



26th August 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 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 04/08/2022, asking for Landscape comments, as per the agreed timescale, our comments are made below.

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, qualities 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 consultation, we have reviewed the following documents:

- Green Infrastructure Plan (Dwg no. 1205)
- Design and Access Statement (Ref: 3117-A-4000-C)
- Parameter Plans
- Location Plan
- Planning Statement
- Landscape and Visual Impact Assessment (Ref: 3018-APA-ZZ-00-RE-L-0001-P02)
- Illustrative Landscape Masterplan (Dwg no. 3018-APA-ZZ-00-LA-L-1000)
- Illustrative Layout (Dwg no. 1005)
- Biodiversity Net Gain Assessment (Report No: CSA/4426/04/A)
- Arboricultural Impact Assessment (Barton Hyett Associates, 2022)

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.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in July 2021. The NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing "*valued landscapes*" and sites of biodiversity or geological value / soils. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

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).

Mid Sussex District Plan (MSDP)

As the site is located within the countryside, the application must have consideration for Policy DP12: Protection and Enhancement of Countryside, which states:

“The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- *it is necessary for the purposes of agriculture; or*
- *it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.*

Agricultural land of Grade 3a and above will be protected from non-agricultural development proposals. Where significant development of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.”

Other policies of considered relevance include DP18: Setting of the South Downs National Park; Policy DP37: Trees, Woodland and Hedgerows and Policy DP38: Biodiversity.

Albourne Parish Council Neighbourhood Plan

The application should have consideration for Policy ALC1: Conserving and enhancing character, which states:

“Development, including formal sports and recreation areas will be supported in the countryside, defined as the areas outside the Built up Area Boundary shown on the policy map where the following criteria are met:

1. *It is necessary for the purposes of agriculture, or some other use which has to be located in the countryside;*
2. *It maintains, or where possible enhances, the quality of the rural and landscape character of the Parish area;*
3. *It is supported by a specific policy reference elsewhere in this Plan.*
4. *It is necessary for essential infrastructure and it can be demonstrated that there are no alternative sites suitable and available, and that the benefit outweighs any harm or loss.”*

Other policies include: ALC2: South Downs National Park and Policy ALH1: Housing.

South Downs National Park: View Characterisation and Analysis

The South Downs National Park: View Characterisation and Analysis (2015) was prepared by LUC on behalf of the SDNPA. The document provides an analysis of views to, from, and within the National Park and identifies their qualities, threats, and management guidance to ensure the special qualities of the SDNP are retained. In relation to the application Site, it identifies the 'Views from the scarp looking north across the Low Weald outside the National Park' view type.

The special qualities of 'Views from the scarp looking north across the Low Weald outside the National Park' include:

"The elevated position on the scarp means this view type represents the stunning panoramic views that are recognised as contributing to the Park's special qualities. It also reveals a rich variety of wildlife and habitats (the second of the Park's special qualities) including some of the iconic habitats of the South Downs such as the sheep-grazed chalk grassland, juniper scrub and calcareous pedunculate oak-ash woodland. The view also reveals the tranquillity of the downs as a result of the lack of intrusive development and sense of space."

Identified threats to this view type could result from changes that affect the iconic habitats of the scarp, disrupt, or alter the scale and shape of field patterns, change the distinctive settlement pattern of small historic villages or form intrusive new developments within the view either by day or night. The report also includes 'Aim & management Guidance' which seeks [inter alia] to:

- *"Maintain the generally undeveloped character of the view, especially within the National Park.*
- *Ensure that development outside the National Park does not detract from the general rural farmland patchwork setting to the Park.*
- *Ensure that any built development is integrated into its rural landscape context using native vegetation and visibility from the SDNP minimised.*
- *Maintain the scale and shape of the distinctive field patterns associated with the scarp footslopes and Low Weald beyond the Park".*

Landscape Capacity Study (LUC, 2014)

LUC was commissioned by Mid Sussex District Council in March 2014 to undertake a study to assess the capacity of the District to accommodate development. The Site was included and formed part of Landscape Capacity Area 63: The Albourne Low Weald.

The study concluded that Area 63 was assessed as having a:

- Landscape sensitivity: substantial;
- Landscape Value: moderate; and
- Landscape Capacity: Low / Medium.

A low/medium capacity in the study can be defined as *"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.”

Review of submitted information

The application has been supported by a Landscape and Visual Impact Assessment (LVIA) undertaken by Allen Pyke Associates (July 2022). The LVIA has been carried out accordance with the principles set out within 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). The assessment includes a desktop study, a review of the landscape and visual baseline, Mapping (including a Zone of Theoretical Visibility (ZTV), and an assessment of landscape and visual receptors, that includes value, susceptibility and sensitivity and an assessment of potential direct and indirect effect on landscape and visual environment.

Landscape character

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 has identified the landscape baseline of the site as including the National Character Area (NCA) as defined by Natural England, Landscape Character Area (LCA) as defined in A Landscape Character Assessment for Mid Sussex (2005) and Ardingly Character Assessment (2012). The Site and its surroundings are considered in several different landscape character assessments, which from our record, have all been referenced in the baseline review bar the West Sussex Landscape Character Assessment and Sussex Historic Landscape Characterisation study

As identified in the LVIA, locally the site falls on the border between the Hickstead Low Weald LCA 4 and Hurstpierpoint Scarp Footslopes LCA3. Key characteristics relevant to the Site include:

- *‘Views dominated by the steep downland scarp to the south and the High Weald fringes to the north.*
- *Arable and pastoral rural landscape, secluded in places, a mosaic of small and larger fields, woodlands, shaws and hedgerows with hedgerow trees.*
- *Quieter and more secluded, confined rural landscape to the west, much more development to the east, centred on Burgess Hill.*
- *Biodiversity in woodland, meadowland, ponds and wetland.*
- *Mix of farmsteads and hamlets favouring ridgeline locations, strung out along lanes.*

The Management Objective is to *“Conserve and enhance the quiet, rural qualities of the western part of the area, encourage landscape restoration and woodland management, and ensure that new development is well-integrated within the landscape.”* This includes minimising *“the the effects of*

adverse incremental change by seeking new development of high quality that sits well within the landscape and reflects local distinctiveness.”

GLVIA3 (Para 5.31) emphasises that “assessment of the value attached to the landscape should be carried out within clearly recorded and transparent framework so that decision making is clear” GLVIA3 also recognises that landscape value is not always signified by designation “the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value”. We would therefore have expected to see the assessment of landscape value to be 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. This should then be presented with a supporting narrative that justifies the determined values.

The assessment includes a narrative that explains the associated significance of effect judgements and has also presented these within a summary table, which is welcomed. 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.

The landscape setting of settlements are essential components of their character and local distinctiveness. It is therefore important that the significance of settlement pattern, edge treatment and character is recognised, and that new development does not dilute their contribution to maintaining the distinct form and pattern of these settlements and their landscape setting and separation from other settlements. In terms of Albourne as a settlement, at the localised scale, there are some groupings of houses that are generally in a nucleated pattern, with many closely grouped together around a green or public open space. However, when viewed at the village scale, the settlement of Albourne has been designed and constructed around the alignment of the B2118, which is situated on the eastern edge of the village. 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. For these reasons, we would judge the proposed development would have a moderate adverse residual landscape effect on Albourne Village.

Visual Amenity

Visual effects are a result of the sensitivity of visual receptors (people who will experience changes to existing views) to the proposed development and the magnitude of those changes. 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 applicant undertook two site visits that were carried out in early April and July to assess the varying visibility of the Site from several public vantage points including roads and public rights of way. We appreciate that some of the viewpoint photographs were taken in early spring views when deciduous trees are not in leaf and therefore helps represent a ‘worst case baseline/scenario’. However, this is not the case for all supporting photography.



It's also noted that the photography has not been supported by any information regarding the projection, date, and time of captured photography, make and model of camera and its sensor format, make, focal length of the camera lens(es) used, Horizontal Field of View (HfOV) of photograph / visual, and direction of view. This conflicts with the guidance set out in the LI TGN 06/19: 'Visual Representation of Development Proposals'. We would also commonly advise that viewpoint photographs are presented as a single image (390x260mm) with panoramic images for baseline/context information only. This is because panoramas on an A3 sheet are too small to provide a representation of the proposed development.

On review, it has been judged that on completion of the development after 15 years that the majority of the residual effects will be beneficial given the introduction of new planting on boundaries and within the site. Though we appreciate that the landscape enhancements proposed in the southern field would have ecological benefits. It still needs to be acknowledged that by introducing additional tree and shrub planting in this field, it's likely that the open views towards the South Downs scarp will be reduced. Furthermore, though the built envelope has been restricted to the field to the north of PRoW 15_1AI, therefore not physically blocking the views. It will still have a significant impact on the character and aesthetic of the PRoW and the perceived sense of place. This sense of urbanisation and will be further exacerbated by the proximity of the PRoW to the built development edge. On this basis, though the LVIA judges those residual effects on the PRoW 15_1AI will be substantial beneficial. We would judge effects to be moderate – substantial adverse.

Similarly, there are other identified visual receptors such as VR10: Walkers at Footpath 18AI, VR6: Walkers at Footpath 12_1AI and VR4: Users of Henfield Road where beneficial residual effects have been judged. However, 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 are of the professional judgement that the LVIA has not fully addressed the potential impacts on landscape character and visual amenity and with that we have significant concerns that the proposed development would result in adverse impacts on visual amenity and the site's rural countryside location. For this reason, we are of the judgement that the application does not comply with 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.