



Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Date: 21 November 2025
Our ref: 10776

For the attention of: Stuart Malcolm

Application ref: DM/25/2661
Location: Land At Coombe Farm London Road Sayers Common West Sussex

Proposal/Description: Outline planning application (with all matters reserved except for access) comprising a residential development of up to 210 dwellings (Use Class C3); with associated access; landscaping; amenity space; drainage and associated works.

Thank you for consulting with Place Services on the above Outline planning application. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

Site Context:

The application site is located to the south of Sayers Common village, between the A23 to the east and the B2118 to the west. A small access road runs centrally through the site from east to west. The site is surrounded by Priority Habitat deciduous woodland and Ancient Woodland and comprises several grassland fields. Coombe Farm and Stonecroft is located centrally however is not within the site boundary.

Planning Policy Context:

Mid Sussex District Plan (MSDP) (Adopted March 2018)

Policies considered relevant include [inter alia]:

- Policy DP12 Protection and Enhancement of Countryside
- Policy DP13 Preventing Coalescence
- Policy DP37 Trees, Woodland and Hedgerows
- Policy DP38 Biodiversity

Hurstpierpoint and Sayers Common Neighbourhood Plan (Made 2015)

The following policies are considered relevant to this application:

- POLICY Countryside Hurst C1: Conserving and enhancing character:
- POLICY Countryside Hurst C2: South Downs National Park
- POLICY Countryside Hurst C3: Local Gaps and Preventing Coalescence:



- POLICY Housing Hurst H1: Hurstpierpoint and Sayers Common new housing development:
- POLICY Housing Hurst H3: Sayers Common housing sites:
- POLICY Housing Hurst H5: Development principles:
- POLICY Housing Hurst H6: Housing sites infrastructure and environmental impact assessment

Policy C3 Local Gaps states: *“Development will be permitted in the countryside provided that it does not individually or cumulatively result in coalescence and loss of separate identity of neighbouring settlements, and provided that it does not conflict with other Countryside policies in this Plan.”*

Mid Sussex Local Plan (Reg 19)

Policy DPSC5 ‘Land at Coombe Farm’ is a draft allocation for the site. The draft allocation is for 210 dwellings, with policy requirements including:

- *“1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services.*
- *2. Prioritise pedestrian and cycle access throughout the site.*
- *3. Integrate and enhance the existing PRow which cross the site.*
- *5. Address impacts associated with areas of ancient woodland both on and adjacent to the site.*
- *6. Follow a sequential approach by directing development away from areas of flood risk associated with the site.*
- *8. Provide good acoustic design to address noise impacts associated with the adjacent A23 to the east.”*

Mid Sussex Landscape Capacity Study (2007/2014)

The site is located within 62 Hickstead - Sayers Common Low Weald. The Landscape Sensitivity of this area is assessed as substantial, owed to the areas of intact hedgerow and woodland, contributes to the setting of settlements and provides separation between settlements. The area is also assessed as having slight value. This is assessed overall as having Low/Medium Capacity for development.

Table 3.4 states *“A Low/medium capacity rating indicates that development is likely to have an adverse effect on most of the character area and while smaller development may be possible in a very few locations within the character area, it will not be suitable for strategic scale development.”*

The site is also located within a Gap Policy Area (Dwg no. HDA1).

Review of LVIA:

The application has been accompanied by a Landscape and Visual Appraisal (LVA) undertaken by Scarp Landscape Architecture and Environmental Planning. We generally agree with the approach included within the submitted Methodology (Appendix D) and judge

that it broadly follows the Guidelines for Landscape and Visual Impact Assessment (GLVIA3).

We would have preferred the concluding judgements to have been presented in a tabular format for ease of review.

Landscape Character

An assessment of the landscape character effects is included within Section 7.0.

The landscape receptors included within Section 7 of the LVA are limited to physical landscape, local landscape character, the South Downs National Landscape (SDNP) and night-time character.

The effects on the character of the site and the wider scale character of individual relevant Landscape Character Areas (LCA) is combined under 'local landscape character', with concluding **medium/high sensitivity, very low magnitude of change** and an overall **slight significance**.

We therefore judge that this landscape receptor is too broad to be representative of the character of both the site and the wider landscape character areas. We judge that a **slight significance** is not representative of the landscape character of the site.

We would have therefore broken down the character area into effects on:

- Site and Immediate Context
- Wider Landscape
- Hickstead Low Weald LCA (Mid Sussex Landscape Character Assessment, 2005)
- Adur to Ouse Scarp Footslopes LCA (J2)

Using the submitted methodology, we judge that the Site and Immediate Context would be assessed as **medium/high sensitivity, medium magnitude of change and major significance of effects**. The proposed development would have a strongly adverse effects on the character of the site itself which is not represented using the landscape receptors identified.

Visual Amenity

Appendix B of the LVA includes the location of viewpoints used within the assessment. The viewpoints identified include a mix of publicly accessible and private viewpoints (A, B, C). Judgements on effects of visual receptors are included within Section 8.0. We would have preferred that each of the viewpoint letters were assigned to visual receptors for ease of assessment.

A setback is provided from the western site boundary, which reduces views of built development from the B2118.

Paras 8.3.1 to 8.3.3 provide judgements on the assessed effects from the B2118 which runs along the western boundary of the site. The assessment refers only to road users within the susceptibility and sensitivity, and neglects to assess the impacts of pedestrians on the

pavements on each side of the B2118. Alongside the low-clipped hedgerow, there will be strong views for pedestrians into the application site and of the built frontage which will impact the rural character on departure from Sayers Common village.

The LVIA acknowledges that there will be **major significance of effects** on PRoW 34HU which runs through the application site (Para 8.6.3). We agree with this judgement.

The southern parcel is judged to be more visually sensitive than the northern parcels. Within the southern parcel, the PRoW runs along two sides of the parcel which allows open uninterrupted views of the open grassland countryside which is very characteristic of the surrounding landscape character areas. There are also long-distance views to the south from the PRoW of the South Downs escarpment, which will be interrupted and lost as a result of the proposed development (Photographs C and D).

The northern parcel, however, is more enclosed from surrounding high sensitivity visual receptors. A low hedgerow is located alongside the central bridleway which separates the PRoW from the site and reduces some of the visual impact. The most northern parcel is also more enclosed and separated from surrounding visual receptors.

Review of the Submitted Proposals

Policy Countryside HurstC3 within the Hurstpierpoint and Sayers Common Neighbourhood Plan (2014) identifies the site as within a Local Gap. The proposed development reduces the gap between Sayers Common and Albourne by approximately 300m. We have concerns regarding the contribution to coalescence of these two settlements in relation to Policy DP13 Preventing Coalescence within the Mid Sussex District Plan. Whilst in isolation, the site does not coalesce the two settlements, the site does contribute heavily to reducing the gap between these two settlements under the Local Gap policy.

The southern parcels of the site are more visually sensitive than the northern parcels and are also located further from the settlement edge of Sayers Common. In combination with our concerns regarding contribution to coalescence, we judge that the northern parcels have more capacity for development than the southern parcels.

We concur that the revised July 2025 layout improves the street scenes, particularly towards the south of the site where views from the PRoW across the SuDS basin is now of an active frontage with dwellings overlooking the POS.

More information is needed on the accessibility of the attenuation/retention basins. Most of the available public open space (POS) is utilised for SuDS drainage areas (attenuation basins) providing limited accessible space for all year-round use. We therefore advise that less of the available POS is allocated for SuDS and areas of mown grassland and meadows with paths are proposed instead.

Other recommendations include:

- Many of the plans submitted, including with the Landscape Strategy (i.e. Page 11), include older plans where the dwellings do not overlook the POS and footpath to the

southern half of the site. The documents should be updated to make reference to most up to date plans.

- *Sambucus nigra* should not be proposed as the species can suppress the growth of other species. We advise this is replaced with another species.
- Boundary fences should not be proposed around the basins. To encourage the multi-functional use of these spaces, we advise that soft landscaping is used as a buffer to the edge instead.
- A definitive circular walk which circumnavigates the site should be included within the proposals. Access into the eastern edge of the most northern parcel should be considered.

Submission documents:

If minded for approval, the following documents should be submitted:

- Landscape Strategy
- SuDS Strategy
- Hard Landscape Plan
- Soft Landscape Plan
- Landscape Management Plan

Summary:

Overall, we have some concerns regarding the landscape and visual impact of the proposals, as well as coalescence of settlements. There appears to be greater capacity for development within the northern parcels compared to the southern parcels, owed to their stronger containment, relationship to the settlement edge of Sayers Common, absence of PRoWs within the parcels, and reduced visibility over the South Downs escarpment. If the application is minded for approval, we advise the above comments on the design proposals are considered.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk



Place Services provide landscape advice on behalf of Mid Sussex District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.