



Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date: 3 April 2025
Our ref: 01855

For the attention of: Planning Department planninginfo@midsussex.gov.uk

Application ref: DM/25/0090
Location: Land At Eastwood Farm Shaves Wood Lane Albourne West Sussex
Proposal/Description: Change of Use of land to equestrian, erection of equestrian facilities including indoor arena, stables, outdoor arena, horse walker, re-surfacing of existing track, creation of balancing / ecology pond, associated earthworks and provision of a soft landscaping scheme. Amended Arboricultural Impact Assessment and Appendix received on 28.02.2025.

Thank you for consulting with Place Services on the above application. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

Summary

Not supportive on landscape grounds	☒
Supportive subject to attached recommendations and / or conditions	☐
Further information required prior to determination	☐
No landscape comments / does not wish to comment	☐

We are concerned about the impacts on the landscape character and setting of the South Downs National Park due to the proposed development in this currently undeveloped sensitive location. Although the visual impacts are minimal, the Landscape Visual Assessment (LVA) lacks sufficient evidence to support this, as no panoramic views related to the included viewpoint receptors have been submitted. Overall, we have significant concerns regarding the impacts on landscape character and the earthworks required which are very unsympathetic to the character of the site and surrounding context and are not in-keeping with the rural location and the setting of the South Downs National Park. We therefore would not be supportive of this application based on the impacts to landscape character through development proposals and earthworks. Additionally, recommendations regarding the design of the scheme have been included, should approval be considered.

Site Context:

The application site is located within an arable field surrounded by woodlands to the west of Eastwood Farm. The site is separated from Shaves Wood Lane by woodland and the farm and is accessed via a track which connects through the farm. Several ponds define the west of the site, which are also located adjacent to woodlands to the west. A track currently runs through the centre of the site from east to west.

The access route runs through the South Downs National Park. Ancient Woodland surrounds the site on three sides. The topography falls towards the northwest corner adjacent to the ponds.

Planning Policy Context:

Mid Sussex District Plan (MSDP) (Adopted March 2018)

Policies of considered relevance include [inter alia]:

- Policy DP12 Protection and Enhancement of Countryside
- Policy DP18 Setting of the South Downs National Park
- Policy DP37 Trees, Woodland and Hedgerows
- Policy DP38 Biodiversity

Albourne Neighbourhood Plan (September 2016)

The following policies are considered relevant to this application:

- POLICY Countryside - ALC1: Conserving and enhancing character
- POLICY Countryside - ALC2: South Downs National Park

Mid Sussex Landscape Capacity Study (2007/2014)

The site is located within 80 Trusler's Hill Lane Footslopes. The Landscape Sensitivity of this area is assessed as moderate/high. The area is also assessed as having moderate value, owed to the surrounding designations, exposure to the scarp and perceptual quality. This is assessed overall as having low/medium Capacity for development.

Table 3.4 describes areas with low/medium Capacity as "development is likely to have an adverse effect on most of the character area and while smaller development may be possible in a very few locations within the character area, it will not be suitable for strategic scale development".

Review of the proposal/submitted information:

The application has been supported by the submission of a Landscape and Visual Appraisal (LVA) undertaken by FLA Limited. The methodology included broadly follows GLVIA3 guidelines. Although the LVA makes reference to TGN 06/19, no photography has been submitted in alignment with the included viewpoint receptors.

Landscape Value has not been assessed within this LVA. We would also have preferred the methodology make reference to TGN 02/21 Assessing Landscape Value Outside National Designations.

Landscape Character

The site is located within LW11 Eastern Scarp Slopes Landscape Character Area (LCA) of the Landscape Character Assessment of West Sussex. Key characteristics of the LCA that are relevant to the site include; concentration of Ancient Woodland, views dominated by the scarp, arable and pastoral rural landscape, secluded in places, a mosaic of smaller and larger fields, network of country lanes, pockets of biodiversity associated with woodlands, ponds and stream valleys.

Key Issues (Change) within this LCA also includes the visual impact of new rural development including horse riding facilities. Sensitivities include the high level of perceived naturalness, particularly within the wooded landscape and the Ancient Woodland cover with scenic value.

Directly adjacent to the site is LCA J2: Adur to Ouse Scarp Footslopes within the South Downs National Park Landscape Character Assessment (2020). Key characteristics relevant to the site include; small irregular mix of pasture originating as woodland assarts, frequent small blocks of Ancient Woodland, streams and field ponds.

The assessment (Paras 3.4-3.11) only assesses the general effects on landscape character, as opposed to the effects upon each of the LCAs and site and immediate context. Para 3.4 confirms that the assessment is of the local landscape character, however we would have preferred the assessment to provide effects for each of the relevant LCAs.

The LVA judges that the local character has **moderate** sensitivity. Based on the included criteria (Table 1), we would judge that the character possesses a number of features of **high** sensitivity, including its distinctive secluded location surrounded by Ancient Woodland and on the edge of the South Downs National Park. This site has a strong sense of place and is surrounded by features which contribute to the local character. We would therefore judge that the site has a **medium-high** sensitivity.

We do not disagree with the **moderate adverse** magnitude of change judgement and consider this appropriate for effects on local landscape character.

Para 3.11 judges an overall **moderate adverse** effect on local landscape character. Where our judgements differ these are not deemed substantial, and in a worse-case scenario would not exceed **moderate/large** overall landscape effects.

We do however judge that Summary Table 8 (page 38) overstates the anticipated effects at Year 5 (**neutral/slight adverse**), Year 10 (**neutral**) and Year 15 (**slight positive**). Considering that the site currently benefits from being very secluded with a strong rural feel and sense of place, which would ultimately be eroded as a result of the development, we do not agree that the proposed mitigation measures will entirely compensate for the introduction of built features into this landscape to the level suggested within Table 8. We would judge that the overall effects would not exceed **slight adverse or neutral** over the assessed timeframe.

Visual Amenity

The LVA identifies a number of public and private visual receptors in the surrounding landscape, within Paragraphs 2.12 to 2.17. However, the LVA has not been supported by any photography related to each of the viewpoints identified in Footpath 2545 Route & Photograph Locations Plan (Dwg no. FLA-EAS-LS-011). Clarification is therefore required.

Based on a desktop assessment, we anticipate that most public viewpoint receptors have **negligible** views of the application site, owed to the extent of intervening trees associated with the Ancient Woodlands. Some views are possible from Footpath 2545, Honeybourne Farm and Oatfield Cottage and these have been assessed within the submitted LVA and do not exceed **slight** adverse at Year 1. Although Shaves Wood Lane is an identified receptor, Para 3.17 b) discusses impacts close to the site entrance, as opposed to slightly north on the road where some views are potentially obtained looking south-west over the hedgerow of the northern section of the site.

Whilst concerning viewpoint receptor impacts are unlikely to be identified through submission of the Photography, we still require these to be submitted.

In the context of the LVA, we have limited concerns regarding the potential visual impact of the development owed to its secluded and well-screened nature of the site. We do however advise that LVA photography is submitted to support this and also to form a comprehensive LVA which evidences the limited available views. We do however have concerns regarding the impacts on the landscape character and the setting of the South Downs National Park.

Other Matters

Located within 80 Trusler's Hill Lane Footslopes of the Landscape Capacity Assessment, there is a low/medium capacity for development within this area. We do however note that "smaller development may be possible in very few locations within the character area". Whilst the proposed development would be considered smaller scale, it is located away from any other development and occupies a sensitive area between Ancient Woodlands and within an undeveloped pastoral field with limited detracting features and a strong sense of place. The site is also adjacent to the South Downs National Park. Although not visible, the proposed development has more adverse impacts on the landscape character in relation to some of the noted features within the Capacity Assessment.

The proposed development also forms the setting of the South Downs National Park. Policy ALC2 of the Albourne Neighbourhood Plan refers to the setting of the SDNP, and states that proposals should specifically "enhance" and "not detract" from the visual qualities and essential characteristics. We acknowledge that the development proposals include some large areas of woodland planting adjacent to the Ancient Woodland which will enhance the characteristics of the SDNP. We judge that the built proposals may detract from the setting since the field itself forms the setting of the SDNP and possesses a number of key characteristics of the I1 Adur to Ouse Scarp Footslopes LCA, including the small irregular mix of pasture originating as woodland

assarts, frequent small blocks of Ancient Woodland, streams and field ponds.

As per Policy DP18 'Setting of the South Downs National Park' within the Mid Sussex District Plan, the development proposals could "adversely affect transitional open green spaces between the site and the boundary of the SDNP". Our primary concern is how the development affects that setting and character within this sensitive area, owed to the introduction of new large buildings and earthworks. The views, outlook and aspect are however not affected by the development proposals, owed to the secluded nature of the development and very limited views into the site.

We have some concerns regarding the required earthworks to facilitate the scheme, and the 2m bank required on the southeast adjacent to the SDNP and Ancient Woodland to provide a surface suitable for the indoor arena. There is also a 3m bank proposed on the western site boundary to facilitate the menage. The physical unnatural alterations to the landform contribute to detracting from the setting of the AONB.

The largest building (indoor arena) is approximately 9.3m in height, with a 68m x 26m footprint. The other surrounding stable wings, courtyard stables and menage also introduce a large volume of built form into the undeveloped countryside. These far exceed the scale of the existing development at Eastwood Farm. Whilst development could be accommodated within this site, we question whether the scale and distribution of the proposals is too extensive considering their disconnect from any other built development.

The proposed pond is highly unnatural with proposed banks surrounding the western edge which fall by around 4m, which are elevated above the adjacent natural ponds which are located on the western edge of the site. The earthworks required are highly uncharacteristic of the local character and are not sympathetic to the rural location. The land is also raised by 3m between the courtyard building and the adjacent ponds which is also highly unnatural. We judge that significant earthworks are required to facilitate a scheme on an undulating site, which could be harmful in this sensitive location.

Summary:

Overall, we have significant concerns regarding the impacts on landscape character and the earthworks required which are very unsympathetic to the character of the site and surrounding context and are not in-keeping with the rural location and the setting of the South Downs National Park. We therefore would not be supportive of this application based on the impacts to landscape character through development proposals and earthworks.

Recommendations:

Whilst we have significant concerns regarding the impacts of the development on the local character, we have included the following recommendations if the application is minded for

approval. The acceptability of the proposals will be subject to the following recommendations been addressed.

- The proposed design and layout of landscaping appears highly formalised within this rural location. We advise that the proposed design further reflects the local rural, agricultural character. Examples include the removal of structural tree planting outside of the courtyard area.
- Additional woodland planting clusters could be proposed northeast of the proposed menage. This will further soften the proposed built features and introduce more enhancements to the scheme.
- Woodland planting in the southeast corner could extend onto the proposed bank to help soften this unnatural feature which forms a sharp 2m drop in the foreground to the Ancient Woodland and SDNP.
- Tarmacadam is not an appropriate surface surrounding the horse walker and located close to the Ancient Woodland. We advise that an unbound treatment is proposed which is more sympathetic to this sensitive rural setting. This also applies to the entry route, where the access and arrival space should also have an alternative surface treatment. We do however acknowledge that the 15m buffer has been respected.
- It would be recommended that hedgerows are planted in double staggered rows, preferably 5 plants per linear metre. There should also not be equal numbers of each species. Instead, it is recommended that it is specified in percentages, as shown below:
 - 60% Hawthorn (*Crataegus monogyna*)
 - 20% Field maple (*Acer campestre*)
 - 10% Hazel (*Corylus Avellana*)
 - 5% Trees (wild cherry, oak or hornbeam)
 - 5% made of holly, spindle, crab apple, dogwood, blackthorn and guelder rose (only a few % each IF they are present in the locality).
- Development should avoid the root protection areas (RPAs) of all trees within or surrounding the Site. Any hard landscaping proposed within the RPA of existing trees must use no-dig surface solutions. Tree protection measures for all trees must be used during construction and should be submitted in an AIA/AMS.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, but in certain urban and residential situations, better results might be achieved by the use of naturalised trees and shrubs, which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Place Services – Landscape Team
Email: landscape@essex.gov.uk

Place Services provide landscape advice on behalf of Mid Sussex District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.