

Attn: Case Officer Ms Nicola Pettifer

Horsham District Council

planning@horsham.gov.uk

5 June 2026

Dear Ms Pettifer

CPRE Sussex representation OBJECTING to

DISC/26/0152

Land at Cobwood, Burnthouse Lane, Cowfold, West Sussex

Application for approval of details reserved by Condition 13 to approved application DC/23/2172

(DC/23/2172 Construction and operation of a solar photovoltaic farm and associated infrastructure including transformers, inverters, DNO Substation, customer switchgear, security cameras, fencing, access tracks and landscaping. Land at Cobwood Burnt House Lane Cowfold West Sussex)

Pre-Commencement (Ground Level) Condition 13:

Notwithstanding the revised layout details shown on layout plan [LCS049 PLE-02 Rev 17], prior to the commencement of development within each parcel/zone as shown on Development Zone Plan DZ-2 Rev 11, the following details shall be submitted to and approved in writing by the Local Planning Authority:

- i. Detailed site plan showing final positions of panels and perimeter fencing to each parcel/zone, locations of DNO substations, inverters and customer switch gear units.
- ii. Elevational details showing the heights of the panels in parcels/zones 7,10 and 11 shall include reference to associated datum points of public highways.
- iii. Details of the anti-glare tint and its durability and maintenance for the lifetime of the development. The works shall be implemented and maintained in accordance with the approved details.

Reason: As this matter is fundamental to enable the Local Planning Authority to control the development in detail in the interests of amenity by endeavouring to achieve a development of visual quality in accordance with Policy 33 of the Horsham District Planning Framework (2015).

(HDC Decision Notice Head of Development Control letter to DWD Property Control dated 21/05/24).

CPRE Sussex is concerned that for the reasons explained below, the ‘details’ shown on layout plan [LCS049 PLE-02 Rev 17], and at subparagraphs i, ii and iii of Condition 13 will not enable Horsham District Council ‘to control the development in detail in the interests of amenity by endeavoring to achieve a development of visual quality’ in accordance with HPPF (2015) Policy 33 Development Principles.

This matters greatly because the scheme, as permitted, has the potential to cause considerable harm to the amenity of nearby residents and to the natural environment and landscape.

The Cobwood External Layout Plan [LCS049 PLE-02 Rev 17]

1. The Cobwood External Layout Plan [LCS049 PLE-02 Rev 17] is an amended indicative 1:2500 scale ‘Cobwood Layout External’ plan, submitted under DC/23/2172. According to the HDC Decision Notice, the plan was received by the council on 7/05/24.

1.1 The indicative plan apparently shows the positions of panels and perimeter fencing to each parcel/zone, locations of substations, inverters and customer switch gear units, superimposed on a topographical map showing existing buildings, roads, woodland, hedgerows, fencelines - and what might be individual trees? Water features, Public Rights of Way and Listed Buildings are not shown.

2. HDPF Policy 33 Development Principles: 6 stipulates that “In order to conserve and enhance the natural and built environment developments shall be required to:

“Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development”.

3. HDC Strategic Planning (Arboricultural Officer) consultation response dated 27/03/24, Reference DC/23/2172, advises that hedgerows:

“H4, H6, H27, H28, H29, H34, H38, H39 are indicated for removal to allow for internal maintenance access roads to be built as proposed; confirmation should be sought on the exact length of the sections of hedge proposed to be removed”.

These hedgerows are not identified on the layout plan. Since the stated purpose of the layout plan is “to enable the Local Planning Authority to control the development in detail in the interests of amenity” they should be shown and identified on the plan.

4. Mature trees referred to in the Arboricultural Officer’s consultation response, and in Place Services response, 28/03/24, including T6, T62 and T83, should also be shown and identified on the layout plan.

4.1 In respect of T6, the Arboricultural Officer advises that T6 “is a large mature specimen with a notable stem size and condition that will foreseeably become of veteran status in due course. Additionally, T6 has a very high level of amenity worth when viewed with the location landscape context and is of significant landscape value due to its size, form, and location directly adjacent to Burthouse Lane”.

4.2. The officer advises that “whereby the route of the swale previously proposed within the RPA of T6 has been altered and is not located outside of the tree’s RPA”.

4.3 Clearly this tree must be retained and protected and its root protection area respected. It must be shown and identified on the layout plan.

5. The Arboricultural Officer also advises that

“A new cable route is proposed to pass through the hedge ref H15, and an additional section of cable is proposed to pass through G5, and G27, both TPO’ed groups of trees.

The manner in which the cable is proposed to be installed in these areas is with the use of an underground Directional drill this would enable to the cable to be installed without the need for any open trench excavations with the RPA of H15 or the affected TPO trees in the area.

This aspect of the proposal will require an additional Arboricultural Impact Assessment and Methods Statement to be provided setting out in detail the way the works will be completed, i.e., the location of the pits for the directional drill, the depth that the tunnel and the route of the tunnel should be included, this can be secured by condition”.

5.1 G5 and G27 should be shown and identified on the layout plan, likewise the location of the pits for the directional drill and the route of the drill tunnel.

5.2 We note that the required additional Arboricultural Impact Assessment has yet to be provided.

6. HDPF Policy 33 Development Principle 2 and 3 stipulate respectively that “In order to conserve and enhance the natural and built environment developments shall be required to:

“Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development; And

“Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built

surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views”.

7. HDC Strategic Planning in their consultation response, dated 10/04/24, Reference DC/23/2172 - Amended Plans, advise:

“With regards to the Clock House the original Heritage Assessment identifies that the Clock House would be 70 metres to the east of the site, however from looking at our mapping system the boundaries adjoin, and the principle listed building is less than 50 metres away. The proposed development would introduce linear structures, utilitarian in appearance into the currently open rural landscape which adjoins the garden of the listed building”.

(COMMENT Note this significant detail was provided by Strategic Planning’s mapping system, not by the applicant’s indicative site layout plan)

“In assessing the impact on The Clock House, para 5.57 of the Heritage Assessment identifies “the retention and improvement of the hedgerow boundaries, the grassland buffer proposed and additional planting, ensure that the Site will be seen and understood as part of the fieldscape within the agricultural hinterland of the asset.”

“From the plans submitted to date the grassland buffer is not clear with only a small space being placed between the site boundary, and the security fencing/ CCTV cameras. There would therefore be a change in character of the surroundings from open agricultural land to land containing solar arrays and the experience of the approach to the asset would alter due to the proximity of the solar arrays, fencing, and CCTV cameras on poles. This would cause harm to the setting and therefore the significance of the listed building”.

7.1 The subject hedgerow boundaries and the proposed grassland buffer and additional planting are not shown. They should be shown and clearly identified on the layout plan.

‘Elevational details showing the heights of the panels in parcels/zones 7,10 and 11 shall include reference to associated datum points of public highways’

8. The DISC/26/0152 document bundle includes Solar Panel Elevation Maximum Height 3m drawing: Drawing Number SD-39.4, dated 2/02/23, depicting two solar panels, one ‘standing’ 3m above ground level (represented by a horizontal line, and the other 2.183m above ground level.

8.1 The drawing does not include/does not refer to associated datum points of public highways.

Solar Panels: ‘Details of the anti-glare tint and its durability and maintenance for the lifetime of the development. The works shall be implemented and maintained in accordance with the approved details’

9. The DISC/26/0152 document bundle includes a Declaration for Reflection Rate of Trina Solar Modules, dated 20/04/21.

9.1 Details of the durability and maintenance of the solar panels for the lifetime of the development are NOT included. They should be provided.

Substations, Inverters and Switchgear Units

10. The DISC/26/0152 document bundle includes: DNO Substation Plan LCS SD-14, dated 7/7/21, DNO Substation Elevations and Dimensions Plan LCS SD-01, dated 23/07/20, Customer Substation Elevations and Dimensions Plan LCS SD-44, dated 26/07/23 and an Inverter Elevations and Dimensions Plan LCS SD-08, dated 23/07/20.

10.1 **Place Services in their response to DC/23/2172, dated 28/03/24 advise HDC that:**

“We do have some concerns regarding the proposed colour and finish of the proposed DNO Substation (Photomontage EDP 11). Where these features are not associated with existing or proposed screen planting, we would recommend that an alternative colour is proposed and would recommend that the finish should be matt.

The colour choice would ideally be locally appropriate and should blend with the winter landscape when views of the features would be most noticeable. We would suggest that grey, brown and black colours should be explored.

Alternatively, these could be clad or housed in a locally appropriate material similar to existing small scale agricultural or equine buildings e.g. lapped timber or brick so that they assimilate better with their rural setting”.

10.2 **Surprisingly, Place Services make no mention of the other ugly intrusive brutalist Customer Substation(s), the Inverter plant building and Switchgear building. These buildings, too, should be made much less visible either by painting them an appropriate colour or by disguising them as small scale agricultural or equine buildings.**

Deer Fence and Mammal Gates

11. The DISC/26/0152 document bundle includes some details of the Stock Proof fence that will be used across the development, and the provision of mammal gates 20cms high, 50cms wide at 50m intervals. Details are given on the scale drawing Deer Fence – Standard Details LCS SD-07, dated 18/08/22.

11.1 We refer you to Natural England Technical Information Note TIN026.

In conclusion, for the reason explained above CPRE Sussex is concerned that for the reasons explained below, the ‘details’ shown on layout plan [LCS049 PLE-02 Rev 17], and at subparagraphs i, ii and iii of Condition 13 will not enable Horsham District Council ‘to control the development in detail in the interests of amenity by endeavoring to achieve a development of visual quality’ in accordance with HPPF (2015) Policy 33 Development Principles.

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Yours faithfully,

Dr R F Smith, DPhil, BA (Hons), PGCE, FRGS
Trustee CPRE Sussex

Copy to Chair CPRE Sussex