



12/12/2024

Stephen Ashdown
Planning Department
Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

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 re-consulting the Landscape Advisor to Mid Sussex District Council on the above application. We have reviewed the 'fabrik response to Place Services' Landscape Advice' (May 2024) alongside other submitted information and provided comments where relevant.

Review of Submitted Information

- [Para 2.1] Noted although our comments remain the same.

Landscape Character

- [Para 2.15] The justification states that the proposed development is in keeping with the scale of Cuckfield. However, the development is designed to be an 'extension' of Ansty, not

Cuckfield, and therefore introduces significant growth to a small village. The proposed development is not proportional to the existing size of Ansty village and therefore we do not agree with the justification provided.

- [Para 2.16] Noted although we disagree.
- [Para 2.17] Whilst this is an assessment of the impacts on Landscape Character, Para 2.17 relates to the visual effects of the proposals to the neighbouring National Landscape. The assessment of Landscape Character should only partially consider the visual effects (i.e. where views are identified within the LCA) and focus on the character that the site provides to the setting of the National Landscape.
- [Para 2.17] We judge that the effects will remain significant even after 15 years.
- [Para 2.18] Whilst views are being retained through limiting built development to the east, as has been demonstrated by VVM 6 (Viewpoint 23), the character adversely changed from a number of other viewpoints. Notwithstanding this, the assessment here relates to the effects on Landscape Character as opposed to specific viewpoint receptors and therefore we maintain our previous comments.

Visual Amenity

- [Para 2.20] We note that those panoramic photographs which do not have the site extent indicated are those that are located in close proximity of the site and therefore the site encompasses the entire view. We welcome the revised additions to the LVIA. We would prefer the full photographic survey to be submitted separately and further in accordance with TGN 06/19.
- [Para 2.21] The resubmitted LVIA (date) includes a number of additional viewpoint receptors to address our previous comments.

Whilst we welcome the approach within adding additional viewpoints to Figure 4.14 (Location Plan showing Visual Summary from Local Area), we note that the Internal Visual Survey (May 2024) replaces some visual receptors from the November 2023 assessment, as opposed to providing them in addition. For example, Views S28, S30 and S33 from the November 2023 assessment have been removed. We advised that the added viewpoints should be in addition to those within the November 2023 assessment, as opposed to replacements.

- PRoW 62CR: Additional viewpoint receptors have been included within the Internal Views (VP S27) and Visual Receptors (45, 46, 47). We welcome the inclusion of these visual receptors.
- South-east corner: An additional viewpoint receptor has been included (VP 32).
- PRoW 72CR/73CR: Viewpoint 48 has been added to address this concern.
- Viewpoint 27: Viewpoint 49 has been added to address this concern.

- [Para 2.23] We note that those panoramic photographs which do not have the site extent indicated are those that are located in close proximity of the site and therefore the site encompasses the entire view. We welcome the revised additions to the LVIA. We would prefer the full photographic survey to be submitted separately and further in accordance with TGN 06/19.
- [Para 2.25] Noted.
- [Para 2.26] We welcome the clarifications regarding landscape buffers and distances. We advise that these buffers are largely free of hard landscaping and any proposed features (i.e. paths, gates) are in keeping with the rural character. Introducing features into these areas could urbanise the character.
- [Para 2.27] Parameter Plans are included within the submitted DAS (Section B2). We advise that the Parameter Plans and associated text make specific reference to the Landscape Character Assessments and the key characteristics that have been integrated into the Green Infrastructure to relate back to the LCA. We also advise that specific reference to what features have been included to reduce impacts on the central PRoW.
- [Para 2.28] Noted.
- [Para 2.29] We note that the submitted LVIA (Section 5.1) now refers to the NPPF Paragraph 136 regarding the tree-lining of primary and secondary streets.
- [Para 2.29] An Access and Movement Plan (Dwg no. D3012-FAB-00-XX-DR-Y-036) has been submitted within the LVIA (Figure 5.4).

Verified Images

- [Para 2.31] Whilst additional VVMs have been submitted to provide a wider range of viewpoints to address our following specific comments, we continue to have concerns that the effects on internal site receptors are not covered by VVMs.
- [Para 2.33] VVM 1: We agree, in relation to Para 2.33, that it is the secondary mitigation such as tree-planting that we are referring to. However, as there is no perceptual change between Year 1 and Year 15 as judged from the verified image, we maintain that the significance of effect would stay at **Moderate** adverse rather than dropping to **Moderate-Minor**.
- [Para 2.34] VVM 2: Noted.
- [Para 2.35] VVM 3: Noted, however we maintain that further mitigation could be provided through setting back further of the built form and reducing its apparent scale, as well as making better use of the foreground fields for appropriate mitigation planting in the long term.

- Four additional VVMs have been submitted (VVM 5-8) in addition to VVM 1-4. These have been submitted under Section 5.5 of the LVIA.
 - [Para 2.38] Viewpoint 8: We requested a VVM from Viewpoint 8 on the western boundary however this was not submitted, as clarified in Para 2.39.
 - [Para 2.43] Viewpoint 28: We requested a VVM from Viewpoint 28 (PRoW 65CR) on the eastern boundary however this was not submitted, as clarified in Para 2.43.
- [Para 2.48] VVM 5 (Viewpoint 13): We requested a VVM from Viewpoint 13 (B2036) to the north and this was submitted under VVM 5. We judge that this view would not be considered significant.
- [Para 2.45] VVM 6 (Viewpoint 23): We requested a VVM from Viewpoints 19, 33-26 (Copyhold Lane and PRoWs to the south-east. Fabrik correctly excluded VP19 owed to the sense of enclosure from this enclosure, and submitted VVM 6 from Viewpoint 23. Whilst we cannot find evidence of Viewpoint 23 being assessed under the Transient from PRoWs in Table V3.2.3 Visual Impact Table, this would not be assessed as being significant.
- [Para 2.44] VVM 7 (Viewpoint 32): An additional VVM was submitted following requests to submit VVMs from the PRoWs to the south-east corner of the site. VVM 4 was also referenced from the previous submission. The submitted VVM demonstrates that a new built form will be introduced into the largely undeveloped landscape where views from this location are currently of the countryside. We therefore judge that the **low-negligible** judgement for Year 1 is too low. Based on the submitted VVM for Year 15, we note there is no noticeable change in the view and therefore also judge that the significance of effect would not be reduced from **minor adverse** (Year 1) to **minor adverse-negligible** (Year 15). We would suggest that further mitigation is needed, either as reduction in the height and/or extent of built form or as woodland planting to the east of the proposals in order to reduce the negative effect of the built form on the wider countryside.
- VVM 8 (Viewpoint 52): We welcome the submission of VVM 8 which was conducted from the High Weald Landscape Trail to the north of the site. However, the Year 15 image demonstrates that there is the potential for residual negative impacts of development on rising ground at the centre of the site. The proposals should be further mitigated from this viewpoint by reduction of built development at the centre and/or creation of open space or green infrastructure in that area. As the High Weald Landscape Trail is a linear route, there is some likelihood that as the walker moves eastwards and southwards, further views of the scheme will become visible.

Review of Assessment of Visual Effects

- [Para 2.37] The magnitude of effect for Year 15 has been increased to **medium-low**, and the significance of effect for Year 1 has been increased to **major-moderate** adverse. There is still potential for these judgements to still be too low. We also still judge that the magnitude of change for Year 1 would be **high-medium**, considering the permanent alteration of the open countryside view.

- [Para 2.38] We note the response, however it is our judgement that an illustrative viewpoint at or near the main access point to the development is needed to demonstrate the likely significant change to the setting of the road (which adjoins the National Landscape to the North) over a distance of a probable 100m, due to the need for extensive visibility splays, and probable lighting, each side of the junction. Existing vegetation including trees are likely to be removed along this length.
 - The impacts on vegetation within the site are set out in the submitted AIA and appropriately assessed in the LVIA under the vegetation cover site landscape receptor. The LVIA is therefore considered to appropriately assess the visual impacts on transient receptors travelling along the A272 and on the vegetation cover within the site.
 - An AIA does not assess the effects of tree removal on landscape character and visual receptors.
- [Para 2.39] The resubmitted LVIA did not include a VVM for Viewpoint 8 on the immediate western boundary, adjacent to the High Weald National Landscape. We therefore cannot be certain on the scale of effects anticipated from this location. We continue to advise that a VVM be provided for Viewpoint 8.

Whilst the viewpoint forms part of a sequential assessment of receptors using the A272, we also note that some sections of this route will experience large changes to the view owed to the introduction of a new junction which will likely require the removal of trees and vegetation along this boundary, opening the site to public viewpoint receptors and to the National Landscape. There is also a footpath running along the A272 where receptors would experience views slowly and would be more impacted by the introduction of a junction which would urbanise the countryside road and create views of the development.

We disagree with the justification for not providing a VVM opposite the new junction on the A272.

We also note that the value for Viewpoint 8 (Transient from Transport Corridors) has not been updated in the submitted LVIA.

- [Para 2.40] Noted.
- [Para 2.41] Whilst the submitted response states that an adjustment has been made to VP41 to **medium** value, this has not been reflected within 'Table V3.2.3 Visual Impact Table: Transient From Transport Corridors'. The Significance of Effect remains **moderate adverse** in our judgement. This judgement still stands.
- [Para 2.42] We welcome the additional viewpoints submitted along PRoW 62CR.
- [Para 2.43] Based on the judgements in the revised LVIA, we still judge the visual impacts would be more severe from VP 28 than as judged in the LVIA i.e. **moderate-minor** Adverse at Construction and **minor adverse** at Year 15.

- [Para 2.44] Our comment should have said at the junction of the site boundary and PRoW 73CR. However, there will be closer and more impacted near views from close to or at internal viewpoints S34, S33 and S36 for instance. Additional assessments are needed from at least one of these closer viewpoints. The grassland retention represents landscape but not visual mitigation. Therefore, the assessment of effects presented within the LVIA is considered to be representative of the change experienced by receptors using these routes.
- [Para 2.44] We judge that additional assessments are still needed from at least one closer viewpoint in this area and a verified image.
- [Para 2.45] This viewpoint is also a long way east of any built elements of the development so does not demonstrate the effects of the built structures on the site or its immediate setting.
- [Para 2.46] We are sceptical about the potential growth effects of existing vegetation and consider impacts would remain significant after 15 years. We remain concerned about the long-distance impacts of this large-scale development especially during winter and at night-time.
- [Para 2.47] Noted.

Conclusion

Our conclusions remain 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.

- [Para 2.49] The development cannot be considered an 'extension' to Ansty, this being a village of up to 640no. dwellings (across Ansty, Staplefield and Brook Street area, so will be lower) and the proposals being a development of 1450 residential units and associated infrastructure. The intervening agricultural landscape between Ansty and Cuckfield will be reduced from 1.5kms to 0.6kms, significantly reducing the perception that Cuckfield and Ansty are separate settlements. The retained vegetation and green corridor is likely compromised over at least 100m along the A272 by the need to provide lit vehicle access from a roundabout into the development in close proximity to the National Landscape. We disagree that there would be no actual or perceived coalescence between the two villages.
- [Para 2.49] Our understanding is that the strengthened duty in the Countryside and Rights of Way (CRoW) Act 2000 (section 85) applies both to plan-making and decision-making and applies both when considering proposals within an AONB/National Landscape and also when it affects its setting.



We welcome the updates and clarifications.

Megan Cowell BA (Hons) MA

Landscape Consultant

Catherine Bailey BSc (Hons) MPhil MA CMLI

Principal Landscape Consultant

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.