

# Briefing Note: L&V Rebuttal

**Project name:** Land south of Green Road, Wivelsfield Green  
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## Introduction

- 1.1. Pegasus Group was commissioned by the Applicant to provide landscape and visual consultancy services for a residentially led masterplan on land at south of Green Road, Wivelsfield Green (the site).
- 1.2. A detailed landscape and visual impact assessment (LVIA) was prepared and submitted as part of the outline planning application to Lewes District Council (LDC) (application reference LW/24/O820).
- 1.3. During the preparation of the application, meetings were held online, and on site, with East Sussex County Council's ESCC) landscape officer, presenting the proposal to them and giving them early sight of the landscape-led approach to the masterplan for the proposed development.
- 1.4. Following submission of the outline application, ESCC have provided a consultation response on landscape and visual matters. Although this response is dated January 2025, it appears that the documents had not been uploaded to the application website, and Pegasus Group are only now responding, given they were made aware of the consultation response in August 2025.
- 1.5. This briefing note sets out a brief review of the consultation response on landscape and visual matters, responding to key points as necessary. Where points raised in the consultation response are not addressed, this does not imply our agreement with those matters raised.

## Consultation Response

### Recommendation

- 1.6. The consultation response recommends refusal, stating that:

*"The proposed development would be of a scale which would significantly detract from the character and scale of the village. The rural character of the site would be lost to an extensive suburban extension. The development would extend much deeper into the countryside and away from the built-up area than recent permissions. The enclosed nature of the site should not be considered a reason for development as there would be adverse effects on local countryside views and the edge of the village."*

- 1.7. Notwithstanding the objection in principle, the content of the objection includes reference to the enclosed nature of the site, and that impacts and effects (in the context of this enclosed nature) would be localised and limited to the edge of the village.

**Enclosure**

- 1.8. ESCC do not consider enclosure to be a reason to justify development, however it is a physical attribute of the landscape which contributes to the capacity of the landscape, and contributes to a lower overall 'susceptibility' (a contributing factor of landscape sensitivity). This is because the physical and visual enclosure that is provided by the topography (rising to the south), green infrastructure (trees and woodland on three sides) and also the existing built edge of the settlement (to the north), all serve to physically and visually enclose the site.
- 1.9. This will prevent the influence of the proposed development extending much beyond its immediate boundary and therefore ensuring that the local and wider landscape context is conserved.
- 1.10. No greenfield development will avoid landscape and visual effects entirely, and some residual effects will be inevitable for all sites coming forward on the settlement edge. Where effects can be limited, and where they will be localised, these should be considered as something positive in the planning balance, as opposed to a site where development might have much wider reaching or larger scale impacts on the countryside.

**Valued landscapes**

- 1.11. The consultation response states that this is unlikely to be a 'valued landscape' in respect of the NPPF. Whilst all landscapes have some 'value' (the second factor in determining landscape sensitivity), we agree that this is not a 'valued landscape' in relation to paragraph 187a of the NPPF (noting the consultation response refers to NPPF paragraph 180a, which it is assumed is an error or out of date reference).

**Settlement pattern**

- 1.12. The consultation response and justification for refusal notes that '*...development would extend much deeper into the countryside and away from the built-up area than recent permissions*'.
- 1.13. Comparison against recent permissions is not appropriate, and the nature and scale of the proposed development should be considered on its own merit, and against the attributes of the site and its local context. Notwithstanding this, the appeal decision for the 'land at South Road, Wivelsfield Green' (reference APP/P1425/W/22/3299370, paragraphs 19–22) establishes a general principle that containment can influence (and limit) impacts.
- 1.14. Whilst the proposed masterplan does extend south, it remains physically and visually contained by the existing topography and woodland edge. The masterplan includes a substantial landscape buffer at this point also, and the limit of development has been influenced by the landscape led approach, including reference to the topographical levels, and building lines, where this references existing dwellings to the west.
- 1.15. Also, in respect of settlement pattern, the consultation response notes that the eastern part of the site is part of an 'important gap' between the western and eastern parts of 'Wivelsfield Green'. The LVIA takes the view that Wivelsfield Green sits to the east of the

gap, whilst Wivelsfield sits to the west, both as separate areas of settlement. In respect of the proposed development, these distinct identities are maintained, with proposed residential development omitted from the landscape between Wivelsfield and Wivelsfield Green (aside from a short section of the access road) and that this part of the landscape will be subject to landscape and ecological proposals which will maintain this as open space. The consultation response also notes how the eastern part forms a backdrop to the war memorial, and this remains the case. The parkland character of this area is also referred to later in the consultation response; despite this being agricultural land currently, the parkland character will be maintained and enhanced through the ecological and landscape proposals for this area.

- 1.16. A 'linear character' is also referred to in the consultation response. Whilst this may be apparent in part, linear development is not necessarily something that should be perpetuated in the growth of a settlement. To the east, at Wivelsfield Green, a similar linear pattern is evident along key routes, but this has been infilled over time. Here, North Common Road and South Road both maintain a linear characteristic, albeit the settlement has depth beyond these routes. The consultation response refers to a 'nuclear' [sic] pattern off South Road, however this is more a pattern of infill between the linear development over time, rather than a true 'nucleated' pattern of development formed around a core point.
- 1.17. With Wivelsfield (i.e. the settlement area to the west), the linear pattern will be retained along Green Road (particularly with the depth of the existing recreation ground off this route) and there will be no perception of the change to the settlement pattern from these routes. There will of course be some perception of change on and adjacent to the site, however, as noted before, this is localised and won't be apparent from much of the locality round the settlement. An approach whereby the settlement can accommodate growth, adding depth to the existing pattern but with only localised impacts, ensures that development which may result in extensive encroachment into the wider countryside, is avoided.

### **Sensitivity**

- 1.18. Landscape sensitivity is referenced in the consultation response, noting again points related to the perceived linear settlement pattern (and its importance), which are not agreed. The consultation response references the published studies on landscape sensitivity. These are covered in detail in the submitted LVIA, and the conclusions of the published document broadly align with the site specific assessment of landscape sensitivity which is undertaken in the submitted LVIA. There is consistency between the evidence base and the submitted LVIA for judgements on landscape sensitivity.
- 1.19. Furthermore, the consultation response states that '*... it should be noted that the sensitivity assessment does not include the western parcel of the proposed development site*' however this does not appear to be correct, as sensitivity parcel Wivelsfield E, does appear to align with the site (i.e. land between Wivelsfield, West Wood and the public bridleway).

### **Professional judgements**

- 1.20. The consultation response refers to various judgements on sensitivity and significance of effects, generally suggesting these should be higher.
- 1.21. Overall, the Pegasus Group LVIA is undertaken using an established methodology and the judgements in the LVIA are considered to be consistent and robust. For LVIA, there is always an element of professional judgement, however the baseline appraisal, consideration

of constraints and opportunities, and iterative approach to the assessment and design, have led to a robust scheme of landscape-led mitigation that has positively influenced the masterplan. Judgements on impact and effect should give this positive approach due consideration, given the masterplan is not entirely based on built form.

#### **Errata**

- 1.22. The consultation response notes that paragraph 5.4 of the submitted LVIA refers to the 'East Hertfordshire Landscape Character Assessment'. This is a typographical error in the report, however it is important to note that the correct landscape character assessment for the area have been used during the baseline, appraisal and assessment stages of the LVIA. This does not affect the judgements or conclusions drawn.

### **Summary**

- 1.23. The submitted LVIA is based on a robust approach which has been applied consistently and objectively and the conclusions therein are considered robust. The site represents a good opportunity to bring forward development that will have only localised landscape and visual impacts and effects, but more importantly does incorporate a landscape led approach which ensures that a high-quality scheme of landscape mitigation forms an inherent part of the masterplan.