

TOPIC SPECIFIC STATEMENT OF COMMON GROUND

Landscape and Visual Matters

Prepared by:

Golby + Luck Landscape Architects (on behalf of the Appellant)

&

The terra firma Consultancy (on behalf of Lewes District Council)

LPA Application Reference: LW/24/0820

PINS Appeal Reference: 6005671

FINAL – 2026-06-29

1. INTRODUCTION

- 1.1. This topic specific Statement of Common Ground (SoCG) has been prepared by Golby and Luck Limited on behalf of Taylor Wimpey UK Limited (the Appellant).
- 1.2. This topic-specific SoCG deals with landscape and visual matters only, and is supplemental to the main SoCG (between the main parties In June 2026).
- 1.3. It has been agreed with The terra firma Consultancy Ltd., who are acting on behalf of Lewes District Council, the Local Planning Authority (“the Council”).
- 1.4. This topic specific SoCG relates to an appeal by the Appellant against non-determination of an outline planning application for:
- 1.5. “...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 (“the Appeal Scheme”).”
- 1.6. The purpose of this topic specific SoCG is to set out the matters regarding the appeal proposals on which both parties can agree, in order that attention may then be focused on those matters that separate the parties in respect of the proposed development.

2. MATTERS IN AGREEMENT

2.1. This section sets out the landscape matters not in dispute between the Appellant and the Council.

2.2. Policy and Designations

2.2.1. It is agreed that no party in this appeal will assert that the Appeal Site is a valued landscape for the purposes of NPPF paragraph 187.

2.2.2. The site is not subject to any statutory or non-statutory landscape designations, such as National Park, National Landscape or any other locally defined landscape designation. The parties agree, however, that landscape was a consideration in the designation of the LGS. This will be explored in more detail at the Inquiry.

2.2.3. Approximately 56% of the district of Lewes, and the whole of the town of Lewes, is within the South Downs National Park.

2.2.4. The appeal site lies outside of, but directly adjacent to, the defined settlement boundary of Wivelsfield, as per Policy DM1 of the adopted Lewes Local Plan Part 2 (February 2020) (**CD-7.2**).

2.2.5. The Lewes Local Plan Part 2 (2020) (**CD-7.2**) (sub-section on Historic Environment), includes Policy DM34, 'Areas of Established Character', with an area along Green Road (east of Wivelsfield) included as such. The parts of the appeal site included in this policy area are limited. The appeal scheme does not propose built development in this policy area.

2.2.6. The Wivelsfield Neighbourhood Plan (2016) (**CD-7.4**), includes Policy 7, 'Local Green Spaces', with the land parcels between Wivelsfield (to the west) and Wivelsfield Green (to the east) included as such. The eastern part of the appeal site, between the public bridleway (WIV/30/1) and Wivelsfield Primary school are included in this policy area. The appeal scheme does not propose built development in this policy area, aside from a section of the proposed highways access of Green Road in the north-western corner of the Local Green Space.

2.2.7. The LPA will argue that the Local Green Space designation recognises the beauty and tranquillity of the designated portion of the Appeal Site.

2.2.8. Matters of appearance, layout, scale and landscaping are Reserved Matters, and further, detailed landscape design of the appeal scheme can be addressed as part of subsequent Reserved Matters applications. The LPA considers landscape design to be relevant at this stage to the extent that screening of the access road will/can be effective, and the extent to which that landscaping will compromise openness or adversely affect views across the LGS.

2.3. Approach and Methodology

- 2.3.1. The application was submitted with a detailed landscape and visual impact assessment (LVIA) prepared by Pegasus Group (December 2024) (**CD-1.7**).
- 2.3.2. The approach and methodology used for the submitted LVIA references best practice guidance including (but not limited to), the Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3).
- 2.3.3. The GLVIA3 is not a prescriptive methodology, nor does it provide a detailed 'recipe' that can be followed. The GLVIA also advocates the need to be proportionate in the approach to undertaking LVIA, and that professional judgement is an important part of this.
- 2.3.4. The LPA have not undertaken or prepared a detailed LVIA to support their evidence in respect of this public inquiry.
- 2.3.5. The LPA would like to acknowledge an error in the Proof of Evidence of Mr. Hird. Paragraph 1.3.2 of that evidence states that the approach taken by Mr. Hird in considering the Appeal proposals has been consistent with the methodology advocated by the '*Landscape Character Assessment: Guidance for England and Scotland*' as produced by The Countryside Agency and Scottish Natural Heritage (2002). This should in-fact have referred to '*An Approach to Landscape Character Assessment*', as produced by Natural England, (2014)'.
- 2.3.6. Following receipt of the Appellant's landscape rebuttal proof of evidence, the LPA also acknowledges the error in the Proof of Evidence of Mr. Hird, at paragraphs 2.1.8 and 5.2.6, which refer to Hundred Acre Lane as being at 'the eastern edge of the western part of the appeal site'. Hundred Acre Lane is in-fact at the eastern edge of the eastern part of the appeal site.
- 2.3.7. For completeness, the Appellant would like to acknowledge an error in the Proof of Evidence of Mr. Atkin, at Plate 3 and paragraph 2.2.16 which refers to the planning application for land to the south of South Road as reference LW/25/0527, whereas this should refer to application reference LW/21/0754.

2.4. Landscape and Visual Baseline

- 2.4.1. For context, broadly, the southern half of Lewes District is within National Character Area 125, The South Downs, and the northern half of Lewes District is within National Character Area 121, Low Weald. A very small area in the very north of the District, east of Haywards Heath, is within National Character Area 122, High Weald.

- 2.4.2. At a county level the site is located in a landscape character area (LCA) defined as the 'Western Low Weald'.
- 2.4.3. Landscape character of the District is defined in the Lewes District Landscape Character Assessment (2023). At this finer grain of detail, the appeal site sits within a more transitional area of landscape character, across the boundary of two LCAs. These include the C1 Wivelsfield, Newick and Challey LCA (the western areas of the site), and C3 Ditchling Common Western Low Weald LCA (the eastern areas of the site). The boundary between the two LCAs is broadly aligned with the route of the bridleway which links Green Road to Hundred Acre Lane (WIV/30/1).
- 2.4.4. This public bridleway (WIV/30/1) passes through the appeal site, to the east of the proposed development area.
- 2.4.5. Further west, a public footpath (WSM/1/1) passes through the western part of the appeal site. This route is part of an East Sussex County Council promoted route, the 'Wivelsfield Green Walk'. This is a 4.5 mile route which passes through both settled area, and areas of countryside.
- 2.4.6. A public bridleway (WSM/28/2) is situated immediately to the west of the appeal site. This route is part of the Sussex Border Path promoted route.
- 2.4.7. The LPA note that the submitted LVIA (**CD-1.7**) contains no specific viewpoint from WIV/30/1 looking East toward the LGS, or north/south within WIV/30/1 itself. The submitted LVIA does not specifically describe how views from within WIV/30/1 to the north and south would be affected.
- 2.4.8. In respect of the appeal site itself, its immediate landscape context is influenced by both the built form of the settlement area, and the agricultural context.
- 2.4.9. The designated Local Green Space is currently an agricultural field which is not currently in public ownership.
- 2.4.10. In addition to the published guidance on the landscape character baseline, LDC commissioned a Landscape Sensitivity Assessment (LSA) in 2023, prepared by AECOM on behalf of the Council. The study notes that LSA is a process to inform the strategic spatial planning and development / land management, and that this informs spatial planning by considering the principle of a particular type of change scenario based on generic development types. The study goes on to note that this differs to sensitivity defined within the GLVIA3, which refers to the sensitivity of the landscape in relation to a specific development.
- 2.4.11. The LSA defines two parcels relevant to the appeal site, with Parcel 'Wivelsfield Green E' addressing the western part of the appeal site, and 'Wivelsfield Green F' addressing the eastern part. The study concludes that Parcel E is of medium

sensitivity to small scale and medium scale residential development, but high-medium to large scale residential development. For Parcel F, the study concludes high-medium sensitivity for small scale residential development, very high sensitivity to medium scale residential development and very high sensitivity to large scale residential development.

2.4.12. For visual the visual baseline, the area reflects a well wooded character which, along with topography and settlement patterns, creates a strong degree of physical and visual containment, foreshortening and screening views across the landscape. The LPA considers, however, that there are unobstructed views across the open fieldscape of the Appeal site itself from several publicly accessible routes that pass through and immediately adjacent.

2.4.13. During the application process, the Landscape Architect for East Sussex County Council agreed the location of viewpoints that were included in the submitted LVIA.

2.4.14. The appellant considers that the visual receptors included in the submitted LVIA are a reasonable and proportionate representation for considering potential visual effects. The LPA does not agree this point.

2.5. Landscape Effects

2.5.1. Effects on landscape character defined at a Regional, County or District level are not considered to be significant.

2.5.2. The parties are in agreement that a section of the proposed access road between Green Road and public bridleway WIV/30/1, and vehicles using it, would to some extent alter the landscape context of the War Memorial that is situated on Green Road. The extent of the alteration will be discussed at the Inquiry, however the appellant considers this to be very limited given the existing context of Green Road.

2.5.3. The appellant considers that the significance of effects on both the 'LCA C3 Ditchling Common' (western parcel) and 'LCA C1 Wivelsfield Newick and Chailey' will be 'negligible adverse' at Year 1 and Year 15.

2.5.4. The appellant also considered that the significance of effect on the landscape character for the appeal site in its local context would be 'moderate adverse' at completion (Year 1), falling to 'minor to moderate adverse' at Year 15.

2.5.5. The council does not agree with these conclusions and will address landscape effects at the Inquiry.

2.6. Visual Effects

- 2.6.1. For visual effects, those locations on or immediately adjacent to the appeal site would be subject to the highest degree of impact and effect. There would be no significant visual effects on medium or long-distance views.
- 2.6.2. The parties are in agreement that a section of the proposed access road between Green Road and public bridleway WIV/30/1, and vehicles using it, would to some extent be visible within the landscape context of the War Memorial situated on Green Road. The extent of the alteration will be discussed at the Inquiry.
- 2.6.3. The parties are in agreement that a section of the proposed access road, and vehicles using it, would to some extent be visible within the landscape context of the WIV/30/1 public bridleway. the extent of the alteration will be discussed at the Inquiry.
- 2.6.4. Following receipt of the Appellant's landscape rebuttal proof of evidence, the LPA confirms that the photograph given as from WIV/30/1 was taken from outside WIV/30/1 to the immediate east. For clarity, the indicative photographs in the LPA's landscape proof of evidence were taken by Mr Dorfman at the direction of Mr Hird, who had by that stage previously conducted a site visit.

3. MATTERS IN DISPUTE

3.1. The following matters remain in dispute at the time of preparing this topic specific SoCG.

- a) The overall degree of ‘harm’ to the landscape and village character, taking into account effects on settlement pattern, aesthetic and perceptual aspects, sense of time-depth, and vegetation
- b) The degree of ‘harm’ to visual amenity within the context of the proposed development site.
- c) The degree of landscape and visual “harm” in relation to the designated local green space, taking into account effects on its openness and the reasons for its designation.

3.2. During the Inquiry the council will address the following matters:-

- a) A section of the proposed access road through the Local Green Space would be visible from several locations, including Green Road, Hundred Acre Lane and Bridleway WIV/30/1.
- b) The openness and tranquillity of the Local Green Space would be compromised by the presence of the section of the proposed access road, where this passes through it
- c) The section of the proposed access road through the Local Green Space and the proposed recreational use of this land would alter the agricultural qualities that are considered to be important by the local community
- d) The route of the proposed road would truncate Bridleway WIV/30/1, and in so-doing would compromise its landscape and visual amenity
- e) An increase to the depth of settlement would be perceived from the Public Rights of Way to the south of the existing settlement edge. This would compromise the perception of the linear settlement pattern that is typical of the low weald.

3.3. In response, the Appellant will address matters as set out in the submitted LVIA (**CD-1.7**), the evidence of Mr Atkin, and the rebuttal proof of Mr Atkin, related to various issues with the Council’s landscape evidence, prepared by Mr Hird.

4. AGREEMENT

- 4.1. This documents is accepted as the agreed topic specific Statement of Common Ground on landscape and visual matters, in respect of the appeal being consdired under PINS reference 6005671.
- 4.2. It has been duly signed by representatives of the Appellant (Taylor Wimpey UK Limited) and Lewes District Council.

Signed for on behalf of the Appellant:

Name:	James W Atkin
Signature:	
Date:	29 June 2026
Position:	Director

Name:	Martin Hird
Signature:	
Date:	29 June 2026
Position:	Associate