



24.01.24

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SPECIALIST LANDSCAPE ADVICE

Thank you for requesting advice on this application from Place Services' landscape advice service. This service provides advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential landscape impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DM/23/2866
Location: Land East Of Ansty Way Cuckfield Bypass Cuckfield West Sussex
Proposal: Outline planning application (All matters reserved except for access) for the redevelopment of land to the east of Ansty to create a new Garden Community, comprising of the erection of up to 1,450 homes (including 30% affordable housing), up to 90 residential care units (C2 class), a primary school, a SEND school, health hub, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses together with ancillary and associated development including new and enhanced pedestrian/cycle routes, open spaces, and landscaping

Dear Stephen,

Thank you for consulting the Landscape Advisor to Mid Sussex District Council on the above application.

With reference to the above-named application and submitted documents received by Place Services asking for Landscape comments, our comments are made below following a review primarily of '[ES Volume 3: Landscape and Visual Impact Assessment November 2023](#),' and a site visit made by the landscape consultant on 13/12/2023.



Summary

The current application is not supported on landscape and visual grounds for the following reasons:

- Based on the submitted plans we judge that these proposals would contribute to coalescence between Ansty and Cuckfield and would therefore conflict with Policy AS2 of the [Ansty, Staplefield and Brook Street Neighbourhood Plan](#).
- Based on the assessment in the Mid Sussex Landscape Capacity Study (2014) we judge the proposals as submitted would breach the landscape capacity recommendations over most of the application Site.
- We have issues with some elements of the approach and judgements of the LVIA (detailed below) including concerns that errors in the capacity studies have been transposed into the LVIA giving erroneous judgements.
- The number of verified images is not enough to demonstrate the full effects of the proposals on the landscape and visual receptors.
- We advise that an assessment of the impacts of the proposed development on the special qualities and setting of the High Weald should also be carried out.

The proposed development is also contrary to the adopted Mid Sussex District Plan (MSDP) (2018) and to the Submission draft District Plan – Regulation 19.

Site Context

The applicant's Planning Statement identifies that the Site is located to the east of Ansty village, to the west of Haywards Heath, south and west of Cuckfield, and north of Burgess Hill, with the A23 and Haywards Heath train station within 2 miles of the site. The Site is described as approximately 202ha, with 99ha utilised for development and 103ha utilised as a Parkland Reserve. The Parkland Reserve is not assessed as part of the LVIA for the current application.

It is also identified that 'Mid Sussex is a heavily constrained District, with approximately 50% of the District classified as being in the High Weald Area of Outstanding Natural Beauty (AONB)... These designations place constraints on where development can reasonably be delivered ...'

The proposed development is located outside of the AONB however the 'Parkland Reserve' lies within. The new garden community is proposed south of the A272. It is bounded to the west and southwest by the B2036, and to the south and east by open countryside. The site is mainly agricultural with two parcels of ancient woodland. A Public Right of Way runs east-west across the site which connects to further Public Rights of Way that run along the eastern boundary of the site. The topography gently undulates across the site, with small streams running across the site. The site does not lie within or adjacent to a Conservation Area and does not contain any listed buildings. A number of listed buildings are located close to the site.

Planning Context

Mid Sussex District Plan (MSDP) (2018)

The current Development Plan for Mid Sussex District Council consists of the Mid Sussex District Plan 2014-2031 (2018), and the Site Allocations DPD (2021) and provides the overarching development plan guiding development management decisions across the district. As identified in the planning statement, the following policies are particularly relevant with regard to this proposal. We concur with this.



- Policy DP12: Protection and Enhancement of Countryside
- Policy DP16: High Weald Area of Outstanding Natural Beauty
- Policy DP26: Character and Design
- Policy DP34: Listed Buildings and Other Heritage Assets
- Policy DP37: Trees, Woodland and Hedgerows
- Policy DP38: Biodiversity

The proposals are currently contrary to the adopted local development plan.

Ansty, Staplefield and Brook Street Neighbourhood Plan (2017)

The [Ansty, Staplefield and Brook Street Neighbourhood Plan](#) was formally made on 2nd February 2017. The parish has a population of 1,755, living in 640 households. Policy AS2 'Preventing Coalescence' identifies that it is important to preserve the gap between Ansty and Cuckfield. Under this policy, "*Development proposals are expected to demonstrate that they would not result in the coalescence with any neighbouring settlement either individually or cumulatively or result in the perception of openness being unacceptably eroded*".

Based on the submitted plans we judge that these proposals would contribute to coalescence between Ansty and Cuckfield and would therefore conflict with Policy AS2.

Cuckfield Neighbourhood Plan (CNP) (2014)

Whilst the majority of the site lies within the Ansty, Staplefield and Brook Street Neighbourhood Plan Area, the northern section of the proposed developed area (west of the sewage treatment works) falls within the boundary of the Cuckfield Neighbourhood Plan (CNP). The CNP was formally made on 1st October 2014.

Key External Views (Map 5 – Page 33) are identified within the CNP and within the [Cuckfield Views Assessment \(2012\)](#). Since Cuckfield is a ridge-top settlement, a distinctive part of the character is the visual connectivity to the surrounding landscape from public vantage points. Views 10 (Church) and 11 (South Street East) provide views from Cuckfield across the valley towards Ansty and the landscape within the eastern section of the Site.

Viewpoint 14 of the LVIA addresses Key View 10 of the CNP however the full site extent has not been shown and does not include gaps in the vegetation where southern views of the downs may be visible. Viewpoints 15 and 16 of the LVIA address Key View 11 of the CNP and identify the full site extent, Grade II listed The Place and Ansty village. The proposed development could therefore be visible from Key View 11 of the CNP and may therefore conflict with Policy CNP 5 - Protect and Enhance the Countryside, considering the distinctive views of the surrounding countryside from public vantage points may be impacted.



Mid Sussex Landscape Capacity Study (2007) Hankinson Duckett Associates

The northern parcels of the Site are identified as being located within [LCA 51 Copyhold High Weald Fringe](#). The LCA is assessed as having good boundary vegetation, contributes to the setting of Cuckfield but is not overly distinctive, and separates Cuckfield from the coalescence with groups of settlement to the south.

The Site is assessed as having **moderate sensitivity** and **substantial landscape value**, which would result in a **low landscape capacity**. Sites assessed as having a low landscape capacity indicate that *“development would have a significant and detrimental effect on the character of the landscape as a whole and, or, on the setting to existing settlement or outstanding assets within the District. Development in these character areas should only be small scale and proposals would need to demonstrate no adverse impacts on the setting to settlement or wider landscape.”*

We have identified errors within the Capacity Study (2007), whereby the judged **substantial landscape value** (Table 2) has been incorrectly input as **slight value** in the Summary Table (Table 3). This error has consequentially skewed the landscape capacity judgement within Table 3, judged as **medium-high capacity** whereas the Site should be assessed as **low capacity**.

This assessment has however been superseded by the 2014 Study and therefore this is used within the LVIA as a landscape character receptor.

Mid Sussex Capacity Study (2014) LUC

The northern parcels of the Site are identified as being located within [LCA 51 Copyhold High Weald Fringe](#) with the remainder within [LCA 77 Ansty High Weald Fringes](#). This 2014 study updates the methodology from the earlier study and looks at capacity in a wider range of areas, including in LCA 77 Ansty High Weald Fringes, in which most of the site falls. This was judged to have a **low/medium capacity** which is identified as a secondary constraint. Most of the site also falls within a 1km Buffer zone from the AONB (National Landscape), also identified as a constraint. LCA 51 Copyhold High Weald Fringe, in which a minority of the northern part of the site sits, is judged to have **medium capacity** but still lies within the constraint of being within 1 km of the AONB (National Landscape).

The 2014 Study is updated based on the findings of the 2007 Study, however the aforementioned errors within the 2007 Study have been adopted within this assessment. Table 3 judges that LCA 51 Copyhold High Weald Fringes has a **moderate sensitivity** and **slight value**, resulting in a **medium capacity**. However, tabular corrections would result in a **substantial value** and should therefore conclude a **low landscape capacity**, as per Table 3.2 of the 2014 Study Methodology.

The submitted LVIA states (Para 4.1.12) that the 2007 study assesses LCA 51 *“as having a moderate sensitivity, slight landscape value and medium/high landscape capacity”*. The judgements within the LVIA are therefore based on an incorrect assessment of value within this character area, using the **slight value** assessment as opposed to the **substantial value**. We therefore judge that the assessed **medium-low value** within the LVIA is too low.

Based on the assessment in the Mid Sussex Landscape Capacity Study (2014) we judge that the proposals as submitted would breach the capacity recommendations in the study over most of the Site. As per Table 3.4, a low landscape capacity rating [corrected based on methodology] indicates



that “development is likely to have a significant and adverse effect on the character of the landscape area as a whole and is thus unsuitable for strategic scale development”.

Submission draft District Plan – Regulation 19 (November 2023).

A new District Plan is currently being prepared through the District Plan Review process. The site was subject to a draft allocation (DPH5 Land at Ansty Farm) in the [Draft Regulation 18 Local Plan in January 2022](#) and was supported by planning policy officers as a technically suitable location for strategic development proposals. The site was removed from the final Regulation 18 draft Local Plan due to apparent severe highways impacts on four junctions off site. The Submission draft District Plan – Regulation 19 identifies Ansty as a ‘small village’ in the Settlement Hierarchy.

The proposals are currently contrary to the Submission draft District Plan – Regulation 19.

Review of submitted information

The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) undertaken by Fabrik (Volume 3 of the Environmental Statement).

The assessment is identified as carried out in accordance with the ‘Guidelines for Landscape and Visual Impact Assessment’, Third Edition (‘GLVIA3’) (2013) prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) and the LI’s TGN 02/21 Assessing Landscape Value Outside National Designations.

The Site is not located within any designations, although it falls within the setting of an AONB (National Landscape).

The methodology (Appendix V3.1 – Page 112) outlines the approach taken to assessing the potential landscape and visual impacts of the development. As acknowledged in the LVIA (Paragraph 1.3) the site visits and field work used to inform the assessment were undertaken in February and March, and therefore in a reduced leaf cover. For a development of this scale and in such a prominent location, and we welcome that the fieldwork and photography has largely been undertaken during winter to ensure that a ‘worst-case scenario’ is being appraised.

The assessment includes a desktop study, a review of the landscape and visual baseline, an assessment of landscape and visual receptors, and a summary and conclusion. The Site’s baseline characteristics are reasonably described and the views that are available have been appropriately selected. However, we consider that some of the judgements in relation to value, susceptibility, sensitivity, and magnitude underestimates the likely effects of the proposed development on landscape character and visual amenity. This is explored further in the paragraphs below.



Landscape Character baseline

The LVIA assessment of Landscape Character references the National Landscape Character Assessment (NCA 122: High Weald), A Landscape Character Assessment for West Sussex (HW4: High Weald Fringes), A Landscape Character Assessment for Mid Sussex (LCA10: High Weald Fringes) and Cuckfield Landscape Character Assessment (Area 22 Highbridge to Copyhold Slopes). Following the identification of landscape character areas, the assessment appraises the landscape susceptibility, landscape value and landscape sensitivity of the Site in Appendix V3.2 Assessment of Landscape and Visual Effects. Landscape value is assessed using GLVIA3 Box 5.1.

National Character Assessment: At a national level, the LVIA describes the general character how the Site lies within the periphery of the area identified as NCA 122: High Weald, and adjacent to NCA 121: Low Weald. The High Weald National Character Area (NCA122) is identified in the national assessment as *'an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe'...* consisting of *'... a mixture of fields, small woodlands and farmsteads connected by historic routeways, tracks and paths'* with *'... prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape'*.

County Character Assessment: At a county level, the [Landscape Character Assessment of West Sussex](#) identifies the Site as being located within LCA [HW4 High Weald Fringes](#). The character is summarised as: *'Densely-wooded southern flanks of the High Weald Forest Ridge, dissected gentle gill streams draining west to the River Adur and east to the River Ouse'* with an overall management objective to *'Conserve the rich mosaic of woodland and other habitats and the intimate nature of the agricultural landscape, the high level of perceived naturalness of the area including its rural, tranquil qualities, and the intimate and unobtrusive settlement pattern throughout much of the area'*.

Key issues within this LCA include the visual impact of new urban and rural development and gradual suburbanisation of the landscape. Long views from open ground have a high sensitivity to the impact of new urban development. The overall Land Management Guidelines are to *'Conserve the rich mosaic of woodland and other habitats and the intimate nature of the agricultural landscape, the high level of perceived naturalness of the area including its rural, tranquil qualities, and the intimate and unobtrusive settlement pattern throughout much of the area'*.

The assessment and guidelines emphasise the rich, intimate, tranquil nature of the agricultural landscape and how this needs conservation.

Also at a county level, 'A Landscape Character Assessment for Mid Sussex' was published in 2005. The Site and study area lies within the landscape character area identified as [LCA 10: High Weald Fringes](#). The LCA is summarised in the LVIA as: *"densely-wooded southern flanks of the High Weald Forest Ridge, dissected gentle gill streams draining west to the River Adur and east to the River Ouse. Includes the settlements of Cuckfield, Haywards Heath and Lindfield"*. The key characteristics as described are consistent with those described within the county level landscape character assessment.

Parish Character Assessment: At a parish level, the [Cuckfield Landscape Character Assessment \(April 2012\)](#) identifies the northern parcel of the Site as being located within LCA 22 Highbridge to Copyhold Slopes. Overall, the LCA22 Highbridge to Copyhold Slopes is described as a rural landscape with historic time depth detached from settlement, resulting in **moderate value** and **substantial**

sensitivity, resulting in an assessed **low capacity for development**; *“Areas judged as having a substantial sensitivity and low capacity indicate that development would have significant detrimental effect on the character of the landscape. Any development in this character area should only be on a very small scale and the proposal would need to demonstrate no adverse impacts on the setting to the settlement or the wider landscape.”* The assessment only covers the northern parcel of the Site.

Landscape and Visual Impact Assessment

The value for the NCA in the LVIA is described as **low-high** and therefore the range is so wide it is of arguable use in understanding the effects of the application. The character description, however, emphasises the importance of this broad landscape at a European as well as National level.

Within the LVIA, in relation to the [Landscape Character Assessment of West Sussex](#), HW4 High Weald Fringes, the value of the landscape is described as **medium-high** value. The **medium** sensitivity and **low** magnitude of effect results in a judged **moderate-minor adverse** significance of effect within the LVIA. Appendix V3.2 (Page 122) justifies this judgement stating *“the proposed development would see the introduction of additional residential uses in a part of the LCA where settlement is characteristic. It therefore would not alter the key characteristics of this county level character area”*.

In our judgement:

- Settlement within this LCA is characterised as *“Dispersed historic settlement pattern, close to Horsham, the principal settlements Cuckfield, Haywards Heath and Lindfield and a few villages and hamlets”*. The proposed development is located adjacent to Ansty small village and close to Cuckfield large village, so we do not consider the scale of the proposed residential development to be settlement characteristic of this LCA. We judge it would alter the key settlement characteristics of this part of the character area.
- Based on the settlement characteristic alone, the LVIA states that the key characteristics of this LCA would not be altered. However, all other key characteristics within this LCA, such as the large and assart fields, the confined rural intimacy, the perceived naturalness, tranquillity and long views have all been neglected as considerations within this judgement.
- The judgements of magnitude and significance appear to look only at the effects of the development on landscape character at a county scale so do not reflect the adverse effects on countywide characteristics at a Site scale. We therefore judge that the **low** magnitude of effect and **moderate-minor** significance of effects judged for HW4 do not reflect the significant landscape effects at a Site level.

Within the LVIA, for ‘A Landscape Character Assessment for Mid Sussex’, LCA 10 High Weald Fringes, the value of the landscape is described as **medium-high** value. The **medium** sensitivity and **low** magnitude of effect results in a judged **moderate-minor adverse** significance of effect. Appendix V3.2 (Page 122) justifies this judgement stating, *“the proposals would increase the scale and character of the existing settlement in the immediate surrounding area but would remain set within a wooded landscape and retain the verdant skyline”*.

In our judgement:

- As previously stated, we do not consider the scale of the proposed residential development to be settlement characteristic of this LCA. We judge it would alter the key settlement

characteristics of this part of the character area. Other key characteristics within this LCA, have been neglected as considerations within this assessment.

- Whilst the characteristic wooded landscape is apparent surrounding the Site towards the east and in patches within the Site boundary, this wooded character is less present towards the western edge of the Site and adjacent to Ansty village. Although set within a wooded landscape, the topography in which the proposals are located increases the overall impact of them.
- The judgements of magnitude and significance appear to look only at the effects of the development on county level landscape character at a county scale so do not reflect the adverse effects on countywide characteristics at a Site scale. We therefore judge that the **low** magnitude of effect and **moderate-minor** significance of effects judged for HW4 do not reflect the significant landscape effects at a Site level.

Within the LVIA, LCA 77 is assessed as **medium** sensitivity and **medium** magnitude of effect, resulting in a **moderate adverse** significance of effect. Appendix V3.2 (Page 122) justifies this judgement stating *“the proposals would increase the scale and character of the existing character in the immediate surrounding area as an eastern extension of Ansty. The built form is set within a retained framework of existing woodland and tree belts”*. Within the LVIA, LCA 51 is assessed as **medium-low** value. The LCA is also assessed as **medium-low** sensitivity and **medium** magnitude of change, resulting in a **moderate adverse** significance of effects.

In our judgement:

- A key characteristic of LCA 77 is the *“gently undulating landscape with long views over the Low Weald”*, the *“transitional landscape”* to the AONB and the *“unobtrusive, scattered settlement pattern”*. Despite retaining the vegetated framework within the LCA, the land use and views of such use will be impacted because of the development. The magnitude of change to be experienced by development across a large proportion of this LCA will be substantial, and therefore we judge that the assessed overall significance of effects is too low.
- As per reasons previously stated relating to inaccuracies in the Capacity Assessment, we judge that the judged **moderate adverse** significance of effects judgement is too low and the value of this landscape should be judged as substantial. The 2014 Capacity Assessment judges the Ansty High Weald Fringe (LCA 77), of which the Site forms a substantial part, has a Low/medium capacity for development in landscape terms.

Within the parish level Cuckfield Landscape Character Assessment (April 2012) LCA 22 Highbridge to Copyhold Slopes, the LVIA assessed the value of the landscape as **medium**. The **medium-high** sensitivity and **medium** magnitude of effect results in a judged **moderate-major adverse** significance of effect. This judgement is justified as it states *“the proposals would increase the scale and character of the existing settlement in the immediate surrounding area but this is contained within the northern part of the Site, which has well defined boundaries with tree belts and woodlands, which retain the key characteristics of the landscape, the landscape pattern and the verdant sky line”*.

- Whilst the proposals retain some of the key characteristics of the LCA, as stated above, the farmed landscape will be dramatically altered because of the proposed development, with a change of landscape function proposed. Proposals will also impact the function of contributing



to the rural context and wider separation between Cuckfield and other dwellings, as can be perceived from the PRoW on the southern ridge.

- It should also be considered that in combination with development outside of this LCA, the long views of the verdant skyline over Cuckfield village ridge may be obstructed by development on the southern slopes of the Site.
- As per the description for low-capacity development areas, we agree that development would have a significant detrimental effect on the character of this landscape. Since this landscape is not small-scale, there will be adverse impacts on the setting to the Cuckfield and Ansty settlements and on the wider landscape within the countryside and neighbouring AONB.

In relation to the High Weald National Landscape the government has strengthened the duty on local authorities and other public bodies, including decision makers making planning decisions on development and infrastructure proposals, in exercising or performing any functions in relation to, or so as to affect, land in National Landscapes through Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023. Natural England advises that the new duty requires avoidance of harm to the statutory purposes of protected landscapes but also that of the conservation and enhancement of a protected landscape.

- With this in mind, we advise that an assessment of the impacts of the proposed development on the special qualities and setting of the High Weald should also be carried out.

Visual Amenity

The LVIA has been supported by 47 Photographic Viewpoints selected based on a range of representative views from within the study area and includes publicly accessible routes within the Site (Figure 4.14).

We note that the photography included within the LVIA has not been completed in line with the Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019). Type 1 (Annotated Viewpoint Photographs) have been used within the assessment. However, we would have expected these be submitted on A1 paper with adjacent single frames on A3 sheets. We would also have expected the annotated extent of the site to have been included on every submitted viewpoint.

Whilst the visual baseline is broadly in keeping with GLVIA3 we have queries and issues in elements of the approach as follows:

- Range and location of viewpoints: whilst a wide range of viewpoints have been chosen there are limited ones along the internal PRoW network, particularly along PRoW 62CR that runs east to west through the middle of the Site. Additional viewpoints should be provided close to or at S3, S24 and S22. There are also none taken from the southeast corner of the Site e.g., close to or at internal viewpoint S32. An additional viewpoint should also be provided further north-east along PRoW 72CR or PRoW 73CR. On the northern parcel of land, it would also be useful to have a viewpoint looking due west from viewpoint 27 as well as the one already provided looking southeast.

- Viewpoint selection: It is unclear why some viewpoints have been chosen when they are very close together e.g., VPs 11 and 12, VPs 23 and 24, VPs 34,35 and 36. In some cases these VPs have a limited view of the Site.
- Photograph annotation: On some viewpoint photographs either the extent of the Site has not been shown at all (VPs 3,4, 27,28,29,30,31,32) or the full Site extent appears not to be shown as the red line stops at the photograph edge (VPs 6,7,10,11,13,20,21,22,24,25,26,34,38). Very few landmarks are identified on the photos. No technical information relating to the photographs and how they should be viewed, time of day, conditions etc. It is arguable these do not meet the requirement for Type 1 annotated viewpoint photographs identified in The LI's 'Visual Representation of Development Proposals Technical Guidance Note 06/19'.
- Value assessment: Some of the value assessments of roadside views appear to be too low as most of them are well-vegetated in keeping with local character (VPs 5, 6, 9, 18, 19, 20, 38, 41, 43) or have views into or over the High Weald landscape or towards the South Downs National Park (VP13).

Visual Impact Assessment

The proposals at paragraph 5.1 of the LVIA identify a mix of residential dwellings, a local centre, schools and sports facility with areas of public open space, amenity areas, natural-semi natural green space, allotments, play areas and SuDS. The existing tree belts and landscape features within The Site to be retained and new green infrastructure is shown on a Green Infrastructure Parameter Plan. Other parameter plans e.g., for building heights and density are provided. Building heights are generally 1 to 4 storeys (up to 16m ridge height). The schools and sports facilities have a maximum height of 10m. The community hub has a maximum height parameter of up to 8m.

We have the following comments in relation to the description of the development and the information within the parameter plans:

- Figure 5.3 Green Infrastructure parameter plan and key: AONB buffer - to be kept free from built development: the width and character of the buffer and a definition of what constitutes 'built development' for this purpose should be defined as part of the parameter plan. E.g., does this only mean actual buildings or all built structures i.e., fences, walls, hard standing etc. The character of the buffer should be substantially of local landscape character features (such as a shaws where appropriate) and this should also be fully described.
- Landscape buffer: the indicative or minimum width and strategic character of these buffers need defining to ensure this parameter meets the need of landscape character, visual enhancement and biodiversity conservation and enhancement.
- Amenity greenspace: where this adjoins existing established natural and/or established vegetation including woodland the minimum width and character of the amenity greenspace needs defining to ensure that the setting and character of existing landscape features is retained and enhanced. This includes allowing a full width for pedestrian/recreational cycling/riding, SuDS, biodiversity as well as amenity functions such as play. Some indicative SuDS features are shown in these narrow landscape strips with one extending into existing woodland. This could have effects on key landscape character as well as biodiversity. Where PRow cross or border the site, the rural character and setting of the PRow should be conserved with all-weather footpaths and cycleways created separately from the existing



PRoW. The nature of this approach to treatment of existing PRoW needs describing as part of the parameter setting.

- Sports facilities: These could be at odds with the natural landscape and conservation of character where pressure for all-weather pitches and flood lighting, either as part of this proposal or in the future, could urbanise an existing rural landscape.
- SuDS/Drainage: There needs to be a specific indicative SUDs/surface drainage parameter plan identified at this outline stage.
- Access and movement: The Access and Movement parameter plan should be included in the LVIA as it is necessary to understand the effects of development on the PRoW network and give further clarity on the potential effects on existing landscape character. The character of the spine and secondary road network should be described as part of the parameters of the green infrastructure network. As a minimum these are required by the NPPF to be tree-lined in Paragraph 136 and the road networks relationship to non-vehicular access needs to be understood.

Verified images

Four visually verified montages (VVMs) are provided, and this is argued in the LVIA to be appropriate number judged on the visibility of the Site from the study area. How these verified images relate to the baseline images is not identified. However, considering this proposal is outside both the adopted Local Plan and the emerging one at the current time, and that it sits in the setting of the High Weald AONB, these four images do not reflect the extent and potential effect this scheme will have on landscape as well as visual receptors. including the extent of impact on the Site landscape itself and receptors using the PRoW both within and bordering the Site.

Visualisations can have an important role to play in communicating information about landscape as well as visual effects of a proposed development. The 'Visual Representation of Development Proposals Technical Guidance Note 06/19' states '*Visualisations help to show how a proposed development could give rise to change in the character of a place or affect the quality and nature of views...*'. It follows that visualisations should be used to show both landscape and visual change.

Significant visual effects need to be illustrated from a range of representative locations covering the types of visual receptors. At present, the effects on internal Site receptors are not covered by verified images. It is identified in the LVIA that the locations of the VVMs have been chosen to represent views of the Site from the rising ground to the north (viewpoint 1), the AONB boundary to the west (viewpoints 2 and 3) and from the wider landscape to the south (viewpoint 4). The reason for the exact locations is not described in the LVIA, nor whether the choice was made following discussions with the local authority as advised by the LI. The zone of visual influence is much wider than the selection of views.

Our comments on the chosen verified images are as follows:

Generally: Technical information should be supplied on each verified image as recommended in The Landscape Institute's 'Visual Representation of Development Proposals Technical Guidance Note 06/19'. That technical information should include visualisation type, projection, enlargement factor for intended sheet, date and time of photography, make and model of camera and lens, focal length of lens, horizontal field of view, direction of view. None of this information is supplied on the visualisations.

Verified image 1: This is from PRoW 8ACU, looking southwest towards the site with the proposed development at Year 1 set down in the landscape but still with the roofscape visible below the horizon. As shown, the image indicates the roofscape is clearly visible within the view. Depending on the nature of the actual building form and character, the effect will likely be significantly out of character with the farmed landscape urbanising the view and affecting the perception of tranquillity and rurality. At Year 15 there is little change in the view implying the proposed mitigation is not effective from this viewpoint.

Verified image 2: This view is from Cuckfield road, looking south towards the site and the roundabout junction with the A272. At Year 1 proposed development is partially visible between the retained trees. The perceptual effect is likely moderate adverse due to the change from a view of trees to elements of built structure. As the development is due to be two storey residential at this point, the effect could be mitigated by setting the development further back, ensuring a denser treed boundary, and breaking up the roof line in order to reduce Year 15 visual effects to negligible.

Verified image 3: The view is from the A272 adjacent to the High Weald National Landscape (AONB) boundary and the western site boundary, looking east across the site. The baseline shows an unspoiled farmed landscape. At Year 1 the proposed development is visible in the middle distance. There is new planting in the middle ground. This is a major change from a rural vista to an urban character over a large part of the view. There would be a major perceptual change from a rural to an urban environment. At Year 15 an uncharacteristic roofscape is visible above the proposed planting. The proposed built form should be set further back, reduced in scale and the green gap more extensively planted in order to reduce further the adverse visual effects further at Year 15. That planting, however, will in itself change the character of the landscape and the view.

Verified image 4: View from the PRoW footpath 84CR to the south of the site, looking north towards the southern site boundary. It is unclear why this viewpoint has been chosen for a verified image if nothing is predicted to be visible.

Review of assessment of Visual Effects

Residents: Generally, the value of the view to residents is undervalued at many viewpoints by describing these as **medium** or **low** which ignores the fact that some people will choose to buy or rent a house because it is either in or close to the National Landscape and in fact they are likely to have paid a premium for this privilege and the character of the view this brings, e.g., VPS9 and S14, VP19 and 20,. The scale of the change is also underestimated in several places e.g., VPS9 and S14 where the change is described as 'modest' even though the receptors are within the Site boundary in a currently wholly rural landscape but with proposals of hundreds of properties close by up to 11m in height.

Susceptibility is not just a factor of what is seen but what is heard, smelt, and perceived. We judge this would be a 'substantial' change for these properties.

In relation to magnitude of effect for West Riddens Farmhouse it is unclear how a judgement of **medium** effect during construction dropping to **low** after 15 years is arrived at as the whole extended setting of the farmhouse is substantially changing. The character of the existing view is described as open fields against a wooded backdrop in the LVIA assessment. This will be replaced by buildings which after 15 years are described as 'moderated slightly'. We would judge the initial effect would at best be 'sizeable', therefore based on the Magnitude Matrix Table A1.10, as the effects are permanent then the magnitude of effect would be **high/medium** including at Year 1. The mitigation planting may help to screen part of the buildings, but it is still permanently altering the character of the view from the open rural landscape to a mitigated urban one.

Transient from Transport Corridor: Viewpoints 5 and 6 sit either side of what would be the main access point to the proposed development. Although the magnitude of effect might be **low** at VP5, if a VP assessment had been done close to or at the main access point, the magnitude of effect and change would be far greater with road visibility splays taking out many tens of metres of boundary vegetation including potentially mature trees and cutting through hedgerow banks. Lighting columns would create additional detractors. The effect on users of the A272 would be to create urbanisation along a wide stretch. The change is described as 'Modest' in the LVIA. However, Verified Viewpoint 3 gives an idea of the scale of change which we judge as at least 'Sizeable' if not 'Substantial' based on the LVIA criteria. The susceptibility also appears judged too low (at **low-medium**) considering this is a single carriage-way road with unspoiled countryside views. Overall, the magnitude of change is likely **high/medium** decreasing to **medium** after 15 years i.e., the effect remains **moderate** and therefore Significant.

Viewpoint 8; a range of view values is given from Medium-Low to High. It is not understood how there can be such a wide range of views from one point in the same direction. The view is of an attractive, undulating, unspoiled characteristic landscape. We would judge the overall value of the view to be **medium-high** therefore. Even from a car the view will provide a substantial amenity experience, seen in the context of the adjoining National Landscape' so the Susceptibility to the proposed change we would judge also as **medium-high** not **medium-low**. It is hard to judge without more Verified Images what the scale of the effect from this viewpoint would be. Topography may screen most built elements but there'd likely be detracting sounds, lighting effects etc. It is incautious to judge the scale of change to be 'Modest' therefore. Also, it is hard to agree when the scale of change on the view is judged as 'Modest' how the Magnitude of Effect can be judged as reducing to **medium-low** after 15 years. If the magnitude of change is judged as **medium** in Year 1, it will likely stay at that after 15 years.

VP 13 is a proxy for the Cuckfield Cricket Club so the Receptor Value should be higher (**medium/medium-low**). This is a B road on the very edge of a National Landscape which should also lift the Receptor Value for road users. Many people could be driving here to experience the landscape or gain amenity value from the drive to the shops or to visit friends. The Visual Susceptibility would also be **medium** not **low** as people will be aware of their surroundings at the cricket club and likely driving quite slowly in their cars due to the nature of the lanes. The sensitivity is also therefore **medium** not **medium-low**. Whilst it seems likely that the scale of change is modest due to the distance of the VP from the site and the intervening vegetation, by the same token the magnitude of effect will not diminish over time but stay **medium** i.e., it remains Significant.

VP40,41: Value of view should be **medium** for both VPs as this is a B road, well-vegetated and with attractive views over characteristic landscape within the setting of a National Landscape. VP 40 is approximately where part of the spine/secondary road network will emerge causing extensive removal of vegetation, creating lighting and signage. The landscape buffer along this edge is limited giving relatively unfiltered views of proposed two storey properties out of keeping with a rural environment. Would judge the susceptibility as **medium** therefore and the sensitivity as **medium**. The scale of change will be 'Sizeable' if not 'Substantial' as development will likely fill most of the view during construction and Year 1 and only be somewhat mitigated by a narrow-planted belt by Year 15 through and above which built structures, lighting and disturbance will be seen and heard. The Magnitude of effect should therefore be **medium-high** moderating to **medium** at best as even with planted buffers the open character of the view will be urbanised and truncated.

The Significance of Effect remains **moderate adverse** in our judgement.

Transient from PRow

Users of PRow within the Site: We would judge the scale of effect from VP3, VP4 and VP30 would be 'Substantial' not 'Sizeable' as there would be a distinct change in the composition of the view including buildings up to four storeys high in the centre of the site. According to Table A1.10 even if the scale is judged Sizeable then the magnitude should be judged **high/medium** but if 'Substantial' Scale then the Magnitude is **high** not **medium** as the effects are irreversible. According to Table A1.11, the Significance would stay at **major** if the magnitude is **high**. Verified images are needed generally from the PRow network.

VP28: we do not see how the Magnitude of effect can be judged as Medium-Low when the Scale is judged as 'Sizeable' and the Duration is permanent and irreversible. The Magnitude in our opinion should be judged as **high/medium**. The Significance should therefore be **major**, dropping to **moderate**, at best, after 15 years. Verified images generally are needed from PRow network.

VP32: This VP assessment could have usefully been carried out further to the west at the junction with PRow 73CR. Disagree that the Susceptibility would be **medium** not **high** as walkers close to the National Landscape would be focussed on the landscape and views. Disagree the scale would be compact i.e., barely perceptible. The Description of change describes construction and built form as 'partially visible' which implies at best there is likely to be a 'perceptible change' or even a 'noticeable change'. We judge the magnitude of effect would therefore be **medium/high-medium** and the Significance at best **moderate** but bordering on **moderate-major**. Over time this could improve to **moderate-minor**. Verified images needed from PRow network.

VP19, 33, 34, 35 and 36: arguably the visually susceptibility is **medium** not **medium-low/low** as the view does contribute to the amenity experience and there is opportunity to appreciate the view. The sensitivity should therefore be **high** or **medium-high**. This could be another good point from which to produce a verified image as it is hard to judge the mitigating effects of the existing vegetation especially with nighttime effects.

VP17: this appears to correspond to Visually Verified Montage VVM 1 but this is not confirmed on the VVM image. Looking at VVM1, we would describe the Susceptibility as **high** not **medium** as the proposed development is not in keeping with the farmed landscape, and the scale as Sizeable as the roofline of the development remains widely visible in an open view. The magnitude we would judge as **high-medium** and therefore the significance as **major**. The VVM demonstrates that the significance



decreases very little between Year 1 and Year 15. The VVM does not show nighttime effects. We judge the significance would stay at **least moderate**.

Receptors using community buildings etc.: Holy Trinity Church Cuckfield VP15,16: Assessment in relation to playing fields is predicated on their being no floodlights predicted for the sport fields.

View from within the High Weald: VP13 on edge of High Weald could be a useful site for a verified image particularly to show projected night-time effects.

Conclusion

Our judgement is that the development as proposed would result in the irreversible change to part of a landscape that is considered important at both a National and European level for its intimate, agricultural character, tranquillity and beauty. It adjoins and sits within the setting of a National Landscape. The effect would be significant adverse effects on the immediate Site and its setting and to create the perception of coalescence between Ansty and Cuckfield. The effects on the National Landscape and its setting are not yet fully assessed. Errors and omissions in the approach to the assessment underplay the effect on the landscape and its function. Mitigation of visual effects rely heavily on the intrinsic character and features of the unspoiled landscape which is currently maintained.

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A handwritten signature in black ink, appearing to read "C Bailey".

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.