

Additional Representation – Verified View 02 (Dunning’s Road / Sunnyside Close)

Application: DM/26/0073

Dear Mr Swift,

I am submitting this additional note in relation to the Verified View document (Viewpoint 02 – Dunning’s Road junction with Sunnyside Close) uploaded by the applicant on 19 August 2026. Having reviewed the AVR methodology and the baseline/proposed imagery, I wish to highlight several critical limitations which materially affect the reliability of the visual assessment and the conclusions that can reasonably be drawn from it.

1. Seasonal Bias – Summer Photography Under-Represents Visibility

The photography for View 02 was taken on 3 August 2026, during peak summer foliage. This is the period of maximum leaf density, which significantly increases screening from roadside vegetation and boundary trees.

This seasonal choice under-represents the true visibility of the proposed development. In winter conditions:

- deciduous trees lose foliage
- roadside vegetation becomes transparent
- rooflines and upper elevations would be more exposed
- lighting spill and movement would be more visible

The applicant has not provided any winter views, despite this being a standard requirement where vegetation plays a screening role. As a result, the AVR does not represent year-round impact and cannot be relied upon as a complete assessment.

2. Viewpoint Selection Does Not Reflect Real Public Experience

View 02 is taken from a single, vehicle-oriented junction, not from the more sensitive pedestrian viewpoints along:

- West Hoathly Road
- Sunnyside Close
- the footpath network
- the approach to Dunnings Mill

These are the locations where residents and visitors actually experience the rural edge character and where visibility of the development would be greatest.

By selecting a viewpoint with maximum natural screening, the applicant has avoided locations where the development would be more prominent. This undermines the representativeness of the visual assessment.

3. Wireline Format Masks Real-World Effects

The AVR is presented as **AVR1 / Type 4 wireline**, which:

- shows only massing and rooflines
- omits materials, colours, textures
- omits lighting
- omits boundary treatments
- omits parked vehicles
- omits movement and activity
- omits the loss of hedgerow at the access point (not visible due to summer foliage)

These omissions mean the AVR cannot demonstrate actual visual impact, only theoretical massing. The real development would be more visually intrusive than the wireline suggests.

4. Rural Edge Character Is Not Assessed

The junction at Dunning's Road and Sunnyside Close forms part of the transition between settlement and countryside, a key High Weald characteristic. Even limited visibility of new suburban rooflines can erode this character.

The AVR does not assess:

- change in tranquillity
- change in rural edge perception
- cumulative impact with existing development
- effect on the setting of Dunnings Mill

These are material considerations that remain unaddressed.

5. Cumulative Visibility with MM64 (District Plan Allocation)

The District Plan Main Modifications propose an additional allocation immediately adjacent to this site (MM64 – Land east of West Hoathly Road). The AVR does not assess cumulative visibility or cumulative landscape impact.

This is a significant omission, given that MSDC is now considering multiple developments in the same visual envelope.

Conclusion

The Verified View 02 does not provide a reliable or complete assessment of visual impact because:

- it relies on summer foliage
- it avoids more sensitive viewpoints
- it uses a wireline format that masks real-world effects
- it does not assess rural edge character
- it does not consider cumulative development

For these reasons, the AVR cannot be used to demonstrate that the visual impact of the development is acceptable, nor does it mitigate the heritage, landscape, or character concerns previously raised.

I respectfully request that:

1. Winter viewpoints are provided;
2. Additional pedestrian viewpoints are included;
3. A full LVIA is submitted with rendered AVR2/AVR3 views;
4. The visual impact is reassessed in light of cumulative development proposed in the District Plan Main Modifications.

Until this is done, the visual assessment remains incomplete and cannot support approval of the application.

Kind regards,



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