



Land East of Ansty, Cuckfield

fabrik response to Place Services' Landscape Advice and
Cuckfield Parish Council's Consultee Response

16th May 2024

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1.0 Introduction

1.1 On 29th January 2024, Place Services provided advice to planning officers to inform Mid Sussex District Council planning decisions with regard to potential landscape impacts from development. The applications considered are:

- DM/23/2866: 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.”*
- DM/23/2867: Land East Of Ansty Way Cuckfield Bypass Cuckfield West Sussex. Proposal: *“Change of use of farmland and woodland to parkland reserve to include public access and instigation of long-term management and rewilding regime, including establishment of pedestrian and cycle tracks, with new pedestrian and cycle access points off Cuckfield Road to the south and Staplefield Road to the north. Proposals to include the addition of two wooden viewing platforms and two hides. Sports pitches at Beech Farm Field to remain in sports use.”*

1.2 The comments on the above applications *“are made below following a review primarily of ‘ES Volume 3: Landscape and Visual Impact Assessment November 2023,’ and ‘ES Volume 3: Addendum to Landscape and Visual Impact Assessment December 2023’.* The review also included *“a site visit made by the landscape consultant on 13/12/2023.”*

1.3 In addition to the above, Louise Hooper Landscape Architect has produced *“A Summary of Landscape and Visual Impacts (January 2024)”* on behalf of Cuckfield Parish Council, which has been submitted as a consultee response in relation to planning application DM/23/2866.

1.4 As a result of the feedback received, ES Volume 3: Landscape and Visual Impact Assessment November 2023, and ES Volume 3: Addendum to Landscape and Visual Impact Assessment December 2023 have been updated to address these comments wherever possible.

1.5 This report provides a collated summary of all comments received, identifying those that have been addressed within the updated LVIA and Addendum as well as those that haven't. Where it has not been possible to address a specific comment, an explanation has been provided.

2.0 DM/23/2866: Land East of Ansty – Summary of Response to Place Services’ Landscape Advice

2.1 Table 2.1 below sets out fabrik’s response to each comment made by Place Services in their response to Application DM/23/2866: *“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.”*

2.2 The Place Services response begins with a summary, which is quoted below:

“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.”

2.3 The summary points are detailed within the main body of the response and therefore are responded to in detail in Table 2.1 below.

Table 2.1: Summary of fabrik Response to Place Services' Landscape Advice in relation to DM/23/2866

Fabrik comment reference number	Place Services' Landscape Advice in relation to DM/23/2866	Fabrik response to Place Services' comment (addressed/not addressed + explanation)
Planning Context		
2.1	<p>Ansty, Staplefield and Brook Street Neighbourhood Plan (2017) <i>"The proposals are currently contrary to the adopted local development plan.</i></p> <p><i>Ansty, Staplefield and Brook Street Neighbourhood Plan (2017)</i> <i>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".</i></p> <p><i>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."</i></p>	<p>The proposed development would see the expansion of Ansty in an easterly direction, including to the north east and south east. The Local Gap between Ansty and Cuckfield is defined indicatively with a two-way arrow on the Proposals Map in the Ansty, Staplefield and Brook Street Neighbourhood Plan (2017).</p> <p>The spatial arrangements of the proposed development have retained an open aspect to the A272 through the retention of open fields of a minimum 60m in width and the positioning of the school playing fields in closest proximity to the existing village. Whilst development would reduce the physical gap between Ansty and Cuckfield, the open fields, topography and vegetation retained within the site and within the intervening landscape to the north of the A272 and south of Cuckfield maintains the separate identities of the settlements.</p> <p>The northern part of the Site within Cuckfield Parish is identified in the Cuckfield Landscape Character Assessment (HAD, 2012) as Character Area 22: Highbridge to Copyhold Slopes. The Landscape Analysis states that this character area is "Not part of immediate southern setting to Cuckfield, but contributes to wider rural context." and has "No significant strategic separation function other than as part of wider separation between Cuckfield and low density dwellings to the</p>

		<p><i>southeast.</i>” The low density dwellings are considered to be those on Copyhold Lane to the east of the Site.</p> <p>Character Area 23: Cuckfield Southern Slopes Farmland occupies the open land to the south of Cuckfield and north of the A272 and northern site boundary. The landscape analysis identifies that this Character Area also <i>“forms no significant strategic separation function other than preventing coalescence between Cuckfield and low density dwellings to the southeast”</i>.</p> <p>It is therefore considered that the Proposed Development could deliver a sustainable growth strategy for Ansty whilst maintaining an identity that is both physically and perceptually separate to that of Cuckfield, this avoiding any perception of coalescence.</p> <p>Whilst the coalescence point is refuted, it is accepted that the proposed development would cause change to the contextual townscape elements. The LVIA recognises these as Moderate Adverse at Year 15, which are therefore considered to be Significant.</p>
2.2	<p>Cuckfield Neighbourhood Plan (CNP) (2014)</p> <p><i>“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.</i></p> <p><i>Key External Views (Map 5 – Page 33) are identified within the CNP and within the Cuckfield Views Assessment (2012). Since</i></p>	<p>The Key External Views identified within the CNP and Cuckfield Views Assessment (Viewpoint 10 from the Church and Viewpoint 11 from South Street East) are referenced in Section 2.0 of the LVIA and are included within the baseline photographic survey as Viewpoints 15/16 (Church) and 14 (South Street East).</p> <p>The field survey for the LVIA established that there were limited views of the site from these locations due to intervening vegetation.</p>

	<p><i>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.</i></p> <p><i>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.”</i></p>	<p>Viewpoint 14 is from the B2036 and views south are limited by the boundary vegetation along the road corridor. There are glimpsed views across the landscape from the field entrance at viewpoint 14 but this is not a publicly accessible view and therefore the main experience of transient receptors is whilst travelling south along the view corridor. An additional VVM has been produced from this location to demonstrate how the proposed development would be viewed for those receptors. Viewpoints 15 and 16 demonstrate that the boundary vegetation along the church yard and intervening vegetation/built form limit views of the site from the church yard. There are views to the South Downs but the site is not considered to make a significant contribution to the character of this view. It has not been possible to produce a VVM from the churchyard viewpoint due to Cuckfield Parish Council not allowing access to carry out the necessary photography and survey work.</p> <p>The additional VVMs demonstrate that the proposed development is not considered to have significant adverse effects on these identified viewpoints. Given the above, it is considered that the proposed development is not into be in conflict with Policy CNP5 through impacts to these views.</p>
2.3	<p>Mid Sussex Landscape Capacity Study (2007) Hankinson Duckett Associates</p> <p><i>“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</i></p>	<p>The LVIA has accurately referenced the information presented in the published Mid Sussex Landscape Capacity Study (2007) within the baseline assessment. This study has been superseded by the 2014 update as stated and the most recent study has been appropriately factored into the assessment of effects on these Landscape Character Areas as contextual landscape receptors to the proposed development.</p>

	<p><i>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.”</i></p> <p><i>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.</i></p> <p><i>This assessment has however been superseded by the 2014 Study and therefore this is used within the LVIA as a landscape character receptor.”</i></p>	
2.4	<p>Mid Sussex Capacity Study (2014) LUC</p> <p><i>“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</i></p>	<p>The LVIA has accurately referenced the information presented in the published Mid Sussex Capacity Study (2014) within the baseline assessment. Despite the errors in the published evidence base identified by Place Services, the submitted LVIA has considered the potential impacts of the proposed development on these contextual landscape receptors and identifies Moderate Adverse effects on both LCA 51 and LCA 77, which are considered to be significant.</p>

	<p><i>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).</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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</i></p>	
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	<i>the landscape area as a whole and is thus unsuitable for strategic scale development”.</i>	
2.5	<p>Submission draft District Plan – Regulation 19 (November 2023). <i>“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.</i></p> <p><i>The proposals are currently contrary to the Submission draft District Plan – Regulation 19.”</i></p>	<p><i>As identified in the comments, the was previously “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 site was not removed on landscape grounds.</i></p>
Review of Submitted Information		
2.7	<p><i>“The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) undertaken by Fabrik (Volume 3 of the Environmental Statement).</i></p> <p><i>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.</i></p>	<p><i>No response required.</i></p>

	<i>The Site is not located within any designations, although it falls within the setting of an AONB (National Landscape)."</i>	
2.8	<i>"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."</i>	No response required.
2.9	<i>"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."</i>	The detail of the points summarised in this paragraph are responded to on an individual basis against the relevant paragraphs below.
2.10	Landscape Character baseline <i>"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</i>	No response required.

	<p>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.”</p>	
2.11	<p>“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’.”</p>	<p>The LVIA provides a full summary of the key characteristics of NCA 122 and includes the character area as a contextual landscape receptor within the assessment of effects.</p>
2.12	<p>“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</p>	<p>The LVIA provides a full summary of the key characteristics, sensitivities and key issues relating to WSCC LCA HW4 and MSDC LCA10 and includes the character areas as contextual landscape receptors within the assessment of effects.</p>

	<p><i>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’.</i></p> <p><i>The assessment and guidelines emphasise the rich, intimate, tranquil nature of the agricultural landscape and how this needs conservation.</i></p> <p><i>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.”</i></p>	
2.13	<p>Parish Character Assessment: <i>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</i></p>	<p>The LVIA provides a full summary of the key characteristics, sensitivities and key issues relating to Parish LCA22 and includes the character area as a contextual landscape receptor within the assessment of effects.</p>

	<p><i>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.”</i></p>	
<p>Landscape and Visual Impact Assessment</p>		
2.14	<p><i>“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.”</i></p>	<p>The Low – High value range is designed to reflect the large geographic scale of the NCA and the wide variety of landscape features and typologies located within it. Whilst it predominantly covers the High Weald National Landscape, it also includes areas of landscape outside of this designation, a number of settlements, major A Roads and part of the M23 around Crawley and the landscapes associated with these areas. The value judgement is considered to be representative of a large scale character area.</p>
2.15	<p><i>“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”.</i></p> <p><i>In our judgement:</i></p>	<p>Responses to each bullet point are set out below.</p>

	<ul style="list-style-type: none"> • <i>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.</i> • <i>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.</i> • <i>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</i> 	<p>LCA HW4 covers a large geographical area along a broad west – east alignment and includes numerous settlements within its boundary. Settlements include Haywards Heath, Cuckfield, Ansty, Whitemans Green, Bolney, Crabtree, Lower Beeding, Scaynes Hill etc. as well as numerous other small villages and hamlets. At the scale of the character area, the eastern part of the LCA is more densely populated than the central and western parts due to the presence of the railway line and good road links via the A272 and A23. Haywards Heath straddles the railway line and Cuckfield and Ansty are located within the landscape west of the railway line and east of the A23, connected by the A272. Whilst historic in origin, each of these settlements has experienced growth and change. Settlement is therefore considered characteristic of this LCA and particularly the part of the LCA the site is located within. The assessment of effects recognises that the proposed development would alter the character of Ansty through significant growth, but it is considered to be in keeping with the scale of Cuckfield whilst maintaining a separation physically and perceptually.</p> <p>The assessment identifies that the growth of Ansty could be accommodated without significant residual effects to the County level LCA. The site is located within a part of the LCA where settlement is present and the proposed development retains other key characteristics such as the significant woodland cover, gills and networks of lanes, droveways, tracks and footpaths. Whilst it is accepted that there would be some loss of open fields and other perceptual aspects within the Site, at the scale of the county LCA, these are of a small geographic extent, outside of the High Weald National Landscape and therefore not considered to be significant on this contextual landscape receptor.</p>
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	<p><i>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.”</i></p>	<p>The landscape receptors within the Site, including county level key characteristics such as Ancient Woodland are all assessed separately as Site Landscape Receptors. These effects are found to be Significant at a Site level and therefore we believe the LVIA accurately represents the contextual and site level effects on landscape character and landscape features.</p>
<p>2.16</p>	<p><i>“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”.</i></p> <p><i>In our judgement:</i></p> <ul style="list-style-type: none"> • <i>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.</i> • <i>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</i> 	<p>Responses to each bullet point are set out below.</p> <p>The geographic extent of this LCA broadly corresponds to County LCA HW4 but with Haywards Heath excluded. As such the LVIA has adopted the same approach as set out in response to point 2.15 above.</p> <p>The assessment identifies that the growth of Ansty could be accommodated without significant residual effects to the District level LCA. The site is located within a part of the LCA where settlement is present and the proposed development retains other key characteristics such as the significant woodland cover, gills and networks of lanes, droveways, tracks and footpaths. Whilst it is accepted that there would</p>

	<p><i>landscape, the topography in which the proposals are located increases the overall impact of them.</i></p> <ul style="list-style-type: none"><i>• 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.”</i>	<p>be some loss of open fields and other perceptual aspects within the Site, at the scale of the district LCA, these are of a small geographic extent, outside of the High Weald National Landscape and therefore not considered to be significant on this contextual landscape receptor. The landscape receptors within the Site, including district level key characteristics such as Ancient Woodland are all assessed separately as Site Landscape Receptors. These effects are found to be Significant at a Site level and therefore we believe the LVIA accurately represents the contextual and site level effects on landscape character and landscape features.</p>
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<p>2.17</p>	<p><i>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.</i></p> <p><i>In our judgement:</i></p> <ul style="list-style-type: none"> <i>• 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.</i> <i>• 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</i> 	<p>Responses to each bullet point are set out below.</p> <p>The visual assessment within the LVIA identifies that the undulating and well vegetated nature of LCA77 limits views out from the site to the immediate surroundings. Long views over the Low Weald are not considered possible from the Site are open views of the nearby National Landscape are limited. As such the geographic extent of the receptor that would perceived the proposed change is limited and some of the key characteristics identified are not considered to be impacted. The LCA covers a larger extent than just the site and the areas to the south and south west of the Site would not experience change. As such, the judgements set out in the LVIA are considered to be appropriate. The landscape value of this receptor has been judged through the baseline assessment of published documentation and field work. The Medium-High judgement is considered to be an appropriate reflection of the LCA’s character and location outside of the High Weald National Landscape. The LVIA considers this receptor to experience Moderate – Minor Adverse residual effects at Year 15, which are considered to be significant.</p>
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	<i>a substantial part, has a Low/medium capacity for development in landscape terms.”</i>	
2.18	<p><i>“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”.</i></p> <ul style="list-style-type: none"> <i>• 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.</i> <i>• 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.</i> <i>• As per the description for low-capacity development areas, we agree that development would have a significant detrimental effect on the character of this</i> 	<p>The landscape mitigation embedded into the proposed development has avoided any built development to the east of the Waste Water Treatment Works, significantly limiting the perceived change from the central and eastern parts of the LCA. As such the existing character of approximately two thirds of the LCA would be retained. An additional VVM viewpoint from PRow 9CU within this LCA on the eastern boundary of the Site has been produced to demonstrate this. As with any greenfield site, there would inevitably be harm at the site level as a result of the change to built development and associated green and blue infrastructure. The LVIA has identified significant adverse effects to Parish LCA 22 due to built development proposed within the western part of the LCA (approximately a third of the whole LCA) as this is considered to be an appropriate assessment of the effects on this contextual landscape receptor.</p> <p>Effects on the settings of Ansty and Cuckfield are described as part of the contextual townscape receptors. The relationship between the Site</p>

	<p><i>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.”</i></p>	<p>and the High Weald National Landscape (AONB) is described in detail within the LVIA and effects are described separately.</p>
2.19	<p><i>“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.</i></p> <ul style="list-style-type: none"> <i>• 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.”</i> 	<p>The Proposed Development sits outside of the High Weald National Landscape. The visual assessment within the LVIA baseline demonstrates that there is limited visual connectivity between the Site and the National Landscape and the assessment of views from within the High Weald National Landscape is already included within the LVIA.</p> <p>The LURA Act Section 245 does not refer to the setting of National Landscapes. An assessment against the special qualities of the National Landscape has not been included within the LVIA as the Site and surrounding landscape to the east or south sit outside of the National Landscape boundary. There was a historical application by MSDC in 1987 to extend the National Landscape boundary to include a circa 4km2 to the south east of the existing High Weald boundary. This extension included the Site and surrounding landscape. The application was refused and the boundary not extended. Therefore the contextual landscape and site landscape receptors assessed in the LVIA are considered to appropriately assess the key characteristics of the site and surrounding landscape, including the National Landscape. The visual baseline and assessment also provides an assessment of the visual impact on views from the National Landscape, which are not considered to be significant.</p>
2.20	<p>Visual Amenity</p> <p><i>“The LVIA has been supported by 47 Photographic Viewpoints selected based on a range of representative views from within the</i></p>	<p>The annotated extent of the Site is included on all external photos. Some panoramas are presented across a double page spread and</p>

	<p><i>study area and includes publicly accessible routes within the Site (Figure 4.14).</i></p> <p><i>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.”</i></p>	<p>therefore should be viewed in two page mode for full digital representation.</p> <p>We accept that the photographs have not been presented as stipulated by LI guidance for printed images. This was to ensure the photographic survey was integrated into the main body of the LVIA to aid accessibility for the majority of readers, who are anticipated to access this material digitally.</p> <p>We would be happy to provide the full photographic survey in accordance with LI TGN 06/19 upon request.</p>
2.21	<p><i>“Whilst the visual baseline is broadly in keeping with GLVIA3 we have queries and issues in elements of the approach as follows:</i></p> <ul style="list-style-type: none"> <i>• <u>Range and location of viewpoints:</u> 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...</i> <p><i>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.”</i></p>	<p>Additional viewpoints have been added to the LVIA to address these comments.</p> <p>PRoW 62CR – three additional viewpoints have been added to the visual assessment broadly reflecting the locations of site photographs S3, S22 and S24.</p> <p>Southeast corner of the Site – Viewpoint added from PRoW 72CR adjacent to the Site boundary and close to the location of site photograph S32.</p> <p>PRoW 72CR/73CR – Photograph from PRoW 72CR to north east of photograph 32 added to address this comment</p> <p>Viewpoint 27 – Site Photograph S17 provides a representative image of the northwest facing view from this location. An additional photograph has been added to demonstrate the west facing view from the field parcel to the south of the hedgerow boundary to address this comment.</p>

<p>2.22</p>	<ul style="list-style-type: none"> • <i>“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.”</i> 	<p>The images referenced have been included for the following reasons:</p> <p>VP11 and VP12: VP11 and VP12 form part of a series of representative photographs from the B2036 to the roundabout with the A272 to demonstrate how the character of the journey evolves for those transient receptors travelling south along the B2036. VP11 represents the view for both pedestrians and vehicle users on approach to the A272 roundabout. VP12 is representative of the view from the A272 and the pedestrian route adjacent to the roundabout, therefore completing the sequential series from the B2036 and transitioning into the sequential combination of photographs for the A272 adjacent to the western boundary of the Site (to be read with VP5, VP6, VP8, VP9 and VP10).</p> <p>VP23 and VP24: VP23 and VP24 form part of a sequential set of representative viewpoints from PRoW 9CU with VP22. VP23 is representative of the open views across the north eastern part of the Site towards the High Weald National Landscape. VP24 is representative of the more enclosed section of the route to the north east of the Site on approach to the existing woodland. These viewpoints demonstrate the range of sequential views experienced from the length of the route, of which the significance of effects are judged in accordance with GLVIA3.</p> <p>VP34, VP35 and VP36: VP34, VP 35 and VP36 can be generally grouped as having similar views from the landscape to the south of the Site, they have been included as single representative viewpoints from three separate PRoWs (PRoW 78CR, 79CR and 80CR) to provide a comprehensive assessment of the PRoW network to the south of the Site given their proximity to the Site boundary.</p>
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2.23	<ul style="list-style-type: none"> • <i>“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’.”</i> 	<p>VPs 3,4, 27,28,29,30,31,32 are taken from within the Site and therefore the whole image is of the Site and the extent of the Site is not considered necessary to show. The photo captions describe the location of the viewpoint within the site but further clarification has been added to address this point.</p> <p>VPs 6,7,10,11,13,20,21,22,24,25,26,34,38 are presented across a double page spread and therefore the red line does not stop at the photograph edge, but continues across the page. We accept that the photographs have not been presented as stipulated by LI guidance for printed images. This was to ensure the photographic survey was integrated into the main body of the LVIA to aid accessibility for the majority of readers, who are anticipated to access this material digitally. The LVIA should be viewed in two-page view to address this issue. The revised LVIA has been updated to ensure it opens in two page view as default.</p> <p>We would be happy to provide the full photographic survey in accordance with LI TGN 06/19 upon request. A summary of the technical equipment used to capture the photography has been added to Section 3.4 and Methodology statement for the VVMs Appended.</p>

	<ul style="list-style-type: none"> • <i>“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).”</i> 	The values of each of the views have been reviewed and additional clarification has been added to address these comments where considered necessary.
2.24	<p>Visual Impact Assessment</p> <p><i>“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.</i></p> <p><i>We have the following comments in relation to the description of the development and the information within the parameter plans:”</i></p>	No response required.
2.25	<p><i>“<u>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</u></i></p>	<p>This information is provided within the Design and Access Statement and the Design Code submitted with the planning application.</p> <p>The National Landscape (AONB) buffer is to be a minimum width of 60m adjacent to the National Landscape boundary as set out on Page 27 of the Design Code. This is identified as landscape character area 5 “retained and enhanced landscape”. Design Code LN11 sets the following rules:</p>

	<p><i>features (such as a shaws where appropriate) and this should also be fully described.”</i></p>	<p><i>“LN11 - RETAINED & ENHANCED LANDSCAPES</i></p> <ul style="list-style-type: none"> <i>• Retain Valuable Landscapes: Existing trees, hedgerows, Ancient Woodland and species-rich grasslands must be preserved and protected within these areas</i> <i>• Enhanced Landscapes: Where appropriate, enhancement to the existing landscapes should be considered in co-ordination with an ecologist</i> <i>• Limited Access: Access must be limited to these valuable areas to ensure minimal disturbance to wildlife and flourishing flora</i> <i>• A maintenance and management strategy must be set out for these areas with long-term stewardship plans to ensure longevity”</i> <p><i>These areas would be free from buildings and structures in line with the Parameter Plans, but would include surfaced pedestrian/cycle paths to allow access to the Parkland Reserve. Footpath surfaces would be bound gravel and rural in character.</i></p>
<p>2.26</p>	<p><i>“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.”</i></p>	<p><i>Please refer to the Parameter Plans printed to their intended scale and Page 27 of the submitted Design Code for further detail. Quote below:</i></p> <p><i>“Landscape buffers to be a minimum as follows:</i></p> <ol style="list-style-type: none"> <i>i. 60m (adjacent to high weald aonb)</i> <i>ii. 20 m (adjacent to ancient woodland)</i> <i>iii. 10m (from non-ancient woodlands and key site boundaries)</i> <i>iv. 8m (from plantation woodlands, watercourses and significant hedgerows)</i> <i>v. 4-5m (from minor landscape features and hedgerows)”</i>
<p>2.27</p>	<p><i>Amenity greenspace: where this adjoins existing established natural and/or established vegetation including woodland the minimum width and character of the amenity greenspace needs</i></p>	<p><i>Please refer to the Parameter Plans printed to their intended scale alongside the submitted Design and Access Statement and Design Code for details relating to these points.</i></p>

	<p><i>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.”</i></p>	
2.28	<p><i>“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.”</i></p>	<p>The provision of the associated sports facilities and the implications on landscape character and views from private and public receptors has been appropriately considered as part of the Landscape and Visual Impact Assessment.</p>
2.29	<p><i>“SuDS/Drainage: There needs to be a specific indicative SUDs/surface drainage parameter plan identified at this outline stage”.</i></p>	<p>The indicative locations of SuDS features are identified on the Green Infrastructure Parameter Plan. These locations have been informed by the submitted FRA and Outline Drainage Strategy (Yellow Sub Geo, July 2023) and the parameter plans have been drawn to ensure the layout can accommodate the identified volumes of water required. Page 74 of the DAS and Design Code LN13 (page 44 of the Design Code) sets out key design rules for SuDS and amenity landscapes.</p>
	<p><i>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</i></p>	<p>The Access and Movement Parameter Plan has been added to the LVIA and the description of the proposed development expanded to address the points raised. These details have been submitted within the DAS and Design Code. Streets are to be tree lined in accordance with the NPPF. Please refer to Section 4 of the Design Code for further detail.</p>

	<i>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.”</i>	
2.30	<p>Verified images</p> <p><i>“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.”</i></p>	<p>Additional clarification has been added to the LVIA to reference the relevant baseline images for each VVM.</p> <p>Four additional VVMs have been added to the assessment to address the comments received.</p>
2.31	<i>“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.”</i>	No response required.
	<i>“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</i>	Additional VVMs have been produced to provide a wider range of viewpoints to address these comments, including an image from the PRoW network within the Site and one from PRoW 9CU on the eastern boundary. Additional justification for the locations chosen has also been added.

	<i>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.”</i>	
2.32	<i>“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.”</i>	The VVMs have been produced in line with TGN 06/19. The Verified Images represent the proposed building height parameters and do not include the relevant details of the roofscape. As such the VVMs present the worst case scenario at the outline stage. Detailed design would be able to demonstrate a more visually porous roofscape with more recessive building materials. The intentions for which are set out in the Design Code to inform future Reserved Matters applications.
2.33	<i>“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.”</i>	Verified Image 1 is from PRow 6aCU to the north east of the Site. This viewpoint was chosen as a representation of the open views towards the South Downs National Park from the PRow network on the southern edge of Cuckfield and corresponds to Viewpoint 17 from the baseline assessment. The comments identify that the proposed development is at “Year 1 set down in the landscape but still with the roofscape visible below the horizon.” The mitigation measures embedded within the masterplan relating to the spatial arrangement of land uses and the building height parameters have all been informed by the LVIA baseline to ensure the proposed development remains below the tree line on the central ridge within the site. This is in keeping with the existing built form in Ansty visible from this location, which is set below the tree line. The LVIA accepts that the scale of the proposals would result in significant change. We challenge the assertion that the “proposed mitigation is not effective from this viewpoint” as this only

		considers secondary mitigation and tree planting, which is not intended to hide all development. The LVIA identifies significant visual effects for receptors using this route at Construction, Year 1 and Year 15 and is therefore considered to accurately represent the potential effects of the proposed development on receptors using PRoW 6aCU.
2.34	<i>“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.”</i>	The LVIA considers effects for transient receptors using the B2036 to be Moderate Adverse during construction, reducing to Minor Adverse at year 1 and Year 15. As part of the sequential visual assessment of receptors using the B2036 between the A272 roundabout and Cuckfield (Viewpoints 11 – 14), Verified Image 2 (Viewpoint 12) supports this assessment, as it demonstrates the change in view from the southern section of the route, where views of the proposed development are most readily perceived. This is a short section of the overall route and therefore visual effects for receptors using the B2036 are not considered to be significant overall. The Verified Image represents the proposed building height parameters and does not include the relevant details of the roofscape. Breaking up the roofscape in this location would be a key consideration for any future Reserved Matters application, in accordance with the submitted Design Code.
2.35	<i>“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</i>	Verified Image 3 is representative of Viewpoint 8 within the baseline assessment. This viewpoint forms part of the sequential views of the Site for receptors travelling along the A272. Whilst the proposed development would result in landscape change to this specific viewpoint, this is balanced alongside the lesser effects to other views from the A272 to assess the overall visual effect on transient receptors using this route.

	<i>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.”</i>	
2.36	<i>“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.”</i>	Verified Image 4 is representative of Viewpoint 33 in the baseline assessment. This image has been chosen as a representation of the predicted visual effects from the dense network of PRowS in close proximity to the southern site boundary. The Verified Image illustrates that the proposed development would site below the existing boundary tree belts via the illustration of a red wireline roofscape. This image has been included to demonstrate the limited visual impact of the proposed development from receptors to the south of the Site in the interests of accurately depicting the visual effects from all directions relative to the Site. The image supports the LVIA’s assessment that effects from the PRow network to the south of the Site are not significant.
	“Review of assessment of Visual Effects Residents: <i>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.</i>	The value of all residential receptors are identified as High within the LVIA, as stated in Table V3.2.3. It has not been possible to take representative photographs from within the curtilage of private properties and therefore the visual assessment is only able to present photographs from publicly accessible locations, or from within the site. The susceptibility to the proposed change of these private residential receptors varies depending on their anticipated views of the proposed development given the property’s proximity to the site, its topographical positioning, the nature of the view available (open/partial/truncated) and the part of the proposed development impacting that view. As such 6 residential receptors are predicted to experience significant adverse effects as a result of the proposed development during at least the construction phase, with four receptors

	<i>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.”</i>	experiencing significant adverse effects at year 1 and three experiencing significant adverse effects at year 15.
2.37	<i>“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.”</i>	The assessment of this effect has been reviewed and adjusted within the updated LVIA to establish Major – Moderate Adverse effects at Year 1, rather than Moderate.
2.38	<i>“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</i>	Transient receptors are assessed sequentially to provide an assessment of the visual effects experienced across the full length of the route. These inform judgements on significance of change for the experience of the route as a whole. Verified View 3 demonstrates impact from one location along route. Effects need to be balanced across the full experience of change from the route. Whilst one viewpoint may give rise to a significant change, it is important for an LVIA to establish if this affects a significant proportion of the route or not. 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

	<p>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."</p>	<p>appropriately assess the visual impacts on transient receptors travelling along the A272 and on the vegetation cover within the site.</p>
2.39	<p>"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."</p>	<p>The value of the view has been updated to reflect this comment. Views of the National Landscape from this location are limited by the boundary vegetation along the western edge of the A272. Therefore the National Landscape is considered to have limited influence on the value of this view from the A272. The viewpoint forms part of a sequential assessment of receptors using the A272. Viewpoint 8 is representative of the open views from this particular section of the A272 but must be considered alongside the views from viewpoints 1, 5, 6, 9, 10, 26 and 18. The magnitude of effect is considered to reduce between year 1 and year 15 due to the growth of existing and proposed vegetation increasing the screening of the proposed development in that time from the sections of the route with open views of it. Additional VVMs from the same viewpoint are not considered necessary above providing additional views from a greater number of viewpoints in response to other comments received. As such the LVIA is considered to have appropriately assessed the visual effects on receptors using the A272.</p>
2.40	<p>"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</p>	<p>Cuckfield Cricket Club has been assessed as a receptor with reference to VP13 in the submitted LVIA. Receptor value and sensitivity are identified as medium – high with a low – negligible magnitude of effect. This leads to Minor Adverse – Negligible effects on the users of Cuckfield Cricket Club. The description of the change is: "The users of Cuckfield Cricket</p>

	<p><i>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.”</i></p>	<p><i>Club have open views from the Pitches south towards Ansty. However, views of the site are Generally truncated by the intervening vegetation along The B2036 and A272 corridors. The existing open character of the pitches set within an agricultural landscape would be retained. There may be partial, glimpsed views of the construction activity during the winter months but the Sports ground is not as well used during the off season. Upon completion the landscape proposals would provide a further layer of intervening vegetation.”</i></p> <p>Effects on the transient receptors using the B2036 are assessed separately, including Viewpoint 13 – see row 2.34 above.</p>
2.41	<p><i>“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.</i></p>	<p>The value of VP 41 has been adjusted to Medium.</p> <p>These viewpoints form part of a sequential assessment of receptors using the B2036. Viewpoints 40 and 41 are representative of the semi-open views from the section of the B2036 adjacent to the south western boundary of the site from where to southern access would be taken. As part of the assessment of Susceptibility and Magnitude of effect, these views are considered alongside the views from viewpoints 11 -14 and 38. The magnitude of effect is considered to reduce between year 1 and year 15 due to the growth of existing and proposed vegetation increasing the screening of the proposed development in that time from the sections of the route with open views of it. As such the LVIA is considered to have appropriately assessed the visual effects on receptors using the B2036.</p>

	<i>The Significance of Effect remains moderate adverse in our judgement.”</i>	
2.42	<p>Transient from PRow</p> <p><i>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.</i></p>	<p>The proposed school playing fields are located on the opposite side of the hedgerow in VP3, retaining the open character and aspect of the route and views to Cuckfield Church, setting development away from the PRow and Ansty. School buildings would be partially visible down the hill and in the middle distance. The key characteristics of the view are considered to be retained and sizeable is therefore considered a reasonable judgement of the scale of effect in this location. It is accepted that the change to VP4 could be substantial but the PRow would be retained within a significant green corridor. Viewpoint 30 would also be retained within a green corridor but would experience views of residential development which would be a significant change to the view. Additional viewpoints have been added from PRow 62CR as set out in point 2.21 above. A sequential approach to the assessment of effects from the series of views experienced along this route has resulted in Major Adverse effects at construction reducing to Major – Moderate adverse at Year 1 and Moderate Adverse at Year 15. The LVIA is considered to have appropriately assessed the significance of effects experienced by receptors using this route.</p>
2.43	<p><i>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.</i></p>	<p>The sequential assessment of views experienced from PRow 65CR demonstrates that there are open views of part of the central field parcel from the section of the PRow to the south of Mackrell’s Cottage and north of PRow 62CR (VP28). The route is set down from the field with a substantial hedgerow creating a strong boundary feature. The parameter plan demonstrates that the proposed development is set back from this hedgerow with SuDS features set between the route and the residential parcels. Despite this residential development would be</p>

		<p>visible from this section of the route. The northern section of the route passes Mackrell's Cottage within woodland and descends steeply down to the watercourse. Views of the proposed development are limited from this location. Despite this the access and movement parameter plan demonstrates that this section of the route is to be realigned onto the proposed bridge to enhance the accessibility and useability of the route. On balance of the experience from the full length of the route and the realignment, the assessment set out within the LVIA has been updated to provide a more appropriate reflection of the proposed change.</p>
2.44	<p><i>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.</i></p>	<p>VVM to be provided to demonstrate extent of change. No development proposed around these routes. No junction with PRoW 73CR on definitive map. Chosen location provides longer distance view across site to Cuckfield Church and National Landscape. Landscape mitigation precludes development in this location and proposed development includes these routes within a retained and enhanced landscape, informed by the ecological assessment which identified these fields as of high value for their grassland habitats. Therefore the assessment of effects presented within the LVIA is considered to be representative of the change experienced by receptors using these routes.</p>
2.45	<p><i>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.</i></p>	<p>Susceptibility to the <u>proposed change</u>. Lack of intervisibility with the site means susceptibility judgement reduced. VVM 4 from viewpoint 34. VP19 not considered appropriate for VVM as Copyhold Lane is well enclosed by dense vegetation and field assessment established that views of the site are truncated by intervening vegetation for receptors using this route. As an alternative, a new VVM has been produced from viewpoint 23 on PRoW 9CU as this route has open views in a westerly</p>

		direction across the northern section of the site towards the High Weald National Landscape from adjacent to the north eastern site boundary.
2.46	<i>“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.”</i>	VP17 does correspond to VVM1. Image details updated to clarify this. This image informs the professional judgements on the susceptibility/magnitude and significance of effect for receptors using PRow 6aCU. VP17 is representative of the long distance, open views from the route, but these views are only available for circa 30% of the route. The remaining 70% has a more enclosed character with limited views of the Site. Year 1 – Year 15 effects reduce from Moderate Adverse to Moderate – Minor Adverse, this is considered appropriate given the growth of existing vegetation (which cannot be represented in the VVM) and the proposed vegetation, as well as the weathering of built form materials. Nighttime effects have been assessed generally as part of the site landscape receptors. VVMs do not show nighttime effects but have informed consideration of professional judgements.
2.47	<i>“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.”</i>	The proposed lighting strategy is set out in the DAS and Design Code. The sports facility would be flood lit and this has been factored into the assessment of visual effects and night time character.
2.48	<i>“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.”</i>	VP 13 has been chosen as an additional VVM viewpoint location as it is representative of the identified Neighbourhood Plan View 10. VVMs will demonstrate daytime effects only which is consistent with standard best practice in line with GLVIA3. Professional judgements have been used to establish nighttime effects. Any visualisation of night time effects is the remit of the lighting assessment and therefore it is considered appropriate for the VVMs to focus on daytime effects only.
Conclusion		

<p>2.49</p>	<p><i>“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.”</i></p>	<p>The LVIA considers that, as with the development of any green field site, there would be some significant adverse landscape and visual effects arising as a result of the Proposed Development during construction, at Year 1 and Year 15, which are considered to be the residual effects. The Proposed Development is considered to form an easterly extension of Ansty and is confined to the south of the A272 behind retained vegetation and a green corridor. Therefore the Proposed Development does not lead to any actual or perceived coalescence with Cuckfield due to the intervening agricultural landscape on rising ground remaining open and undeveloped and for the reasons set out in response to the points above.</p> <p>A number of receptors within the High Weald National Landscape (formerly AONB) have been assessed to inform an overall judgement of the effects of the Proposed Development on setting to the AONB. The LVIA concludes that there would be Minor Adverse residual visual effects on the setting of the AONB due to the role of the topography and vegetation in filtering and screening views of the Proposed Development from publicly accessible locations within the AONB.</p> <p>The errors and omissions identified have been fully responded too throughout this Rebuttal and an updated LVIA has been submitted to address these points where considered appropriate. We do not consider that the LVIA underplays the effects of the proposed development but has given fuller consideration to the wide range of embedded and secondary mitigation measures that would help to minimise the landscape and visual effects of a proposed development that could deliver significant benefits for the local community of Ansty.</p>
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3.0 DM/23/2866: Land East of Ansty – Summary of Response to Place Services’ Landscape Advice

3.1 Table 2.1 below sets out fabrik’s response to each comment made by Place Services in their response to Application DM/23/2867: *“Change of use of farmland and woodland to parkland reserve to include public access and instigation of long-term management and rewilding regime, including establishment of pedestrian and cycle tracks, with new pedestrian and cycle access points off Cuckfield Road to the south and Staplefield Road to the north. Proposals to include the addition of two wooden viewing platforms and two hides. Sports pitches at Beech Farm Field to remain in sports use.”*

3.2 The Place Services response begins with a summary, which is quoted below:

- *“We agree with the judgement that it is likely that the proposals in themselves will have minor adverse or negligible impacts on the Site in terms of landscape character or visual effects.*
- *The proposals could contribute to the objectives of the High Weald AONB Management Plan, but a detailed management plan and details of proposed governance and funding models are needed to demonstrate this*
- *It is understood that the premise of the parkland reserve is reliant on the approval for the neighbouring residential application of the 1450no. dwellings under DM/23/2866. In that context, the proposals are not acceptable.”*

3.3 The summary points are detailed within the main body of the response and therefore are responded to in detail in Table 3.1 below.

Table 3.1: Summary of fabrik Response to Place Services' Landscape Advice in relation to DM/23/2867

Fabrik comment reference number	Place Services' Landscape Advice in relation to DM/23/2867	Fabrik response to Place Services' comment (addressed/not addressed + explanation)
Planning Context		
3.1	<p><i>“Mid Sussex District Plan (MSDP) (2018)</i> <i>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, with regard to this proposal, the following policies are particularly relevant:</i></p> <ul style="list-style-type: none"> • <i>Policy DP12: Protection and Enhancement of Countryside</i> • <i>Policy DP16: High Weald Area of Outstanding Natural Beauty</i> • <i>Policy DP26: Character and Design</i> • <i>Policy DP34: Listed Buildings and Other Heritage Assets</i> • <i>Policy DP37: Trees, Woodland and Hedgerows</i> • <i>Policy DP38: Biodiversity”</i> 	No response required.
3.2	<p><u><i>Ansty, Staplefield and Brook Street Neighbourhood Plan (2017)</i></u> <i>The Site largely lies within the Ansty, Staplefield and Brook Street Neighbourhood Plan area, which was formally made on 2nd February 2017. Policy AS3 High Weald Area of Outstanding Natural Beauty is relevant to this application considering its location within the AONB. Proposals must [inter alia] conserve and enhance the natural beauty of the AONB, meet the objectives</i></p>	No response required. Policy AS3 is covered in the main LVIA policy section, which is relied upon by the Addendum.

	<p><i>of the AONB Management Plan, and must provide an assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.</i></p>	
3.3	<p><u>Cuckfield Neighbourhood Plan (CNP) (2014)</u> <i>Whilst the majority of the site lies within the Ansty, Staplefield and Brook Street Neighbourhood Plan Area, part of the eastern edge of the Site is located within the CNP Area.</i></p> <p><i>Key External Views (Map 5 – Page 33) are identified within the CNP and within the Cuckfield Views Assessment (2012). View 2 (Whitemans Green Recreation Ground), View 12 (Brighton Road – West across Cuckfield Park) and View 13 (Cuckfield Park) provide long views towards the Site and across to the ridge of the South Downs National Park. The Site does however benefit from extensive internal and boundary vegetation which restricts views into the Site although does allow long views from higher elevation across to the South Downs ridge.</i></p>	No response required.
3.4	<p><u>High Weald AONB Management Plan (2019-2024)</u> <i>A number of objectives identified in the AONB Management Plan relevant to the application include:</i></p> <ul style="list-style-type: none"> <i>• S1: To reconnect settlements, residents and their supporting economic activity with the surrounding countryside.</i> <i>• S2: To protect the historic pattern and character of settlement.</i> <i>• R1: To maintain the historic pattern and features of routeways.</i> <i>• R2: To enhance the ecological function of routeways.</i> 	No response required.

	<ul style="list-style-type: none"> • <i>W1: To maintain the existing extent of woodland and particularly ancient woodland.</i> • <i>W2: To enhance the ecological quality and functioning of woodland at a landscape scale.</i> • <i>FH2: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.</i> • <i>FH3: To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.</i> • <i>OQ1: To increase opportunities for learning about and celebrating the character of the High Weald.</i> • <i>OQ3: To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty.</i> • <i>OQ4: To protect and promote the perceptual qualities that people value.</i> 	
3.5	<p><u><i>“Submission draft District Plan – Regulation 19 (November 2023)</i></u> <i>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. It is also worth noting that in the Mid Sussex District Council District Plan 2021-2039 Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty (Regulation 19), it is concluded that the impact of the joint development of the</i></p>	<p><i>No response required. The comments relate to Application Number DM/23/2866. Please refer to Table 2.1 for relevant responses.</i></p>

	<p><i>housing and the country park would have a high impact on the AONB (National Landscape).</i></p> <p><i>The Submission draft District Plan – Regulation 19 identifies Ansty as a ‘small village’ in the Settlement Hierarchy.</i></p> <p><i>The proposals are currently contrary to the adopted local development plan and to the Submission draft District Plan – Regulation 19.”</i></p>	
Review of submitted information		
3.6	<p><i>“The application has been accompanied by a Landscape and Visual Impact Assessment (LVIA) undertaken by Fabrik (Volume 3 of the Environmental Statement). An Addendum (December 2023) has also been provided relating specifically to the Beechy Bottom Parkland Reserve which forms part of the Ansty Garden Community.”</i></p>	<p>No response required.</p>
3.7	<p><i>“The assessment should be 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). We would have expected the Type 1 Viewpoint Photographs to be submitted at A1 width. We also note that the ‘approximate extent of the site’ has not been included on all of the submitted Viewpoint Photographs.”</i></p>	<p>The annotated extent of the Site is included on all external photos. Some panoramas are presented across a double page spread and therefore should be viewed in two page mode for full digital representation.</p> <p>We accept that the photographs have not been presented as stipulated by LI guidance for printed images. This was to ensure the photographic survey was integrated into the main body of the LVIA to aid accessibility for the majority of readers, who are anticipated to access this material digitally.</p> <p>We would be happy to provide the full photographic survey in accordance with LI TGN 06/19 upon request.</p>

3.8	<p><i>“The methodology within the LVIA (Appendix V3.1 – Page 112) outlines the approach taken to assessing the potential landscape and visual impacts of the development. We generally agree with the methodology used to undertake the assessment of landscape and visual impact.”</i></p>	<p>No response required.</p>
3.9	<p><i>“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, we are pleased to see the fieldwork and photography has largely been undertaken during winter to ensure that a ‘worst-case scenario’ is being appraised.”</i></p>	<p>No response required.</p>
3.10	<p><i>“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 characteristics are reasonably described and the range of views that are available have been appropriately summarized. However, we consider the assessment itself underestimates the likely effects of the proposed development on landscape character and visual amenity.”</i></p>	<p>The detail of the points summarised in this paragraph are responded to on an individual basis against the relevant paragraphs below.</p>
3.11	<p><u>Landscape character</u> <i>The LVIA assessment of Landscape Character references the National Landscape Character Assessment (NCA 122: High Weald) and Cuckfield Landscape Character Assessment (Area 33 Ridge Top Playing Fields). We would however have expected the inclusion of A Landscape Character Assessment for West Sussex (HW4: High Weald Fringes) and A Landscape Character Assessment for Mid Sussex (LCA10: High Weald Fringes).</i></p>	<p>The Parkland Reserve Site is located within the same County level and District level LCAs as the Ansty Garden Community site. These LCAs are fully described in the main LVIA baseline section and therefore, as with the policy and designations baseline, this information has been relied upon to avoid unnecessary repetition of information.</p>

<p>3.12</p>	<p><u>“County Character Assessment:</u></p> <p><i>At a county level, the Landscape Character Assessment of West Sussex identifies the Site as being located within LCA HW1 High Weald Fringes. Key characteristics of this LCA include the wooded, confined rural landscape of intimacy and complexity, long views over the Low Weald to the downs, significant woodland cover, a dense network of hedgerows and trees, small irregular shaped assart fields and larger fields, network of footpaths and some busy roads.</i></p> <p><i>Key issues within this LCA include the continued amalgamation of fields, 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. Land Management Guidelines include [inter alia]:</i></p> <ul style="list-style-type: none"> <i>• Maintain and restore the historic pattern and fabric of the woodland and agricultural landscape for scenic, nature conservation and recreational purposes;</i> <i>• Protect existing views from the area and avoid skyline development, paying particular attention to the siting of telecommunications masts;</i> <i>• Increase screening of prominent parts of new development on the southern fringes of Haywards Heath;</i> <i>• Seek to protect the tranquil and historic character of rural lanes and manage road verges to enhance their nature conservation value;</i> <i>• Minimise the effects of adverse incremental change by seeking new development of high quality that sits well within the landscape and reflects local distinctiveness.</i> 	<p>The Parkland Reserve Site is located within the same County level (LCA HW4 High Weald Fringes) and District level (LCA 10: High Weald Fringes) LCAs as the Ansty Garden Community site. These LCAs are fully described in the main LVIA baseline section and therefore, as with the policy and designations baseline, this information has been relied upon to avoid unnecessary repetition of information.</p>
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	<p><i>Appendix A (Table A.1 Contextual Landscape Receptors) does not include an assessment of the landscape character impacts on the Landscape Character Assessment of West Sussex. We would have expected this to be included within the assessment.”</i></p>	
3.13	<p><u>“District Character Assessment:</u> <i>At a district level, the Cuckfield Landscape Character Assessment (April 2012) identifies the northern part of the Site as being located within Landscape Character Area (LCA) 33 Ridge Top Playing Fields. Key characteristics of this LCA include; part of the main east-west ridge sloping south, bound by the B1125 to the north, adjoins edge of Whitemans Green, playing fields and recreation ground, extensive views of the South Downs and wider National Park.</i></p> <p><i>The LCA Capacity Summary describes the Site as; large south facing parcels of land with recreational use, open to wider AONB to the south with extensive views across to the South Downs. This LCA has moderate value, major sensitivity and negligible/low capacity which indicates “that development would have a significant and detrimental effect on the character of the landscape. Any development in these character areas should only be on a very small scale and proposals would need to demonstrate no adverse impacts on the setting to the settlement or the wider landscape”.</i></p> <p><i>Within 33 Ridge Top Playing Fields, the LCA is assessed as having moderate value, major sensitivity, and an overall negligible/low capacity for development. Within the LVIA, the LCA is assessed as having medium sensitivity and low magnitude of effect resulting</i></p>	<p><i>The Cuckfield Landscape Character Assessment is the Parish level assessment. As identified in the response, this is fully described and assessed in the LVIA Addendum and no further response is considered necessary as Officers concur with the assessment that the Parkland Reserve proposals would not have a significant impact on this receptor.</i></p>

	<p><i>in a minor adverse – negligible significance of effect. Since the proposals are low level, do not require built development and constitute minor physical change in the landscape, we agree with the judged significance of effect.</i></p> <p><i>Following the identification of landscape character areas, the assessment appraises the landscape susceptibility, landscape value and landscape sensitivity of the Site in Appendix A Assessment of Landscape and Visual Effects. Landscape value is assessed using GLVIA Box 5.1.</i></p> <p><i>Based on the above, we are of the judgement that development within this landscape will not have a significant impact on the local landscape character and therefore agree with the concluding judgements of the LVIA. We do however note the absence of the Landscape Character Assessment of West Sussex within the assessment.”</i></p>	
3.14	<p><i>“<u>Visual Amenity</u> The LVIA has been supported by 9 Photographic Viewpoints selected based on a range of representative views from within the study area and includes publicly accessible routes within the Site (Figure 2.7).”</i></p>	No response required.
3.15	<p><i>“We note that the photography included within the LVIA has not been fully 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. We would also have expected the annotated extent of the site to</i></p>	We accept that the photographs have not been presented as stipulated by LI guidance for printed images. This was to ensure the photographic survey was integrated into the main body of the LVIA to aid accessibility for the majority of readers, who are anticipated to access this material digitally.

	<i>have been included on every submitted viewpoint alongside photographic technical details.”</i>	We would be happy to provide the full photographic survey in accordance with LI TGN 06/19 upon request.
3.16	<i>“Within the LVIA, assessed viewpoints have been assessed as having high value (by virtue of presence within the AONB) and low susceptibility, resulting in medium sensitivity. Receptors have largely been judged to have negligible or no change in significance of effect. Where the significance of effect is judged to be minor adverse from PROW receptors and users of Whitemans Green Recreation Ground, this is owed to the perceived increase in activity within the Site.”</i>	No response required.
3.17	<i>“Considering the type of proposals within the Site, we agree with this judgement and that the perceived changes will likely be owed entirely to the presence of more pedestrian and cyclist activity within the Site.</i>	No response required.
	<i>Whilst there are locations where additional viewpoints would have been useful (i.e. Deaks Lane and longer distance viewpoints), the proposals are low level, small in scale and require minimal changes to the existing and therefore the assessed visual impact on the landscape will likely be minimal. We are therefore satisfied with the viewpoints included within the submitted assessment.”</i>	No response required.
Other Matters		
3.18	<i>“Whilst the proposals in isolation are acceptable in principle and do not result in significant landscape impacts, based on this application’s association and reliance on neighbouring residential development under DM/23/2866 which will cause significant detrimental effects, the proposal is not acceptable from a landscape perspective.”</i>	It is noted that the Parkland Reserve proposals are considered to <i>“not result in significant landscape impacts”</i> and therefore is deemed acceptable in isolation. The objection is based on the association with the proposed development submitted under application number DM/23/2866. The response to the comments in relation to that application are set out in Table 2.1.

<p>3.19</p>	<p><i>“The Mid Sussex District Council District Plan 2021-2039 Assessment of the Impact of the SHELAA Sites on the High Weald Area of Outstanding Natural Beauty (Regulation 19) states of the joint development proposals:</i></p> <p><i>‘As a large site, it impacts on most of the AONB character components. Development of the site would result in the loss of currently undeveloped land, potentially agricultural land or valued grassland. There are waterbodies and watercourses within the site. There are no sandstone outcrops on or adjacent to the site, however, there is underlying sandstone geology on part of the site. There is ancient woodland within the site. The site is in a rural and tranquil area and has dark skies. Staplefield Road to the north of the site is a historic drove route and there are other historic tracks crossing the site along with PROW. The site is associated with Cuckfield Park. Development of this site would lead to coalescence between Ansty and Cuckfield. The northern part of the site is within the High Weald AONB but is not proposed for built development. It is proposed as a country park, however, the creation of a country park may lead to impacts on the AONB. The design and management of the country park must be consistent with the objectives of the High Weald AONB Management Plan.’”</i></p>	<p>The Assessment within the SHELAA was not based on the proposed development submitted as part of Applications DM/23/2866 and DM/23/2867. The issues raised therefore do not consider how the aspects identified have been incorporated into the proposed development.</p> <p>The submitted LVIA and Addendum demonstrate the predicted landscape and visual effects arising from the proposed development. As noted in 3.18 above the proposals within the Parkland Reserve site within the High Weald National Landscape are <i>“not result in significant landscape impacts”</i> and the LVIA Addendum is considered to appropriately assess the impacts on the AONB and key views. The impact on the heritage significance of Cuckfield Park is set out within the Heritage Statement. Its landscape qualities are considered in the LVIA Addendum.</p> <p>The proposed residential development sits entirely outside of the National Landscape boundary, but in close proximity. The LVIA accepts that there would be loss of currently undeveloped land that is in agricultural use. The areas of valued grassland identified by the ecological surveys are retained and enhanced and form a key part of the site analysis and masterplan development as set out in the DAS. All waterbodies and watercourses are retained and enhanced and supplemented with SuDS attenuation features as part of a comprehensive green and blue infrastructure strategy. All Ancient Woodland within the site is retained with minimum 20m buffers kept free from built development as stipulated on the Parameter Plans and in the Design Code. The consideration of impacts on contextual townscape</p>
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		elements, coalescence, rural character and tranquillity are all covered in the LVIA and responded to where required in Table 2.1.
3.20	<p><i>“As this is a full application for change of use (and not part of an outline application) we would expect that details of the anticipated funding and governance model for the proposed country park would be submitted alongside an outline landscape and ecology management plan for the next ten years. Due to the scale of the linked housing development, that it lies in the setting of an AONB (National Landscape) and the parkland is actually within the AONB (National Landscape) we would suggest a Community Management Organisation (CMO) is set up along the lines of the Chilmington Management Organisation in Ashford, Kent www.cmo.org.uk. This CMO takes the form of a community development trust, an independent not for profit organisation with the relevant local authority and parish councils as well as the developer sitting on the board. In the case of Ansty, it would be expected that the AONB (National Landscape) partnership would also have a role. Whilst the Chilmington development is proposed to be up to three times in scale in terms of housing numbers, the same principles apply. An independent environmental organisation with experience of working in this way, such as The Land Trust (https://thelandtrust.org.uk/work-with-us/how-we-work/land-management/) could be employed as part of this process.”</i></p>	<p>A detailed management plan would be secured by planning condition. Details of governance and funding models to be provided separately.</p>
3.21	<p><i>“No additional parking is proposed providing outside access to the parkland reserve. Whilst we recognise that the proposals are designed to be a greenspace associated with the development of DM/23/2866 and that additional parking is not provided on this basis, it is expected that the development of new outdoor</i></p>	<p>The proposed development of DM/23/2866 significantly exceeds the policy requirements for public open space and recreation spaces within that site. The Parkland Reserve is an additional recreation facility that is not required to facilitate the residential development in terms of open space. The Parkland Reserve is intended as a local recreation facility that</p>

	<p><i>greenspace provision will invite dedicated trips via car for dog walking and other purposes. It can therefore be anticipated that the proposed development to the east of Ansty Road will be utilised as parking for access to Beechy Bottom Parkland Reserve along with the existing car-park at the sports ground or indeed along the roadside. This will therefore affect the perceived design and experience of both the new development where additional vehicles that have not been accounted for are likely to be parked on the western edge and the rural landscape beyond. The Toucan crossing proposed for Ansty Road in the planning statement should be a Pegasus Crossing to allow horses to use the existing bridleways in the proposed country park and any bridleways proposed as part of the new development.”</i></p>	<p>is accessible via the existing PRow network, which would be enhanced and expanded. Further consideration can be given to the types of road crossings and wider links to the bridleway network as part of the next stages of planning.</p>
3.22	<p><i>“The proposals provide more access to the High Weald AONB. Whilst this supports some objectives of the Management Plan (i.e. S1, OQ1, OQ3, OQ4), increased access may encourage pedestrian access to the on-site Ancient Woodlands and other sensitive habitats which are currently not at risk of pedestrian harm. Consideration for preventing access to sensitive areas of the Site must be had to ensure that increased access does not impact on Objectives W1 and W2. Increased access also brings increased antisocial behaviour, dog-fouling and littering in all habitats which will need managing.”</i></p>	<p>The Proposed Development within the Parkland Reserve specifies that access to the areas of Ancient Woodland would be restricted, with a focus on woodland walks in other parts of woodland that are not ancient. This aligns with the comments received and all other matters raised are manageable through ongoing maintenance plans.</p>
Conclusion		
3.23	<p><i>“The proposed interventions associated with this application comprise an additional cycle path and circular walking routes, habitat creation, conservation cattle/pigs, recreation fields, multifunctional greenspaces, additional access and ecological protection zones. All proposed features are low level and require</i></p>	<p>No response required.</p>

	<i>minimal built interventions which have a reduced landscape and visual impact on the surrounding landscape.”</i>	
3.24	<i>“We agree with the judgement that the proposals will likely have minor adverse – negligible impacts on the Site in terms of adverse landscape character and visual effects. The proposals could also beneficially contribute to the objectives of the High Weald AONB Management Plan, for example for ecological and recreational benefits. However, without a detailed management plan, and details of governance and funding models this cannot be demonstrated.”</i>	No response required. A detailed management plan would be secured by planning condition. Details of governance and funding models to be provided separately.
3.25	<i>“Notwithstanding the above, it is understood that the premise of the parkland reserve is reliant on the approval for the neighbouring residential application under DM/23/2866. Isolated, the proposals within Beechy Bottom Parkland Reserve are not unacceptable from a landscape and visual impact perspective, however the context of the proposals in their reliance on the approval of the 1450no. dwellings is not acceptable.”</i>	It is noted that the Parkland Reserve proposals are considered to “not result in significant landscape impacts” and therefore is deemed acceptable in isolation. The objection is based on the association with the proposed development submitted under application number DM/23/2866. The response to the comments in relation to that application are set out in Table 2.1.

4.0 DM/23/2866: Land East of Ansty – Summary of Response to A Summary of Landscape and Visual Impacts (Louise Hooper Landscape Architects)

Introduction

- 4.1 Louise Hooper Landscape Architect (LHLA) has prepared the report “A Summary of Landscape and Visual Impacts” in response to Application DM/23/2866. The Notice on Page 2 of the report states: *“This report was prepared by Louise Hooper Landscape Architect (LHLA) solely for use by the client, Cuckfield Parish Council to oppose proposed residential development at Ansty”*. Cuckfield Parish Council have submitted this report as their consultee response. Due to the length of the report, this response does not itemise every statement, but instead provides some general commentary on its scope, methodology and findings.
- 4.2 This consultee response does not provide a critique or challenge to the submitted ES Volume 3: Landscape and Visual Impact Assessment November 2023, or ES Volume 3: Addendum to Landscape and Visual Impact Assessment December 2023. Instead LHLA provide an alternative LVIA. fabrik have reviewed the LHLA LVIA against the Guidelines for Landscape and Visual Impact Assessment 3rd Edition 2013 (GLVIA3), the submitted Parameter Plans, and the submitted ES Volume 3: Landscape and Visual Impact Assessment November 2023. The findings of this review are summarised below, grouped under common headings.

General comments:

- 4.3 The Notice on Page 2 of the report states: *“This report was prepared by Louise Hooper Landscape Architect (LHLA) solely for use by the client, Cuckfield Parish Council to oppose proposed residential development at Ansty”*.
- 4.4 *“LHLA undertook a Landscape and Visual Impact Assessment (LVIA) for the development site in 2022. This report references and summarises baseline evidence from that LVIA. The landscape sensitivity and capacity assessment, selected viewpoints and methodology from that study are included in the Appendices to this report.”*

Methodology

- 4.5 The methodology set out in Appendix 5 does not include a description of the methodology employed in relation to the landscape capacity assessment set out along the sensitivity assessment in Appendix 1. The approach of compartmentalising the site into multiple land parcels is not described and therefore it is not clear how this capacity assessment informs the assessment of landscape impact.

Landscape Baseline Comments

- 4.5 Section 3 sets out the landscape character baseline. Paragraph 2 states that “the proposed development will affect the setting of the HWNL and will be visible from the South Downs National Park”. This is not a matter for the baseline section of an LVIA, which should describe the existing landscape and visual conditions. The consideration of the proposed development and its associated impacts on the baseline should be explained and justified fully once the baseline has been appropriately assessed. These comments are therefore not appropriate at this point in the report. Further explanation is provided under the Impact Assessment heading below.
- 4.6 The baseline identifies that an unsuccessful application was made by Mid Sussex to extend the High Weald National Landscape boundary to incorporate a 4km² area to the east of Ansty and south of Cuckfield, which includes the site. This application was refused and this area does not form part of the High Weald National Landscape.
- 4.7 The boundary of the South Downs National Park is identified as “just over 7km south of the site” The paragraph goes on to state that *“it can be seen from the site and there are views across the site from elevated public viewpoints within the National Park.”* It should be noted that the South Downs National Park cannot be seen from the Ansty Garden Community site (Application DM/23/2866) as demonstrated by the visual assessment set out within the submitted LVIA. There are identified views of the South Downs on the horizon from elevated viewpoints within the Parkland Reserve site (Application DM/23/2867) and from the PRow network and Churchyard on the southern edge of Cuckfield.
- 4.8 Views from the South Downs National Park were scoped out of the submitted LVIA due to the site’s long distance from its boundary and the Negligible contribution it makes to the far reaching, wide panoramic views available from the escarpment.

- 4.9 Section 4 of the baseline covers the planning context. It makes reference to an old version of the NPPF and only provides a brief summary of emerging district level policy. No reference is made to adopted policy at the district or neighbourhood level.
- 4.10 The landscape baseline was recorded in 2022, which exceeds the one year timeframe for baseline assessments considered best practice by GLVIA3. The landscape sensitivity and capacity assessments and visual analysis therefore must be caveated as potentially not representative of the existing baseline conditions. The photographic survey provided in Appendix 2 was carried out in the summer months when deciduous vegetation was in leaf, which also isn't in line with best practice as stipulated by GLVIA3.
- 4.11 The landscape baseline in section 5 identifies a series of "Landscape Description Units" based on a 2022 study, which is not appended to the report. Appendix 1 states these units have been defined by land cover and topography. No methodology for the establishment of judgements relating to landscape capacity is provided in Appendix 5. Appendix 1 sets out the detailed assessments of each Unit. It is noted that the northern fields within the Site are considered to have a "*low sensitivity to change*" and a "*medium/high capacity for change*". Although it is noted the summary table at on page 42 say "medium capacity". All other LDUs are judged to have either a Low, Low/Negligible or Zero capacity for change. Generally, the agricultural fields are judged as low or low/negligible and the woodlands and watercourses are judged as zero.
- 4.12 The Views, Viewpoints and Visual Receptors part of Section 5 identifies a series of representative viewpoints for the site, which are then presented in Appendix 2. The location of the view identified as viewpoint 11 within the Parkland Reserve is questioned as at the time of the field work for the LVIA, the PRow in this location was identified as set through the edge of the woodland and views of the site were considered to be truncated. The image presented as Viewpoint 11 appears to be taken from higher up the hill, which is not a publicly accessible location. Viewpoint 8 identified on Figure 9 is from Jack and Jill Windmills in the South Downs National Park. The annotations on the image in Appendix 2 identify "Cuckfield Church" "Cuckfield Place" and the location of "Proposed 1600 homes". These labels are incorrectly named as the proposed development is for 1,450 homes and it is assumed that "Cuckfield Place" should be Cuckfield Park. It is also believed that these labels are incorrectly located in the view. Cuckfield Church is approximately 11km north of Jack and Jill Windmills with the centre of the site approximately 9.85km from this view point. The settlements of Ditchling/Keymer/Hurstpierpoint and Burgess Hill all sit within the intervening landscape between the viewpoint and the site. The labels demonstrate no intervening settlement and appear too close to the viewpoint to be Cuckfield Church and the site. Our assessment anticipates

that the church spire identified is actually that of the Holy Trinity Church in Hurstpierpoint, approximately 2km from the viewpoint. The baseline assessment of views from the South Downs National Park is therefore considered to be incorrect and undermines the judgements made in the assessment of effects.

Description of the Proposed Development and Embedded Mitigation

4.13 The description of the proposed development is limited. The site boundary, illustrative masterplan, constraints and opportunities plan and building heights parameter plan are referred to. Detailed descriptions of the proposed development and the embedded mitigation are not provided and therefore it is not possible to reach a balanced judgement in the assessment of effects.

Impact Assessment

4.14 Section 7 presents a summary of the landscape impact with reference to more detailed tables in Appendix 3. The summary is considered to present an incorrect analysis of the scheme's impacts on Ancient Woodland, the High Weald National Landscape and the South Downs National Park. The Landscape Description Units and methodology elevate the harm to individual landscape elements and do not factor in the proposed landscape character areas and mitigation measures proposed. For example, areas of retained landscape with no development and minimal intervention such as LDU4 are identified as having a Moderate Adverse impact. The submitted LVIA accepts that there would be significant adverse effects to parts of the site characteristics as a result of the proposed development given that it is a greenfield site. However, the Proposed Development has sought to minimise these effects through the embedded landscape mitigation and green infrastructure proposals, including a significant increase in tree planting within the site. This assessment does not consider the landscape proposals in the judgement of effects.

4.15 The assessment of effects on the landscape fabric outside the site (High Weald National Landscape, South Downs National Park and Cuckfield Conservation Area) are considered to elevate the level of harm caused by the proposed development, and in the case of the South Downs National Park, the described effects are visual effects but within the landscape effects section. As described above, the assessment appears to misrepresent the visual relationship between the identified viewpoints and the site. The effects on the South Downs National Park should therefore be discounted.

4.16 Section 8 sets out the visual impact and Figure 15 demonstrates a limited Zone of Likely Visual Influence (ZLVI). This is a much narrower area than that identified in the submitted LVIA and is inconsistent with some of the photo locations in Appendix 2. For example the location of Viewpoint 11 is within an area of the ZLVI where the site is not considered to be visible with the area of land higher up the hill to the north (not publicly accessible) considered likely to have views of the site. Incorrect analysis of visual impacts from a number of receptors that should be challenged. The identified visual effects from the High Weald National Landscape and Cuckfield Conservation Area are considered to have elevated the significance and do not accurately represent the full experience of receptors using routes within these areas, where views of the site are limited. As such these judgements are challenged.

Conclusions

4.17 The LHLA LVIA does not critique the findings or methodology of the submitted LVIA. The conclusions of the LHLA LVIA state *“The proposals would damage, degrade and destroy large swathes of valued and sensitive landscape including ancient woodland, ghyll stream and historic field boundaries”*. The proposed development retains all ancient woodland, ghyll streams and whilst there are some minor losses of field boundaries, these are retained as part of the proposed development wherever possible. The conclusion references out of date national planning policy and states that “new development resulting in the loss or deterioration of irreplaceable habitats such as Ancient Woodland or Ancient/Veteran Trees should be refused” without identifying that there is no loss or deterioration of these features/habitats as set out in the submitted Arboricultural Impact Assessment, Landscape and Visual Impact Assessment and Ecological Assessments. The assessment of effects on the South Downs National Park are considered to be incorrect and effects on the High Weald National Landscape and Cuckfield Conservation Area are elevated in comparison to the LVIA submitted with the planning application. Full consideration has not been given to the landscape mitigation measures and enhancements proposed as part of the proposed development and these therefore have not informed the assessment of effects.