

Landscape Architect Response to Planning Consultation

Date 11.02.2026

Application Reference LW/24/0820

Description 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

Address Land South of Green Road, Wivelsfield Green, East Sussex

LPA Lewes District Council

Summary Response Objection

Comments

I have visited the site and its surrounding area, and I have reviewed the submitted documents, including supplementary information, along with relevant published studies.

I note the previous landscape consultation response from the ESCC Landscape Officer, dated 28.01.2025, and taking into account all of the information noted above, along with my own field observations, I firmly endorse the concerns previously raised.

I have reviewed the rebuttal of the ESCC Landscape Officer's consultation response received from the applicant's agent (Pegasus), dated 02.09.2025, and offer some commentary as follows:-

Sensitivity

I believe that the previous landscape consultation response by the ESCC Landscape Officer contained slight errors which could lead to confusion:-

- At para 15 of these comments, the ESCC Landscape Officer states that parcel F is of medium sensitivity to small scale development, and points out that the LVIA has not acknowledged that the sensitivity study identified a medium-high sensitivity to large scale development. I believe this was an error as the Landscape Officer was meaning to refer to parcel E. (The reference to para 3.67 of the submitted LVIA within the ESCC Landscape Officer's comments relate to parcel E).
- Para 5 of these comments states that "*the sensitivity assessment does not include the western parcel of the proposed development site*". I believe this is misleading, as the Sensitivity study parcels E and F broadly align with the application site. In this respect, I concur with para 1.19 of the rebuttal note from the Applicant's agent.

Nevertheless, I believe the submitted LVIA does not fully acknowledge the conclusions of the published Lewes Landscape Sensitivity Study (LLSS) with respect to parcel E (the western part of the site).

The submitted LVIA only acknowledges that the LLSS considers parcel E to be Medium sensitivity with respect to 'small to medium scale development'. (Para 3.67 of the LVIA). However, I consider that the development proposals are not consistent with this type.

The LLSS defines development typologies and scenarios in Table 1, on page 13.' The difference between 'Medium-' and 'Large-' scale development is that the 'medium scale' developments have no

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more than 100 dwellings at a maximum of 2-storeys high, whereas 'large-scale' are those of 101 dwellings or more, and may include 3 storey elements.

The proposed development is for up to 150 No. dwellings. The submitted illustrative masterplan indicates 93 dwellings and 6 apartment blocks, and the submitted Design and Access Statement indicates (on page 26) that some of these may be at 2.5 storeys high. Therefore, I regard the proposed development as consistent with the definition of a 'large-scale residential' scenario according to the LLSS, and the sensitivity of parcel E should be considered accordingly.

With this in mind, I disagree with para 5.25 of the submitted LVIA, which states that *"The conclusions between this LVIA and the AECOM study [i.e. the LLSS] do demonstrate some consistency in the landscape context being somewhat ordinary, or at least with no clear indication that this is a high sensitivity landscape"*. The LLSS does in-fact conclude that parcel E has a 'high-medium' sensitivity to large-scale residential development. I also disagree with para 1.18 of the rebuttal note which suggests that the LLSS and the submitted LVIA 'broadly align', and that *"there is consistency between the evidence base and the submitted LVIA for judgements on landscape sensitivity"*.

Western part of the site

I agree with the ESCC Landscape Officer's comment that *"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 two main settlement areas of Wivelsfield Green have separate planning boundaries (identified in the Lewes and Eastbourne Local Plan as 'Wivelsfield Green East' and 'Wivelsfield Green West'). The site does not fall within either of these planning boundaries. Wivelsfield Green East has a 'clustered' settlement pattern where residential development has occurred on sites of former horticultural nurseries, from the postwar period onwards. Wivelsfield Green West has a characteristic linear settlement pattern, as identified in the documented landscape character assessments (and acknowledged as-such within the submitted LVIA).

The linear development on the southern side of Green Road is designated as an 'Area of Established Character' in the Local Plan (Policy DM34). In accordance with the wording of the local plan, it is considered that this area makes *"a valuable contribution to the distinctive character of [Wivelsfield Green]"*. This is *"worthy of retention, and therefore warrants particular consideration when planning applications are being determined"*. Whilst this policy is acknowledged within Table 1 of the submitted LVIA, there is nothing demonstrating that the designation has been factored into determining the sensitivity of the local landscape.

Whilst I acknowledge the applicant's agent's comments that the limits of the proposed development have *"been influenced by... reference to topographical levels and building lines, where this references existing dwellings to the west"* (rebuttal note para 1.14), I nevertheless consider that the pattern of built-form within the zones indicated for development on the submitted masterplan would be inherently at odds with the linearity of the existing settlement pattern, and therefore contrary to the prevailing local settlement character.

With respect to large-scale residential development, the Lewes Landscape Sensitivity Study (LLSS) concludes that *"the scale and form of the settlement pattern would be unlikely to be retained"*, and *"the*

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parcel is unlikely to be able to accommodate these types of development without significant adverse character change or adverse visual change". (Both quotes taken from p337 of the LLSS). This is not acknowledged by the submitted LVIA, due to it erroneously considering the proposed development typology to be 'small-medium scale residential'.

The submitted LVIA does nevertheless acknowledge (at para. 3.66) the guidance within the LLSS which says *"Any development should be sympathetic to the character of Wivelsfield Green, as such it should be consistent with the scale and typologies of surrounding development. Development should be located in the northern and eastern parts of the parcel, following the route of Eastern Road, such that it is consistent with the linear settlement pattern of Wivelsfield Green."* (p337 of the LLSS). I believe there is a typographical error here within the LLSS, as 'the route of Eastern Road' is towards the northern and western (rather than eastern, as stated) parts of the parcel.

The submitted 'Development Framework Plan' is clearly contrary to this guidance. The 'proposed housing areas' occupy the majority of the LLSS Parcel E, leaving only a strip along the parcel's southern edge (north of West Wood) undeveloped. This inherently extends well beyond 'the route of Eastern Road'.

The applicant's agent has stated that *"there will be no perception of the change to the settlement pattern from these routes [Green Road]"* (rebuttal note para 1.17). They go on to acknowledge that *"There will of course be some perception of change on and adjacent to the site"* (i.e. the PRoW passing through the site), but then dismisses that on the grounds of being a *"localised"* effect.

One of the footpaths passing through this part of the site ('Westmeston 1') forms part of the Wivelsfield Green Walk, an East Sussex Promoted Route which runs in a circular route around Wivelsfield Green. The bridleway immediately to the west of the site boundary ('WSM/28/2') is the 'Sussex Border Path'. Promoted Routes are *'local, regional or national trails that have been devised by local authorities and walking organisations to promote the public right of way network'*. (Wivelsfield and Wivelsfield Green GBI Settlement Appraisal p11). Both of these promoted route continue northwards and southwards, linking to the wider public right of way network.

In the rebuttal note at para 1.14, the applicant's agent acknowledges that the proposed built form would extend south of the existing settlement edge, and justifies this with reference to physical and visual containment by existing topography and woodland edge. As-such, whilst the landscape element in question is settlement pattern, the answer has not been framed in respect to settlement pattern, it has been framed in respect to enclosure.

With respect to enclosure, the applicant's agent suggests that the site should be regarded as comparatively less 'susceptible' to landscape change than other sites that are less enclosed. The suggestion is that the physical and visual enclosure of the site *"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"* (rebuttal note 1.9).

The applicant's agent has gone on to suggest that *"Where [adverse] effects can be limited, and where they will be localised, these should be considered as something positive in the planning balance"*. I find this to be an inappropriate and contradictory statement. Adverse effects are adverse effects, irrespective of their 'reach', so it's hard to understand the justification for describing them as 'positive'. As a landscape specialist I will refrain from expressing opinions on planning matters, i.e. planning balance.

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The geographical extent of the area that may be affected by development is only one of the considerations in determining 'magnitude' of landscape effect. For instance, The Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA) para 5.49 explains that judgements should consider whether a proposed development "*changes the key characteristics of the landscape which is critical to its distinctive character*". Para 5.50 goes on to explain that "*there may for example be moderate loss of landscape elements over a large geographical area, or a major addition affecting a very localised area*".

In the rebuttal note, the applicant's agent suggests that "*linear development is not necessarily something that should be perpetuated in the growth of a settlement*". Whilst there may be over-riding reasons in favour of development that is contrary to prevailing character, the Planning decision should be informed by clear and objective assessment of the harm (or benefits) that could occur.

I consider that the way in which the submitted LVIA has been presented does not achieve this. The choice of landscape receptors for assessment is critically important to clear understanding of what harm may occur, and whether-or-not it is an acceptable harm.

GLVIA sets out various considerations for reporting on a baseline situation, particularly at para. 5.33, including not only the need to describe the character of the landscape, but also the need to "*identify and describe the individual elements and aesthetic and perceptual aspects of the landscape, particularly emphasising those that are key characteristics contributing to the distinctive character of the landscape*." Documentary evidence from numerous sources emphasise the importance of the linear settlement pattern, including within lists of key characteristics.

GLVIA para 5.34 explains that landscape receptors should be "*the components of the landscape that are likely to be affected by the scheme*" and that these may include not only overall character, but also "*key characteristics, individual elements or features, and specific aesthetic or perceptual aspects*"

As such I consider it unfortunate that the submitted LVIA limited its identification of landscape receptors just to the 2 Landscape Character Areas identified by the Lewes District Landscape Character Assessment that cover the site, and also the landscape character of 'the site and its local landscape context'. I have not found a description of that latter receptor in the submitted LVIA.

As 'the site and its local landscape context' has not been defined, it is not possible to understand what proportion of its geographical extent may be affected by the proposed development. However, it is noted that the submitted LVIA para 5.52 states that "*at a site level, character will be more fundamentally altered given the change in land use from agricultural to the residential development and this will be particularly apparent from the PRoW's which cross the site*". Accordingly, I question the judgements that have concluded the magnitude of impact on that receptor as being 'medium' upon completion, and 'low to medium' after 15 years.

Settlement pattern is evidently an important component of the local landscape, noted by the LLSS as being vulnerable to large-scale residential development such as that currently submitted for planning consideration. The un-explained decision not to include settlement pattern as a receptor within the submitted LVIA risks the recognition of this harm being somewhat overlooked, and therefore misinforming the Planning decision making process.

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Eastern part of the site

The development site also forms part of a tract of land that functions as a landscape gap between the linear settlement pattern of Wivelsfield Green (West) and the clustered settlement pattern of Wivelsfield Green (East). Whilst the importance of keeping the separation of Wivelsfield Green East and West is not a clearly defined intention in local planning policy, consideration should be given to the impact on the rural setting of the village, its distinctive landscape character and settlement pattern as well as impacts on green infrastructure links, as per the 'Development Guidelines' in the Lewes LCA which states a need to avoid the *'merging of existing settlement areas and consider the cumulative impact of additional development within the landscape'*.

It is apparent that gaps in and around the settlement contribute to its rural character and setting allowing the landscape to 'reach in' to the village, bringing the landscape, including fields, hedges and trees into its centre instead of keeping it beyond its denser edges.

Travelling along Green Road the perception of the gap is increased where the field to the south of Green Road (allocated as a Local Green Space in the Neighbourhood Plan (policy 7)) and the fields to the north (subject to separate development proposals under consideration, application ref: LW/25/0442) are adjacent. The cumulative impact on the rural character of Wivelsfield Green of nearby residential development proposals and recent approvals should be taken into account, in line with 'Development Guidelines' in the Lewes LCA.

The Local Green Space within the development site, along with the greenspace to the north of Green Road forms a green break in the built form of Wivelsfield Green, and provides a green corridor for wildlife (albeit crossed by Green Road). The Local Green Space is described as an 'important break' in the developed area, which along with the adjoining ancient woodland provides a backdrop to a war memorial and is important culturally for the parish.

The existing strong intact hedgerow along Green Road in combination with the Local Green Space to the south contribute to the rural green corridor along Green Road. It is acknowledged that the 'Proposed Green Road Access' plan (within the submitted Transport Assessment) indicates that visibility splays would be forward of the existing field boundary hedgerow along Green Lane, and as such clearance of the hedge would be limited to the width of the proposed road. Nevertheless, the proposed highway junction itself, and the presence of a new access road extending southwards would inevitably introduce more urbanising features within this stretch of Green Road, eroding its rural character.

In the rebuttal note, the applicant's agent suggests that the omission of residential development from the 'gap' between Wivelsfield and Wivelsfield Green is respectful of the existing settlement pattern, and maintains distinct identities of the separate areas of settlement. However, it does not acknowledge that the proposed access road through this 'gap' would in itself be development, and would be at odds with this ethos of leaving the area as un-developed open space. Whilst the road has not been designed with built-form alongside, it would nevertheless be perceived as a suburban feature, contrary to its baseline context of agricultural features and introducing vehicular movement which would erode the stillness and tranquillity of the existing scenic qualities.

Post-submission design changes

Post-submission design changes include the repositioning of the northernmost basin, corresponding relocation of the proposed children's play area into the proposed open space to the south-west of

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the site. Furthermore, it is now proposed to increase ground levels across the development, as indicated within the 'Flood risk and drainage technical note' (dated 21/11/2025), particularly Figure 4 'Indicative Finished Floor Levels'.

I have found no reference to Finished Floor Levels within the originally submitted documents, and as-such it is thought that the submitted LVIA would have considered potential landscape and visual effects on the basis of Finished Floor Levels being broadly consistent with existing ground levels. Para 5.38 of the submitted LVIA states that *"Some discreet localised earthworks related to the creation of practical development platforms and for the development envelope and for the attenuation area will be required, however the overall profile of the landform will remain apparent"*.

The recently provided 'Indicative Finished Floor Levels' drawing (referenced above) suggests that a large majority of the proposed development platforms and roads would be raised by 0.3 - 0.5m over the existing ground levels. The importing of many thousands of cubic metres of fill material necessary to achieve these development platforms have potentially profound implications for landscape amenity (in-so-much as permanently altering the prevailing landform, soils (a finite material) thereby jeopardising the local provenance of vegetation species, hydrology) and visual amenity (in-so-much as the proposed buildings (and their ridge-lines) would be more elevated (and potentially more visually imposing) than originally anticipated, and changes to vegetative cover and hydrology would also factor in changed view compositions).

Para. 1.13 of the 'Flood risk and drainage technical note' describes that the effect of raising development platforms and roads within the surface water floodplain would cause water to back-up against the development areas. *"Glasswalling' is seen around the raised development platforms where water is building up against the platform"*. Whilst it is suggested that this effect is *"unlikely to remain as the topography will be levelled to existing ground levels to account for the development"* this appears to disregard the presence of existing mature trees in the area in question (to the west of Bridleway 30). These trees are numbered 9 to 24, along with G8, H5 and possibly others, within the submitted Arboricultural Implications Assessment.

The submitted 'Arboricultural technical note' (dated 21/11/2025) suggests that *'Levels will transition to finished heights outside RPAs'*. However, it is clear from the Tree Protection Plan (within the AIA) that there would be less than 2m distance between the edge of the road and the RPA of T15. Correlating this with Figures 2 and 3 of the 'Flood risk and drainage technical note', it is apparent that these trees may well be at risk, either of becoming submerged in flood waters, or to be damaged by earthworks to transition ground levels up to the adjacent roadway.

I note the 'Flood risk and drainage technical note' makes some reference (at para. 1.13) to *"pipes and culverts"*, and anticipate therefore it may be possible to negate flooding risk within the areas of Trees 9 to 24 if a culvert is provided beneath the road to allow floodwaters to escape. Nevertheless, it is thought that earthworks to grade ground levels up to the 0.5m high raised development platform immediately to the south of Trees 9 to 24 would encroach upon the RPA's of those trees. Any encroachment of earthworks would not only compromise the retention of existing trees, but also displace floodwaters. The effect of these earthworks to re-grade ground levels beyond the raised development platforms, along with any proposals for culverting / piping floodwaters do not appear to have been modelled, or at least any-such model has not been provided with the 'Flood risk and drainage technical note'.

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This leads me to conclude that the post-submission changes to the drainage strategy may well have implications for landscape and visual amenity, in particular the retention of existing treecover, but these implications are not yet properly understood. I appreciate that the Planning application is seeking Outline consent, and as-such designs are only indicative at present. Nevertheless, it is evident that the principle of developing the land in question is not achievable without notable topographic and hydrological changes.

The submitted 'Landscape and Visual technical note' (dated 25/11/2025) does not provide any explanation to suggest that these changes (albeit indicative) have not been fully taken into account, and as-such I am unable to endorse the suggestion (at para 1.9 of the technical note) that *"the minor alterations do not compromise the ability for existing landscape features to be retained or the strategy of new landscaping to be integrated as proposed"*.

I acknowledge that the submitted 'Landscape and Visual technical note' refers to *"marginal perceptions of the increase in built heights of proposed dwellings as a result of the ground raising"* in relation to users of the public rights of way entering and crossing the site, together with road users along Hundred Acre Lane and Green Lane'.

Taking into account potential changes to the site's hydrology, vegetative cover, including loss of existing treecover (as discussed above), I am unconvinced that the broader change to view composition (not limited just to the effect of raising the heights of buildings) would be no more than a 'marginal perception', as suggested by the 'Landscape and Visual technical note'.

With regards to relocation of the proposed children's play area into the proposed open space to the south-west of the site, the submitted 'Landscape and Visual technical note' acknowledges that *"there would be transient views [from the southern end of the PRow where it crosses the western extents of the site] looking north across proposed open space that now proposes the children's play area"*. The technical note goes on to judge that *"The open nature of the view would remain, beyond which development would be seen"*, and that this is *"not considered to result in a change to the significance of effects on completion and operation as reported in the LVIA"*.

Whilst the proposed play area may not alter the overall significance of visual effect during in the years following completion of the development (which the submitted LVIA judges to be 'significant adverse' in any case), I believe it would nevertheless worsen the intrusion into the visual amenity, and compromise the ability of proposed planting within the open space to mitigate the visual effects of the proposed built-form (thereby increasing the magnitude of visual change relative to that states in the submitted LVIA from 15 years post development completion). The presence of the play area effectively reduces the area available for mitigation planting.

Furthermore, activity associated with the proposed playground would inevitably compromise experiential qualities such as a degree of tranquillity currently enjoyed by users of the adjacent public footpath 'Westmeston 1', which is also promoted as 'Wivelsfield Green Walk'. As-such, relocation of the proposed playground has implications not just for visual amenity, but also for landscape amenity.

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Summary

I have visited the proposed development site and the surrounding landscape, and I have reviewed the submitted information, including supplementary information.

In broad terms, I do not agree with the applicant's agent's rebuttal of the landscape comments previously offered by the ESCC Landscape Officer. I concur with the previous landscape comment comments.

I believe that the submitted LVIA overlooks several important considerations, and as-such the significance of landscape and visual harm is likely to be greater than stated.

- Contrary to GLVIA para 5.34, the choice of receptors are not the components of the landscape that are most likely to be affected by the scheme. It would be more informative if receptors were key characteristics, individual elements or features, and specific aesthetic or perceptual aspects, rather than simply focussing on landscape character.
- In particular, the omission of settlement pattern as a receptor is surprising, given repeated references to that landscape component as a key characteristic in numerous published evidence base documents.
- There is no recognition of views from the Sussex Border Path (which would have a heightened sensitivity on account of its value as a promoted recreational route).
- There is no recognition of the 'Established Character' designated status of the existing built environment along Green Road.
- The submitted LVIA's judgements regarding sensitivity are at odds with those identified by the Lewes Landscape Sensitivity Study. This is because the LVIA erroneously defines the development as 'small-medium scale residential'.
- The submitted LVIA has not explained how its conclusions have been derived (in accordance with GLVIA para. 5.54). To understand the validity of the judgements made I would expect to see consideration of size/scale, geographical extent, duration and reversibility explained in respect to each receptor.
- The submitted LVIA does not explain the judgements made with regards to magnitude of effect in a way that relates to the assessment methodology at A.3.21. In particular, there is no discussion regarding the 'nature and scale of change to key characteristics which are critical to character', nor to the 'duration of impacts'. As such, it appears that judgements have placed undue emphasis on the limited geographical extent of the area that may be affected, contrary to the GLVIA 5.49-5.50.

Furthermore, I believe that the post-submission design changes would exacerbate the harm caused to the local landscape and visual amenity.

- Raising ground levels within the development platforms and roads will (according to the 'Flood risk and drainage technical note') cause water to back-up against the development areas. Accordingly, existing mature trees adjacent to the development platforms may be trees may well be at risk, either of becoming submerged in flood waters, or to be damaged by earthworks to transition ground levels up to the adjacent roadway.

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- Re-positioning of the proposed play area into the proposed open space to the south-west of the site would compromise the ability of proposed planting within the open space to mitigate the visual effects of the proposed built-form, and also compromise the experiential qualities such as a degree of tranquillity currently enjoyed by users of the adjacent public footpath 'Westmeston I', which is also promoted as 'Wivelsfield Green Walk'.

In conclusion, I believe that the development proposals demonstrate the validity of the conclusions of the LLSS, insomuch as *“the scale and form of the settlement pattern would be unlikely to be retained”*, and *“the parcel is unlikely to be able to accommodate these types of development without significant adverse character change or adverse visual change”*.

The proposed development would be of a scale which would significantly detract from the character and scale of the village. The rural setting of the village would be lost to an extensive suburban extension.

Terra Firma / Martin Hird CMLI for and on behalf of Lewes District Council