

Mr. James Smith,
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please contact

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Environment Team

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date

28.01.2025

your ref

LW/24/0820

Dear Mr. Smith,

Proposal: Outline application for the erection of up to 150 dwellings, with associated works, parking, landscaping, publicly accessible open space, land for education or community use, with access from Green Road and Eastern Road
At: Land at Green Road, Wivelsfield, East Sussex

With reference to your email asking for comments on the above application, having visited the site and reviewed the documents I have the following comments regarding the potential landscape and visual impacts.

This advice is provided to the Local Planning Authority by the County Landscape Architect in line with the Service Level Agreement and is not a statutory consultation response.

Recommendation

Recommend for refusal	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.
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Reason for Recommendation

1. The NPPF (2021) Section 15 provides policies for conserving and enhancing the natural environment. Paragraph 180 states that:

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*
 - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
2. The site would be unlikely to be considered valued landscape in the context of the NPPF paragraph 180 a). The site is in a countryside location on the edge of the Wivelsfield village. The western part of the site is used informally by walkers, many using the area to access the public footpath which crosses the site and the woodland walks to the south. There are views across the site from the bridleways on the western and eastern boundaries. The site is of value to local people for this formal and informal access and the rural views across the area. The site area forms the rural setting to the village. The eastern parcel is designated in the Neighbourhood Plan as Local Green Space and this elevates its value. This area is considered an important gap between the distinct western and eastern parts of Wivelsfield Green. It also provides a rural backdrop to the war memorial.
3. The Wivelsfield Neighbourhood Plan was produced in 2016 and reviewed in 2021 the following is an extract from the 2016 NP:

The Neighbourhood Plan's Vision aims to ensure that Wivelsfield Parish develops in the way the community wants in maintaining the rural environment, an attractive village centre, a viable community, housing for all and better facilities and services.
4. The 2021 review does not change the housing allocations of the original plan which allowed for 34 new dwellings. The review highlighted that the parish has experienced 60% growth in housing in recent years. The review concludes that recent development, in addition to the 30 allocated units, is changing the nature of the community – negatively for those with a desire for small, rural village habitation.
5. The Lewes District Landscape Sensitivity Assessment states that proposed development in the village should be sympathetic to the character of Wivelsfield Green, as such it should be consistent with the scale and typologies of surrounding development. The village has a linear character as it has developed as ribbon development along Green Road, which becomes North Common Road further east. The existing development along Eastern Road is also linear. The sites identified as Wivelsfield Green E and F in this study are part of an open gap between the more nucleated western and eastern parts of the village. The assessment suggests that Wivelsfield Green E is of **medium** sensitivity for small scale residential development. It assesses the parcel as being of **medium to high** for large scale development, it should be noted that the sensitivity assessment does not include the western parcel of the proposed development site.
6. The proposed development of the majority of Wivelsfield Green E would extend into the southern part of the area and would not relate to Eastern Road. A development of 150 houses extending into the southern fields would be large scale. Whilst the field boundaries could be retained between development parcels the field pattern would be lost to development. The comment by the Inspector quoted in point 8 below acknowledges that field boundaries where the fields are infilled with development are no longer appreciated as such.
7. The sensitivity assessment identifies that Wivelsfield Green F is of **medium to high** sensitivity for small scale development and **very high** for large scale and this acknowledges the important role it plays as a gap between the two parts of the settlement. The area has a parkland character and forms the backdrop to the war memorial and these characteristics would have contributed to the designation as Local Green Space.
8. There have been two recent decisions for new housing development on the south side of the village both of which were won at appeal.
9. Permission was granted for 45 houses south of South Road in 2021 regarding the landscape implications of this proposal the Inspector concluded:

I conclude that the development would cause harm to the landscape character and appearance of the area, but that harm would be moderated by the degree of containment that is present and the ability to avoid developing the more sensitive eastern part of the site.

10. The approved development south of South Road would be closely associated with the nuclear development to the north. The masterplan will retain an open landscape buffer to the east and a wooded buffer to the south. The developed part of the site will not extend across field boundaries and will not be extensive in character.
11. The Inspector's report on the appeal decision (PP/P1425/W/22/3305946) for the land to the east of Ditchling Road did conclude that there would be adverse effects on the countryside because of the development. Regarding the site boundaries with the countryside the Inspector considered that:

The trees along the southern boundary of the site would no longer be appreciated as a field boundary albeit they would nonetheless be retained and would form part of the proposed structural green infrastructure for the site.

12. It could be considered that these two decisions set a precedent which erodes the linear character of the village that has previously defined the character of the settlement. However, as set out above, the development south of South Road would be well contained and will relate well to the existing built-up character in this part of the village. The site to the east of Ditchling Road would not extend as far into the countryside as the proposals in this application and would be contained by existing development to the west and east.
13. The western parcel of this application site is enclosed from wider views in the surrounding countryside. There are extensive views across the western part of the site from the public rights of way network and Eastern Road. The southern fields provide a rural transition from the built-up area into the countryside. There are wide open views across the eastern parcel from Green Road and Hundred Acre Lane and the school grounds.
14. The access road across the eastern parcel would encroach on the Local Green Space and the setting of the war memorial. Any planting proposed to integrate the road into the landscape would obscure the open views across this important visual and physical gap.
15. A Landscape and Visual Assessment (LVIA) has been submitted to accompany the application. Section 3.67 of the LVIA discusses the published Landscape Sensitivity Assessment and identifies that Area F is of medium sensitivity to small scale development. This does not recognise the study found are F to be of **medium to high** sensitivity for large scale development as outlined in paragraph 6 above.
16. Paragraph 5.4 refers to the East Hertfordshire Landscape Character Assessment, it is assumed that this is an error. Paragraph 5.13 assesses the site to be of medium value, this does not take into consideration that the Local Green Space eastern section of the site would be of higher value. Similarly, the susceptibility of the eastern part of the site would be higher. In paragraph 5.17 LCA C3 Ditchling Common is assessed as being of medium to high susceptibility and yet in Table 5 it is stated to be medium. Surely if it is medium to high value and susceptibility the area would be of medium to high value. The assessment of the sensitivity of the site does not reflect the difference in value and susceptibility across the entire site area. In this context the overall judgement of sensitivity is skewed to the lower side, especially as this is assuming small to medium scale residential development. This does not concur with the published Sensitivity Assessment which identified the western part of the site (Area E) as being of **high to medium** sensitivity to large scale development.
17. The comments above regarding the sensitivity of the site would suggest that the findings in Table 6, Assessment of Landscape Effects, under assess the significance of effects on the site. These are more likely to be high adverse on completion remaining moderate to high adverse in the long term. This would be considering the permanent loss of the greenfield setting to the village and the impact of the access road on the Local Green Space.
18. The potential visual effects of the development would be localised, however some of these would be moderate to major adverse and significant in the long term. The effects on close views towards the proposed houses, which are currently towards open fields, would remain major adverse in the long term.

19. In conclusion 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.

Yours Sincerely,

Virginia Pullan CMLI

County Landscape Architect

East Sussex County Council