often with prams. It is used by delivery trucks and vans notorious for driving too quickly and bad parking. The junction is already an accident in waiting. Doubling the properties using it will simply half the time before that accident occurs.

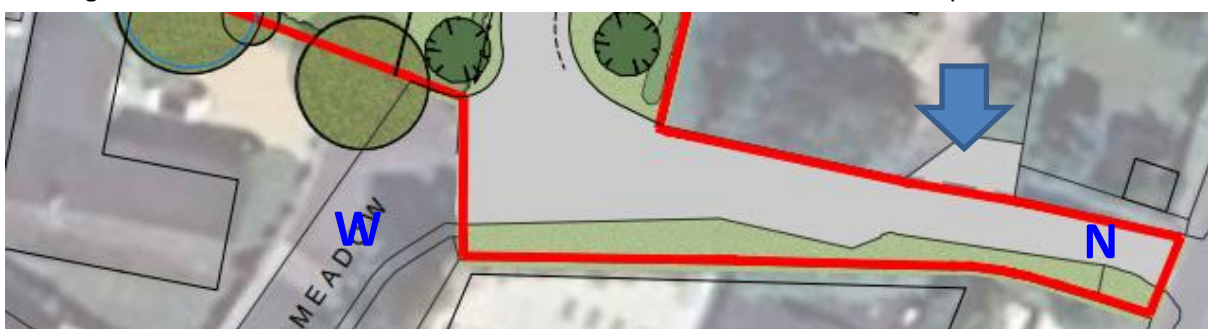
Take a look at the satellite image below and compare the width of the "housing estate road "W" with the narrow entrance "N".



Note the indentation shown on the plans in the planning application and at the entrance and arrowed below, and which looks like a parking or passing place is NOT REAL.

It is the turn into a private driveway and cannot be used as a passing or parking space.

Note again the difference in width of the narrow road allowed for in the development at the



southern end of Summer Meadow ("W") compared with the width of the entrance "N". This entrance cannot be widened. W allows two cars to pass; N does not allow two cars turning in or exiting to pass each other. Maybe it is formally within inches of being wide enough. Just try it or simply watch cars entering and exiting.

The entrance is opposite Eastman's lane with a very minor and dangerous slight offset, making this a awkward 4-way junction, and adding to the confusion and dangers especially if there is to be increased traffic from development up Eastman's Lane (single lane track) and another entrance at Oaklands 20m to the south.

5. Unacceptable adverse landscape character and visual effects (Inadequate wildlife plan)

Please see the 3 paged pdf of drawings entitled “Loss of Woodland – Watermead – Bakery cottage comments”, and submitted as part of this commentary.

Landscape Character & capacity

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).

The site and the surrounding contextual landscape are deemed representative of the local LCA, described as having a generally ‘undeveloped rural character’

Key issues of concern include loss of hedgerows and shaws, and key sensitivities to change include suburbanisation on main road routes.

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.

“Draft Habitat Management and Monitoring Plan”

We refer to the applicants “Draft Habitat Management and Monitoring Plan”

The plan refers to retaining two woodland parcels:

- north-west: other mixed woodland;
- south-east: other broadleaved woodland.

and makes significant play of creating: new trees, a rain garden; introduced shrub planting etc, however these are all garden like-manicured planting (as far as can be assessed) and not any attempt to maintain ecological diversity, nor expand the woodland areas (shaws”). Indeed the rain garden is probably only being created to improve water drainage from the site, and reduce the need for road run-off drainage into an already over-burdened sewage system (see below).

They refer to ecological enhancement features on drawing PR124901_68A including:

3. New native hedgerow
4. New other neutral grassland
5. New modified grassland
 - bat boxes / bat bricks,
 - bird boxes / integrated bird features,
 - log piles / deadwood habitat,
 - bee bricks / bug hotels,
 - dark corridors for bats,
 - hedgehog permeability where feasible.

NONE of the above are shown on the map.

Negative Impacts

What the plan does not discuss nor show is

- The loss of a well established (vintage) **Oak Tree** around the time the property was sold
- The removal of log piles and deadwood habitat which was maturing nicely as habitat for invertebrates and small mammals. This was removed around the time of the sale of the property.
- The removal of a significant portion of the existing woodland in the NW corner
- The loss of the trees and native wild scrubland in the North-East section of the plan (which gets no mention at all).
- The loss of hedgerows in the South East corner adjacent to or forming part of the SE corner broadleaved woodland.
- Loss of large mature trees and coppiced tress all in keeping with the Sussex countryside character
- The loss of “other modified” grassland
- Building a road over a mammal hole, currently at the edge of the extent of the NW corner woodland
- The removal of at least 9 well established and mature trees over the northern part of the property based on their own ecological base map.

Specifically the Habitat Management Compartments table states

- *Other mixed woodland NorthWest corner : Retain, protect and enhance woodland structure and native species diversity.* Instead the area is being reduced in size and there is no discussion as to what enhancements nor protections will be put in place, instead hard standing tarmacadamed road will be install up to the new reduced boundary and is likely to damage roots.
- *Other broadleaved woodland South-east corner Retain, protect and enhance woodland structure and native species diversity.* Instead, the area appears to be being reduced in size based on the detailed site plan and is being “gentrified”. A hedgerow in this area is being lost

There is no plan to retain, protect or enhance the area of woodland and modified grassland in the **Northeast corner of the proposal**. Instead that area is to be entirely covered by roadway, two bungalows, (being built right up to the edge of the property), and hence probably taking out some native scrub hedgerows and replacing the vintage tress and grasslands with gardens and patios. One tree is being retained only and that is a conifer, not one of the broadleaved trees.

Please see the 3 paged pdf of drawings entitled “Loss of Woodland – Watermead – Bakery cottage comments” where we demonstrate the loss of over 60% of the woodland and open rural habitat and the loss of NINE well-established trees, plus the already completed removal of the only Oak on the property. .

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.

The proposed use will incur even greater light and noise pollution over and above current levels, incongruous with the tranquil surrounds. The current use designation as a light industrial building was not in use in the evenings and only on Saturday mornings and hence provided tranquil surroundings.

Residents at home on the A281 and in Barleycroft have been excluded from the assessment as visual receptors, and in particular where three properties are built within about 10 feet of the boundary.

Their stated *overall management objectives* include

5. *Avoid deterioration of retained habitats through garden encroachment, excessive lighting, inappropriate pruning, nutrient enrichment, fly tipping or storage.*

6. *Provide measurable ecological enhancement over the 30-year management period.*

Instead they are proposing significant **ecological damage** by:

- removing hedgerows,
- removing well-established and mature trees, and
- deteriorating otherwise retainable habitats by building new gardens (never mind encroachment!), houses and roads on diverse rural habitat which has not been farmed and hence damaged by pesticides, over fertilising; mono-culture etc

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:

- 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*
 - e) *increasing levels of air and light pollution, noise and vibration*
 - f) *changing the water table or drainage*
 - 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*
 - j) *increasing the amount of dust, light, water, air and soil pollution*
 - k) *increasing disturbance to wildlife, such as noise from additional people and traffic*
 - l) *increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*
 - m) *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*
 - n) *changing the landscape character of the area*

The above [in italics] is a direct quote from Horsham planning officer's assessments on other applications.

This application suggests that many of these identified direct effects of development on veteran trees will be present alongside wholesale removal of NINE "veteran" trees and hence this development should be refused as per the guidelines above.

In our view, the 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 tranquillity experienced by residents on the A281 and in Barleycroft and mitigate adverse visual effects experienced by residents on the A281 and in Barleycroft.

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.

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.

Although mitigation proposals and a monitoring strategy are described in some detail, it is not clear how the likely substantial costs of these mitigation measures will be met and by whom. No plan has been set up to manage the site, nor have any covenants been proposed to ensure these promises are adhered to. In terms of maintaining rural landscapes, ecology and habitats, we should point out that 30 years is but a drop in the lifetime of a rural landscape. A newly planted oak tree, or other broadleaved tree, will barely be established after 30 years far less being vintage nor mature.

The mitigation proposals (even spanning over 30 years) will still not make up for the wanton loss of habitat and landscape, which will be incurred during the proposed development building.

We believe that the loss of habitat and amenity on this site is unacceptable and especially resulting from the 5 houses proposed in the north end of the site. Access to this amenity area should be provided to all properties adjacent to the property and indeed consideration could be made to donating or selling this part of the property to currently adjoining properties under covenant that they will manage and enhance the biodiversity and rural character of the property.

For the 4 houses proposed which predominately overlap the current building and parking area to the south end of the development, the loss of habitat is minimal and could be accepted, provided it is decided that the value of building houses over retention of income generating business premises is accepted. Nevertheless, even in this area a better layout arising from the removal of the need for a through road, will enable an improved Habitat Management and Monitoring Plan to be completed, with much lower costs to be borne under covenant by the new house owners.

6. Insufficient planning and allowance for drainage

The applicants recognise that the soil in the site are a heavy clay mixture and will not absorb water, even with a "rain garden". They acknowledge that the plans will cause a significant increase in run-off water, which cannot be absorbed by the ground and will need to be piped away.

They are hopeful this can be accommodated by the existing surface water pipe servicing Watermead, but suggest a new pipe may be needed to connect to the main surface water run-off pipe under the A281 or even take this all the way to the brook under the A281.

They have NOT consulted long-established residents who can clearly state that flooding has been known from the brook where this outfall is proposed. There are regular complaints of flooding in this lower end of the village, with surface drains regularly overflowing. The existing drainage infrastructure is maxed out as is evident from the recently won compensation won for subsistence damage due to runoff from the roundabout opposite the COOP in the middle of the village and which drains into this area now. The pipes now draining that water are at maximum capacity and cannot cope with our current annual thunder storm conditions.

Climate warming is expected to worsen extreme weather conditions including long dry spells hardening the land and creating the conditions for fast run-off followed by major and more heavy thunderstorms and torrential rain. It is irresponsible to add to this burden from the proposed development which by the applicants own admission will produce significant excess run-off compared to the current use.

Total new hardstanding, should NOT Exceed the current levels of hardstanding and critically the area of impervious surface covering plus roof area should not exceed the current area of impervious

surface covering plus roof area. Otherwise the excess water must be carried away in dedicated pipes, well downstream of the south end of the village to a watercourse which has not been known to overflow in the past 50 years, nor been seen to reach its capacity.

Specific reasons of Objection listed against your criteria.

- **Design** – Plots 8 and 9 have buildings built much too close to existing gardens. We have only 18 feet of garden (width) and overlooking open space and borrowing landscape is important. We will now stare at a brick wall (and indeed a window looking into our property)
- **Highway access (and Parking)** covered above under Safety concerns regarding pedestrians, pavements and access and the section on cumulative effects of multiple planning proposals.
- **Loss of General Amenity** – see Impact on the character and ambiance of village life in Cowfold and specifically the sub-heading loss of amenity
- **Other** – especially concerns over change of use and drainage. And Cumulative effects of multiple applications
- **Over-development** – is covered generally in most sections.
- **Privacy Light and noise.** The loss of privacy, increased noise and light in what was a dark tranquil setting are unacceptable and will especially impact our long narrow garden.
- **Trees and Landscaping** – See Unacceptable adverse landscape character and visual effects (Inadequate wildlife plan). Note over 10 trees are being removed, all well-established if not “vintage “ or “mature, plus the removal of an oak tree before submitting this planning application.

North West corner

The blue outline is Bakery Cottage showing the house frontage and narrow offset garden.

Red outline is Granary Cottage

The blue and purple lines left showing the extensions on the garden boundaries are Reproduced right to show how much woodland is being lost and our significant loss of amenity

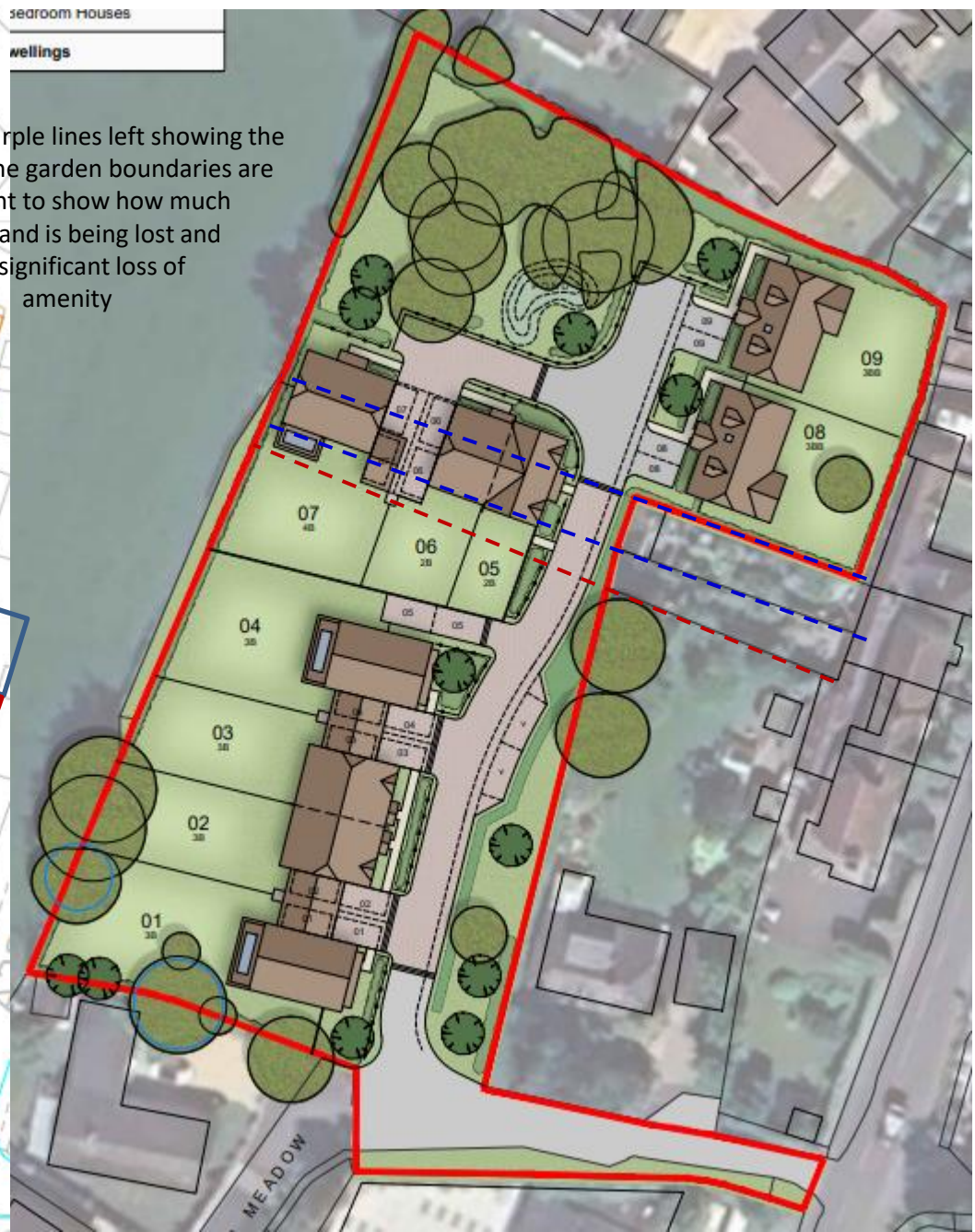
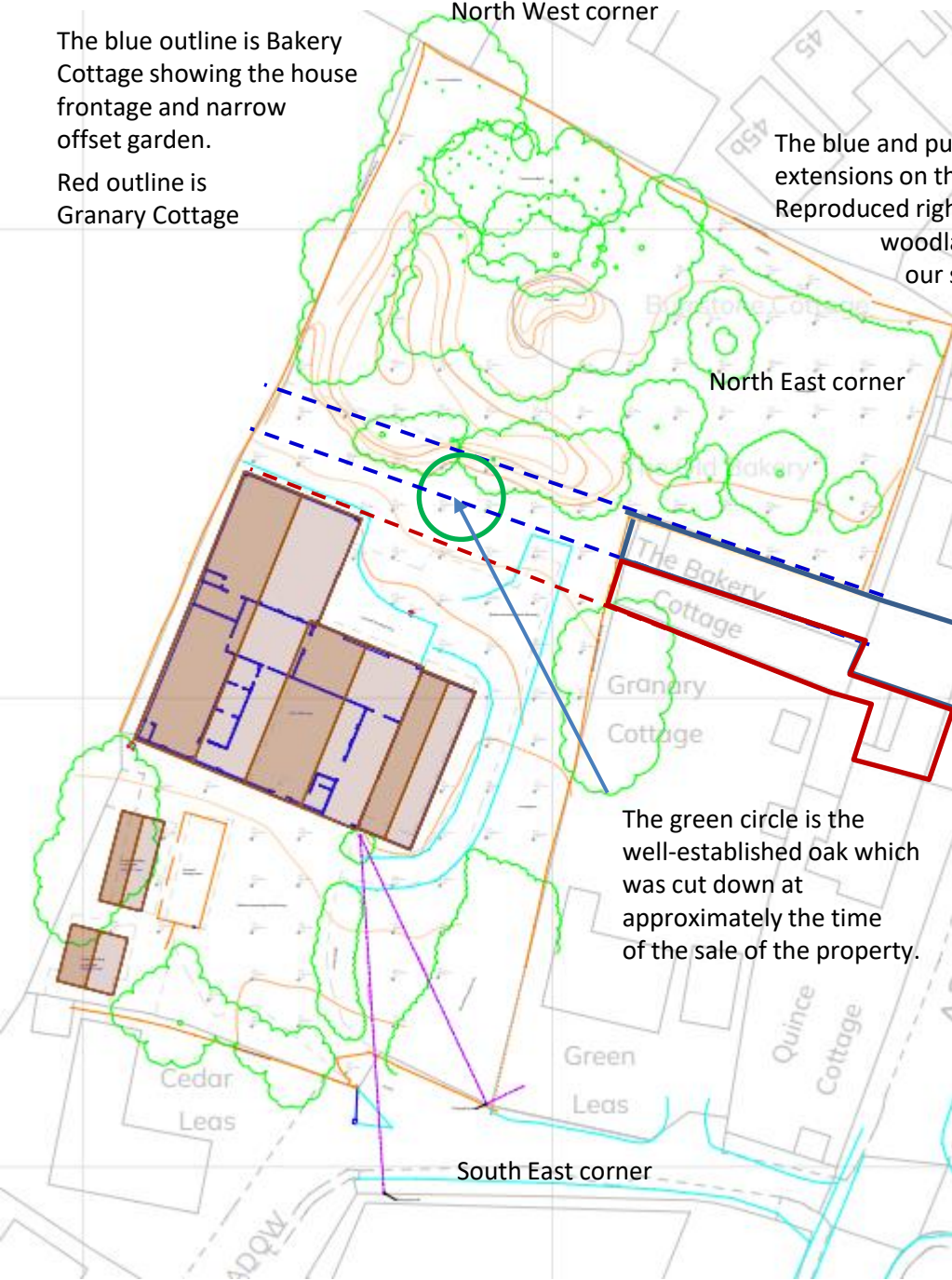
North East corner

The green circle is the well-established oak which was cut down at approximately the time of the sale of the property.

South East corner

Bedroom Houses

wellings



North West corner

North East corner

Loss of modified or neutral grassland

The green circle is the well-established oak which was cut down at approximately the time of the sale of the property.

Hedgerow being lost

South East corner

To show the extent of the **loss of woodland (shaw)**, we have superimposed the proposed “accommodation schedule” as closely to scale as we can on the original topography drawing.

Under 40% of the original areas is being retained. See the third page below.

The purple arrow denotes approximately the location of a large pile of rotting wood, which formed a wonderful habitat for invertebrates and mammals. This was cleared around the time of the sale of the property, and needs to be restored there or elsewhere on the property, although it will take time for the lost wild-life to re-establish itself.

The habitat management and Monitoring plan makes a great fuss about the retention of the woodland (their description) in the SE corner of the plot.

As we can see by comparing the topography map showing the canopy in this corner with the superimposed accommodation schedule, only one small tree is being retained, the rest is cleared and two new trees planted.



In this drawing we have taken the outline of the woodland proposed to be retained in the Northwest of the property and superimposed three copies on the topographical survey. The third outline is deemed to have been split at the blue line.

As near as dam it, three outlines fit the old green and wooded space, suggesting only 33% of the original woodland (shaw) and coppiced trees are being retained.