



3rd November 2022

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

SPECIALIST LANDSCAPE ADVICE

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

Application: DM/22/2416

Location: Land South of Henfield Road Albourne West Sussex

Proposal: Outline planning permission for the erection of up to 120 residential dwellings including 30% affordable housing, public open space and community facilities. All matters are reserved except for access.

Dear Joanne,

Thank you for re-consulting the Landscape Advisor to Mid Sussex District Council on the above outline application. With reference to the above-named application and submitted documents received by Place Services on the 04/10/2022, asking for Landscape comments, our comments are made below. This consultation response should be read in conjunction with our previous comments.

Summary

Not supportive on landscape grounds	X
Supportive subject to attached recommendations and / or conditions	
Further information required prior to determination	
No landscape comments / do not wish to comment	

Based on the information as currently presented, we deem that the proposed development would have an adverse effect on landscape character and visual amenity. Consequently, the proposed development by its very nature, would have an adverse and eroding impact, which conflicts with the



Mid Sussex District Plan, the Albourne Neighbourhood Plan and further contradicts the National Planning Policy Framework and Planning Practice Guidance.

Context

As part of this re-consultation, we have reviewed the following new documents:

- Addendum to Landscape and Visual Impact Assessment (Ref: 3018-APA-ZZ-00-RE-L-0001-P02)

The Application Site is formed of two large agricultural fields and a small orchard located to the south. The Site area is approximately 11.54ha. It consists of two large arable fields and a small triangular field including a traditional orchard. It abuts the settlement boundary of Albourne which is formed by development fronting onto The Street.

Agricultural fields and open countryside are located to the west and north-west of the Application Site and a PRoW (Path 15_1AL) crosses the centre of the site east to west between the northern and southern fields. This adjoins with another public footpath (Path 12_1AL) which runs north/south along the eastern boundary of the southern field, connecting to Church Lane.

It is not located within a designated landscape designation, though the landscape the site falls within is notably undulating and forms part of the foothills to the scarp within the South Downs National Park (SDNP) which includes the prominent Wolstonbury Hill at over 200m AOD (Above Ordnance Datum). The scarp extends to the south-west to include New timber Hill and Devil's Dyke. The site is also not allocated in either the Mid-Sussex District Plan or the Albourne Neighbourhood Plan.

Local Planning Policy

The development plan consists of the Mid Sussex District Plan 2014-31 (adopted 2018) and the Albourne Parish Council Neighbourhood Plan (made September 2016). Details of policies and guidance documents that should be considered can be found in our previous response dated 26/08/2022.

Review of submitted information

The application has been supported by a Landscape and Visual Impact Assessment (LVIA) undertaken by Allen Pyke Associates (July 2022). As part of this re-consultation, Allen Pyke have produced an addendum, which responds to our previous comments and seeks to provide clarifications and additional information to assist readers in their consideration of the application. This includes; landscape character baseline, landscape value, landscape setting of settlements and visual amenity.

For ease of comparison, we have followed the same structure in this response.

Landscape character baseline

The importance of understanding the landscape character of all landscapes in England is recognised in the National Planning Policy Framework (NPPF) published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in July 2021, which states that planning policies and

decisions should contribute to the natural environment by: *“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services”*. Landscape character assessment is the process which can identify these intrinsic values and unique characteristics of the diverse landscapes in the UK.

The LVIA addendum has included the West Sussex Landscape Character Assessment and Sussex Historic Landscape Characterisation study, which is welcomed. We note that the assessment states that no additional sensitivities or opportunities for the Site or Study Area are identified through this additional published information, however, the strategy does reiterate similar guidelines in respect of development in rural settlements, such as *“ensure that new development respects and complements rural settlement form, pattern and character and its landscape setting, reinforcing local distinctiveness”* and *“...identify and conserve sensitive parts of settlement settings. Where possible, maintain a direct relationship between the old settlement core and the surrounding landscape, allowing views in and out of the settlement.”* On this basis, there is still overriding concern that the scheme will have an adverse impact on the landscape setting of the village, the character of the site and the immediate setting and the relationship of the site within the wider landscape.

Landscape Value

We advised that the assessment of landscape value is based on the LI Technical Guidance Note (TGN) ‘Assessing the Value of Landscapes Outside National Designations’ 02-21, which breaks down value into defined criteria. In response, the applicant has taken Table 1 of the TGN and commented on each factor / criterion and provided narrative on indicators and evidence relevant to the Site. Though this is welcomed, we question the way the factors have been analysed and note that none of the factors have been given a judgement (scale of negligible to high value), which would then inform the overall landscape value judgement.

Landscape Setting of Settlements

The applicant has agreed with our commentary on the description of the settlement pattern of Albourne. However, they have expressed that the pattern lacks a sense of a centre to the village and therefore there are opportunities to enhance the character of Albourne Village in the long term.

Though we take these comments into consideration, we are still of the judgement that a development of this scale on the western edge of the settlement will no doubt have an urbanising impact on Albourne and the rural western settlement edge and in turn have an adverse effect on the sense of place.

Visual Amenity

The appraisal has identified visual receptors within the Study Area that are likely to have visibility of the Proposed Development. These include [but are not limited to]; Residents at Albourne, Motorists and Pedestrians on Henfield Road and PRow users.

The viewpoint photography has been revised to include supporting information regarding the projection, date, and time of captured photography, make and model of camera and its sensor format,

make and focal length of the camera lens(es) uses. However, details of Horizontal Field of View (HFOV) of photograph / visual are still missing. That said, the panoramas are now supported by single planar image (390x260mm) to provide a more accurate representation of the view, which is welcomed.

On review, the applicant has provided further narrative to support the 'beneficial' residual effects on views, stating that *"the scheme proposals will be developed at the Reserved Matters stage to ensure that walks see positive elements introduced into their view"*. They also refer to the LVIA methodology (Paragraphs 2b and c), which sets out the criteria for 'Quantifying the direction of the Significance of Effects'. As part of the adverse criteria, it states:

- *"Out of scale with landform &/or pattern of an area/view*
- *Loss of attributes or deterioration in contribution to an area/setting/view*
- *Disrupts balance of elements in an area/view or sense of tranquillity.*
- *Lacks ability to include adequate or appropriate mitigation*
- *Conflicts with local/national planning policies or guidance to protect an area's character or a View"*

In our professional judgement, the introduction of up to 120 dwellings within this location will bring forth a sense of urbanisation and will in turn disrupt the balance of elements in the view from PRoW 12_1Al and 15_1Al. For this reason, any residual effect on these visual receptors should be deemed as adverse rather than beneficial.

A similar stance could be taken for other identified visual receptors such as VR10: Walkers at Footpath 18Al, where beneficial residual effects have been judged. Given the permanent nature of the housing development, there will still be a deterioration in the view given the disruption to the sense of tranquillity and rurality. Therefore, we would advise adverse residual effects would remain.

Conclusion

To conclude, we have reviewed these judgements and although we agree with some of the statements, generally we believe the assessor has under-valued / under-estimated the adverse impacts the proposed development will have on the site and the surrounding landscape. Therefore, we are of the professional judgement that the proposed development would result in adverse impacts on visual amenity and landscape character, which is not supported under Policy DP12 of the Mid Sussex District Plan (2018) and therefore conflicts with the National Planning Policy Framework.

If you have any queries regarding any of the matters raised above, please let us know.

Kind regards,

Ryan Mills BSc (Hons) MSc CMLI
Principal Landscape Consultant
Place Services

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.