

Appeal Ref: APP/C1435/W/23/3335625

LPA Ref: WD/2022/3222/MAO

**Land South of the A271 and east of
the A22, Lower Horsebridge,
Hailsham, East Sussex BN27 4DN**

Landscape Proof of Evidence

For the appellant: Hertfordshire Holdings
Ltd

**tor
&co**

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Abbreviations

For ease of reference, the following abbreviations and short-hand terms are used throughout this proof of evidence:

‘the appeal’	the current appeal, ref APP/C1435/W/23/3335625
‘the appeal site’	the site subject to this appeal, located within the submitted red line boundary
‘the appellant’	Hertfordshire Holdings Ltd
‘the application’	the refused planning application, ref WD/2022/3222/MAO
BOA	Biodiversity Opportunity Area
CD	Core document
GLVIA	Guidelines for Landscape and Visual Impact Assessment
Knight’s Farm application	recent consent for development of a new Sports Hub, including two artificial football pitches etc on land at Knight’s Farm East, Lower Horsebridge (WD/2023/2100/DC)
Knight’s Farm Lighting Assessment	Visual Impact Assessment at Wealden Community Sports Hub (Alan Tulla Lighting, August 2023), submitted with Knight’s Farm application [CD11.4 and Appendix g]
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
PoE	Proof of evidence
PRoW	Public right of way
RfR	Reason(s) for refusal
SoC	Statement of case

SoCG	Planning statement of common ground, dated 11.03.24 [CD13.8]
WDC	Wealden District Council
ZTV	Zone of theoretical visibility

1.0 Introduction

- 1.1 My name is Paul Warren. I am a practicing landscape architect and masterplanner. I am a landscape architect and have been a Chartered Member of the Landscape Institute since 1993.
- 1.2 I have over 30 years of professional experience working for a number of private practices, principally on projects within the United Kingdom. Since 2003, I have been a Technical Director at tor&co, which has offices in Bournemouth, Birmingham and London. The practice is an integrated planning, design and environmental consultancy. I jointly manage the landscape architecture team and work alongside the urban design, architecture and planning departments.
- 1.3 From 1987, I worked at Glen Kemp Hankinson (now Hankinson Duckett), a landscape architecture practice based in Berkshire. Between 1988 and 1993 I worked at PTP Landscape in Bristol; and from 1993 to 1995 I worked for Adrian Lisney and Partners based in Dorset.
- 1.4 Since joining tor&co in 1995, I have been involved in landscape design, landscape planning and master planning of a wide range of projects many of them involving landscape and visual impact assessment including several housing sites of a similar nature to Lower Horsebridge.
- 1.5 I have been involved with the project from the outset. I first visited the appeal site and the surrounding area in June 2021 as part of initial studies and I returned in March 2022, July 2023 and March 2024. I have visited the site's local context and also its wider context. I visited the representative viewpoints in winter and summer conditions. I have walked the majority of the public rights of way from which views of the proposals are potentially available.
- 1.6 My evidence describes the proposals that relate to landscape and visual effects and sets out the predicted landscape character and visual effects arising from the proposals. It addresses the landscape related reasons set out in the Council's wide-ranging Reason for Refusal (RfR) 1 and WDC's Statement of Case (SoC).

- 1.7 The evidence which I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Scope of evidence

- 1.8 Section 2 sets out the relevant landscape planning policies.
- 1.9 Section 3 includes analysis of the most recent WDC landscape character and sensitivity documents that show that the appeal site is not in a rural or countryside location.
- 1.10 Section 4 describes WDC's proposals for development in the area of the site, that will impact on the wider landscape context and highlights WDC's description of their development context as urban rural fringe.
- 1.11 Section 5 focuses on landscape character, value and sensitivity matters that are central to the appeal. It identifies the landscape and visual receptors and assesses their value for the purposes of later assessment. It assesses the rurality of character area LC1.
- 1.12 Section 6 describes the development proposals and the design strategy
- 1.13 Section 7 set out the assessment of the predicted landscape and visual impacts of the development.
- 1.14 Section 8 addresses main reason for refusal (ii), the effect of the proposed development on the landscape character and appearance of the site and the surrounding area and the visual impact.
- 1.15 Section 9 addresses main reason for refusal (iii), whether the quantum of development proposed can be satisfactorily accommodated on site.
- 1.16 Section 10 contains my conclusions.

2.0 Planning policy

- 2.1 In RfR1 WDC cite a number of policies that it considers the proposals are contrary to. The policies relevant to landscape cited are summarised in the paragraphs below.

National planning policy

- 2.2 The current version of the NPPF (CD7.1) is dated 20 December 2023. At the time of the planning decision (30th June 2023), the extant version of the NPPF was 20th July 2021. Paragraph numbers relate to the current December 2023 version of the NPPF. The July 2021 NPPF version paragraph numbers (where changed) are shown in brackets and italics.
- 2.3 The relevant guidance contained within the NPPF that WDC cite in the RfR1 includes paragraph 8 (part c), relating to sustainable design environmental objectives), (paras.7,8 (a and b)), paragraphs 135(*130*), 136(*131*) and 139(*134*) relating to good design and trees and paragraph 180(*174*) relating to protection and enhancement of the natural and built environment.

Local planning policy

- 2.4 The following are saved policies in the Wealden Local Plan 1998 (CD5.1) and the Wealden District Core Strategy Local Plan 2013 (CD5.2).
- 1998 Saved Policy DC17 –Development in the Countryside-development outside development boundaries
 - 1998 Saved Policy EN14 – Landscaping
 - 1998 Saved Policy EN27 – layout and design criteria
 - 1998 Saved Policy EN29 – Light pollution
 - WCS13 – Green Infrastructure

Wealden Design Guide 2008 SPD (CD6.5)

- 2.5 RfR1 states that the proposals are not in accordance with the Wealden Design Guide 2008, adopted Supplementary Planning Document, namely Chapter 2 Section 3 (the Low Weald character description), Chapter 5 Section 8 (Detailed considerations) and Chapter 7 New Residential Development.

Hellingly Neighbourhood Plan policy LHB1 (parts i-v) (CD5.4)

- 2.6 Policy LHB1 is in five parts (i-v) and mostly relate to heritage, but policy LHB1 (iii) includes reference to key views and vistas (Map 4 of the HNP (extract in Appendix i) and part (iv) relates to erosion of the sense of openness and rural character of the existing setting of the settlement.

3.0 Review of WDC landscape and sensitivity assessments

- 3.1 The site is an area of field bounded by the busy A271 to the north and the even busier A22 and Boship roundabout to the west. Wrapping around the site to the east, the Lower Horsebridge stream forms the eastern and southern boundaries with beyond an extensive area of grassland pasture on the north side of the Cuckmere River extending eastwards. The area which I later characterise as LC1, forming the wider setting of the site, is enclosed by the somewhat suburban edge of Lower Horsebridge to the north side. On the south side of the river, developments including Welbury Meadows and Solent Close that have arisen over the past 10-20 years enclose the LC1 landscape to the south, the urban appearance softened by intervening planting in their associated public open spaces.
- 3.2 RfR1 states that the development would appear as a highly urbanised housing estate out of keeping with the rural location, but notwithstanding the fact that it is not a rural location, the existing developments south of the river demonstrate how development in the river corridor can be successfully integrated with the landscape.
- 3.3 WDC consistently state in their SOC under reason (ii) that the site is located in 'open countryside'. They describe the wider area of landscape within which the site is located as being connected with the wider landscape and characterise it as '*still evidently open countryside*'. The layout is described as '*unsuited to the rural location*' and it is a 'predominantly rural landscape close to the urban edge of Upper Horsebridge and Hailsham...'
- 3.4 The latter phrase is probably the closest that WDC get in their SOC to acknowledging the self-evident urban fringe location and character of the area centred on the Boship roundabout and extending through Lower Dicker.
- 3.5 In this Section I will demonstrate that WDC's own assessments curiously hint at, but never fully acknowledge the self-evident urban fringe characteristics of the area around the appeal site. I will also show that the most detailed and considered report commissioned by WDC on potential for development in the

local area considered that the site had development potential subject to certain criteria being met and that the appeal proposals closely match those criteria.

- 3.6 In Section 4, I will show that their own proposals and their own officer's reports in an unguarded moment show that WDC themselves do not regard the area of the site as rural or open countryside and are in the process of promoting developments in the proximity of the site that they must surely know will entirely alter and urbanise this area of north west Hailsham.

WDC documents and site promotions relating to the site character, value, susceptibility and sensitivity.

- 3.7 Before setting out my baseline assessment of the landscape value of the site and the area of surrounding potentially affected landscape, in the following paragraphs I set out evidence that supports my assessments of value, susceptibility and sensitivity of the landscape contained in three recent documents prepared by LUC on behalf of WDC and an older, but much more detailed and considered assessment prepared by the Landscape Partnership
- 3.8 These documents are: the Wealden Landscape Character Assessment May 2022 (CD9.1); the Wealden Landscape Sensitivity Assessment to Residential and Employment Development (2023) (CD9.2); the Wealden Landscape and Visual Appraisal - New Settlements and Large Urban extensions 2023 (CD9.3). and South Wealden Growth Area Landscape and Ecology Assessment Study Appendix 2.6 (CD9.13).
- 3.9 In addition, I describe the WDC proposals for a major Sports Hub less than 50m from the appeal site and a major employment site within 200m of the appeal site, both of which I believe are important considerations in assessing the imminent landscape change affecting north west Hailsham.
- 3.10 The four WDC documents and the WDC proposals all have a very significant bearing on defining the assessed character areas later in this section, defining what areas of the landscape are best described as having the characteristics of urban fringe or rural countryside and also on defining the susceptibility and sensitivity of the identified landscape and visual receptors in my assessment.

Wealden Landscape Character Assessment May 2022 (CD9.1)

- 3.11 Since writing the LVA, the Wealden Landscape Character Assessment May 2022 has been published and supersedes the previous WDC landscape character assessment, Wealden Landscape and Settlement Character Assessment 2014 by Chris Blandford Associates (CD9.12).
- 3.12 The appeal site is shown in its local context on Figure 1. It lies within Landscape Character Area LCA3A Uckfield to Hailsham Wooded Clay Vale. The character area shown in Figure 2 encompasses a swathe of mostly rural landscape between Hailsham and Uckfield and the site is on the edge of the Hailsham end of the area.
- 3.13 The first paragraph on page 73 acknowledges that *'The edge of the LCA is strongly influenced by its proximity to Hailsham and Uckfield'*.
- 3.14 The bulk of the assessment is highly focused on the rural areas of the character area with most of the description not reflecting the characteristics of the urban fringes including the appeal site. The sense is that the urban fringe areas including the appeal site have been 'bundled in' with the rural landscape areas as it geographically relates to that wider area and there was no other character area identified in the assessment to relate it to.
- 3.15 This perception is reinforced by the regular references to the areas adjacent to the urban edge being different to the majority of the area. Elements of the assessment that relate to the site are described below.
- 3.16 The final paragraph on page 78 of the section headed 'Historic landscape', states that modern additions to the landscape include...*'urban fringe development along the busy A22 and extending from the edge of Hailsham.... Light industry and other employment uses have grown up between Lower Dicker and Golden Cross.*
- 3.17 The first paragraph on page 78 of the section headed 'Perceptual character ', states...*'The A22, A26 and proximity to Hailsham and Uckfield reduces tranquillity and dark skies, and there are some areas with a suburban character*

between Lower Dicker and Golden Cross. Away from these influences, there are areas of tranquillity...'

- 3.18 Page 84 under the heading 'Forces for Change', identifies in a series of bullet points the perceived pressures on the Landscape Character Area. One of these is: *'Potential expansion of Uckfield and Hailsham into the LCA, and an increase in light industrial and urban fringe land uses, which would reduce the rural character of the landscape.'* The stated expansion, including the approved Sports Hub and/or promotion of a major employment site described in later paragraphs, is likely to occur. As predicted, these will inevitably reduce or remove rural character.
- 3.19 Figure 3 shows the historic pattern of growth in the area surrounding the appeal site with the final plan showing inclusion of the areas of existing and approved sites and sites assessed as suitable for development in WDC's SHELAA Appendix 4 Parish Summaries February 2024 (CD6.8a&b). Figure 4 shows the plan at a larger scale for clarity.
- 3.20 Character Area 3A is a predominantly rural area and most of the characteristics listed relate purely to rural elements. Only two briefly refer to the urban edges or highway effects and none specifically address the urban fringe areas at Hailsham and Uckfield.
- 3.21 Figure 7 shows the wider area of landscape providing the setting to the appeal site. In Table 1 in Section 5, I assess that area against the key characteristics listed for Character Area 3A which is very much described in terms of its rural character.
- 3.22 Table 1 (Section 5) demonstrates the limited extent to which the landscape setting of the appeal site meets the criteria for inclusion in Character Area 3A and does not share several of the key rural or countryside attributes. This transparent and methodical analysis has led me to conclude that the landscape within which the appeal site is located has a quite different character. It is not rural and it is not open countryside. In Section 5, I identify as a separate character area for the purposes of the landscape assessment.

- 3.23 In summary, the May 2022 Landscape Character Assessment places the appeal site within LCA 3A, but that assessment paints a picture of two distinct sub areas, one being the predominantly rural core and the other the Uckfield and Hailsham urban edge areas. Consistently throughout the character area descriptions, the urban edge areas, which the appeal site is located in, are described in terms of their urban influences without going as far as describing any area as urban fringe or urban-rural fringe.
- 3.24 That these areas are regarded as sub-rural is reinforced by the penultimate landscape guideline bullet point, '*Maintain the rural character of the landscape away from the large urban areas on the boundary of the LCA and the busy A22 and A26, retaining tranquillity and dark skies where present.*' Which suggests that the focus should be on retaining the truly rural character of the core rural landscape as the urban edge areas do not exhibit the majority of the rural characteristics of the core rural area. That would seem to me to be a reasonable strategy.
- 3.25 The sense that the WDC assessment of Character Area 3A struggles to include the urban fringe areas as part of that essentially rural character area is borne out by the subsequent emergence of the Wealden Landscape Sensitivity Assessment 2023 which identifies the areas that are at variance with the overall character area and creates a new assessment unit for them. This document is examined in the following paragraphs.

Wealden Landscape Sensitivity Assessment to Residential and Employment Development 2023 (CD 9.2)

- 3.26 The Wealden Landscape Sensitivity Assessment to Residential and Employment Development (November 2023) considers the relative sensitivity of the landscape to inform decisions on the location of housing and employment growth and subsequent allocation in the local plan and to guide consideration of individual planning applications.
- 3.27 The assessment is based on the landscape character areas as set out in the 2022 Landscape Character Assessment but paragraph 2.8, page 8 states that it

'makes a distinction between land that lies on the fringes of settlements and the wider landscape'. This subdivision is hinted at in several of the sections within the 2022 Character Assessment without definition, but in this later study, this subdivision is clearly defined as a zone around Hailsham.

- 3.28 The paragraph continues: *'This sub-division reflects that landscape character will often reflect greater urban influence in the vicinity of settlements and are areas where development is most likely to occur.'* Curiously, the detail of the assessment appears to carefully avoid any references to the urban influences that clearly prevail in relation to the various sites.
- 3.29 In this instance, the underlying character area LCA 3: Uckfield to Hailsham Wooded Clay Vale has been subdivided for the purposes of assessment into areas called 'assessment units'. The appeal site is located within assessment unit 'Hailsham West', the urban fringe around the west side of Hailsham. This area is shown in relation to other character areas on Figures 5 and 6.
- 3.30 This area is also illustrated in the appendices of the Sensitivity Study at Figure A.62: *Location of Hailsham West assessment Unit* on page A-97 of that assessment's Appendix. An extract of which is included at Appendix a of this POE.
- 3.31 The assessment tables on pages A-101 to A-103 of Appendix A assess the overall unit against a series of landscape related criteria.
- 3.32 The overall landscape sensitivity of the assessment unit as set out on page A-103 is:
- ***moderate sensitivity*** to small-scale residential development (defined as 2-2.5 storeys)
 - ***moderate-high sensitivity*** to medium-scale (defined as 3-4 storeys)
 - ***moderate-high sensitivity*** to commercial/industrial e.g. industrial units or hotels
- 3.33 The assessment for the West Hailsham Assessment Unit broadly reflects the urban fringe location and it is reasonable to expect variation in sensitivity for individual sites. However, when that assessment turns to the detailed SHELAA site assessments, there are very marked inconsistencies in the way that it has

dealt with the WDC-owned and promoted Knights Farm site compared to the area that includes the appeal site.

- 3.34 Knights Farm (SHELAA 1039/1310), lies in the West Hailsham Assessment Unit (but is in a relatively rural area of open countryside (see photo 13.2 on Figure 13)
- 3.35 SHELAA site 780/3000 which the appeal site is part of. The extracts for the sensitivity assessment for the two SHELAA sites are at Appendix b.
- 3.36 Referring to site 1145/3100, Knights Farm on page B-119, the reasoning cites proximity to the services and hotel reducing the sense of rurality and the A22 and A267 reducing tranquillity. The sensitivity rating given is reduced from 'moderate', to 'low to moderate' for small scale residential but the reasoning confirms that the sensitivity to medium scale housing and commercial/industrial are similar to the general Hailsham West rating of high to medium, which is at odds with its continued promotion as a major employment site. Also not addressed is the rural character of the majority of the site and the substantial impact a major employment site would have on the countryside which is described in tor&co's report 'Review of landscape and visual effects: Comparison of WDC Employment and Sports sites with Hertfordshire Holding's residential proposals at Lower Horsebridge. June 2023' at Appendix h discussed in Section 4.
- 3.37 Returning to the Hailsham West SHELAA sites assessment, referring to site 780/3100, which includes the appeal site at its western end, the assessment is moderate to high for small scale housing. The difference in assessment is justified in terms of the sensitivity of trees along the river corridor, its role in separation between settlements, views from the adjacent roads (Knights Farm sensitivity was adjusted downwards on the basis of proximity to the A22 and A267) and views from Brook House. The reasoning section then explains that the characteristics described result in a higher sensitivity to medium scale residential or commercial/industrial development types, but with no mention of small scale residential, which I assume remains at moderate. However, there is an inconsistency in the summary tabling which records only a score for small scale housing, which has been increased to moderate to high. Some

clarification is needed to confirm whether it is the table result that is correct or the text.

- 3.38 Returning to the overall Hailsham West assessment, it sets out 'variations' in landscape sensitivity (page A-103). These include:

'The Cuckmere River valley is an important landscape feature, and has a high degree of remoteness and tranquillity, and therefore a higher sensitivity to development.' and

'The land between Lower Horsebridge and Hailsham in the north is more sensitive to development, as development here could cause coalescence of the two settlements.'

- 3.39 The entire section of the river corridor contained within the West Hailsham assessment unit is described as having a high degree of remoteness and tranquillity. This clearly is not the case for the section that flows past the public open spaces in close proximity to developments on the northern edge of Hailsham.

- 3.40 Referring to Figure 7, the sections of the Cuckmere River valley west of the site/A22 and flowing away from Hailsham and the section of river approaching Hailsham from the north (east of the eastern section of A271 at Horsebridge), (areas C1 and C3 on Figure 7) are linked to the open countryside north and west of Hailsham and so do have a stronger degree of remoteness and tranquillity. So I agree that these characteristics would make those sections more susceptible to development and therefore more sensitive.

- 3.41 The 'middle' section of river, (area LC1 indicated on Figure 7) is in the area of landscape between Hailsham and the wider Hailsham urban fringes of Lower Horsebridge and Lower Dicker/Boship. The LC1 area is bounded by development and the A22 and A271 and does not have that countryside context.

- 3.42 Instead, it has a context of visible urban fringe development framing the corridor, softened by naturalistic planting. This characteristic is illustrated in the photographs on Figures 8, 9 and 10. Referring to the Natural England guidance; 'An approach to landscape sensitivity assessment' - to inform spatial

planning and land management' (CD9.7), the logical conclusion is that if a landscape already strongly exhibits a setting consisting of urban fringe residential development, then it will be less susceptible to new development of a similar nature.

3.43 In addition, the section of Cuckmere River valley corridor (which in terms of the wider defined corridor, includes the Lower Horsebridge Stream) forming the eastern boundary of the site is certainly far from tranquil as it has high intervisibility with, the A22, the A271 and the Boship roundabout and services.

3.44 The urban fringe context must make it less sensitive to the proposed development from a landscape aspect, as it would be of a similar scale and nature to the existing development form and therefore less susceptible to this type of change.

3.45 Turning to the point on sensitivity due to coalescence, there is an absolute flooding constraint that means that the flood zone 3 (and in practice 2) areas remove the possibility of coalescence and they have, (as stated on page A-97), been scoped out of the assessment. Coalescence is therefore not possible.

3.46 The reference to coalescence appears also to contradict the settlement description section on the same page (A-97), describing coalescence as having already occurred: *'the town has greatly expanded, predominantly to the north and west. This has resulted in its coalescence with the formerly separate hamlets of Lower and Upper Horsebridge and Amberstone to the north.'*

3.47 It is possible that reference relates to the gap between Lower and Upper Horsebridge being so reduced, that Lower Horsebridge is perceived as a part of Hailsham.

3.48 I refer later to the South Wealden Growth Area Landscape and Ecology Assessment Study (CD9.13), but that document, referring specifically to development of the appeal site says *'it is likely that the strategic gap between Lower Horsebridge and Upper Horsebridge/Hailsham could be maintained intact.'* The reasoning for this, referring to Figure 4, is that the appeal site development is connected to the Boship/Lower Dicker developed area and

therefore would not affect the gap between the edge of Hailsham and Lower Horsebridge.

Wealden Landscape and Visual Appraisal - New Settlements and Large Urban extensions (2023) (CD9.3)

- 3.49 The WDC New Settlements and Large Urban Extensions 2023 includes an assessment of land west of the A22 and some additional information on page A-42 relating to the perceived sensitivity of the A22 corridor and the sense of coalescence with Hailsham in assessing the sites west of the A22 '*In contrast Lower Dicker lies along the busy A22 and has some perceived sense of coalescence with Hailsham (due to ribbon development along the A22 and A271) which indicates a lower sensitivity.*'
- 3.50 The appeal site is adjacent to the A22 and A271 opposite some of the '*ribbon development*' described. I see the site as part of the Lower Dicker/Boship developed area and I would agree that if that indicates a lower sensitivity for the sites west of the A22 due to their association with Lower Dicker, which seems reasonable, that reasoning should apply to the appeal site which is effectively a part of the Lower Dicker/Boship area of development and within the Hailsham-facing side of the A22.

South Wealden Growth Area Landscape and Ecology Assessment Study - 2017 (CD9.13)

- 3.51 Appendix 2.6 of the South Wealden Growth Area Landscape and Ecology Assessment Study contains the finest grain of assessment relating to the site. It accurately portrays the wider SHELAA 780/3000 area which includes the site. The site assessment extract from the report is at Appendix e. The version available on the WDC website has not fully included the figures so these are presented as found.
- 3.52 The report states a moderate to low capacity for the overall area due to its role in separation between Lower Horsebridge/Hailsham and in providing the setting for the northern edge of Hailsham. It describes the Cuckmere River as a landscape feature with high sensitivity and describes the relatively low visibility from the surrounding area as reducing the general sensitivity of the site.

- 3.53 The report then describes two *significant variations* in sensitivity within the site. One is the higher sensitivity of the river and adjacent pasture in the southern and eastern parts of the site within flood zones 2 and 3. The other relates directly to the appeal site and states *'The western corner of the site adjacent to the A267/A22 roundabout junction is less sensitive and is not in flood zones 2 and 3.'* The report then goes into some detail under the heading 'Potential landscape and visual impacts if the site is developed'
- 3.54 The first point made is that development across the whole site would erode the gap between settlement areas. This is then qualified with the fact that this is not possible due to the extent of flood zones 2 and 3.
- 3.55 The report then suggests; *'If a small scale development were accommodated in the western corner of the site (in the area outside flood zones 2 and 3) (i.e. the appeal site), landscape effects would be more limited.'*
- 3.56 The report says that development in this area would *'diminish the pastoral character of the site to some extent'* and *'affect the character of the PRoW by increasing the extent of built edge along the river corridor'*. Neither of these effects would seem to me to result in more than moderate harm to the character of the wider area. Views of built edge are already a key characteristic of the views experienced from the PRoW as evidenced in the photographs on Figures 7, 8 and 9 and once the landscape is established, the proposals would appear very similar to those existing built edges as shown in the visualisations from the PRoW (Figures 16, 18 and 19).
- 3.57 The report states that *'it is likely that the strategic gap between Lower Horsebridge and Upper Horsebridge/Hailsham could be maintained intact.'* I agree with that statement and this is illustrated in my Figure 4 where I have indicated the existing gap dimensions and also shown the 116m gap between the development and Lower Horsebridge which is very similar to the 128.5m gap between Lower Horsebridge and Hailsham, at the eastern end of the wider SHELAA site.
- 3.58 The gap between Hailsham and Lower Horsebridge would not be diminished as the developed area does not intervene between those two settlements. Instead, the proposals would assimilate with the development associated with

Lower Dicker and Boship. The report agrees, stating that '*development in this area could form a continuation to the existing concentration of development around the A22/A271 roundabout junction.*'

- 3.59 The report suggests mitigation measures to address potential landscape effects including suggesting the best location would be on the western side outside flood zones 2 and 3, which is the where the proposed development is located. It suggests retaining the river corridor as a pastoral landscape, which the majority of the wider site would remain as, and creating a landscape buffer between the PRow and the development, which is included in the proposals. It also suggests retention of the peripheral vegetation of the wider site. In relation to the appeal site, the only vegetation removal would be the low clipped hedgerow on the boundary with the A271, which would be removed to enable the required highway improvements and access.
- 3.60 The final mitigation point in the report concerns '*designing development with a scale and character appropriate to the landscape character and context of the site*'. Although, with the exception of access details, the design is illustrative it recognises the landscape context and seeks to address it positively with appropriate scale and form whilst making best use of the land. The details of how this is envisaged is set out in Section 6, describing the proposals.
- 3.61 The following Section 4 looks at WDC's own proposals and plans for north west Hailsham in the immediate area of the site.

4.0 WDC's significant proposals in the immediate area of the appeal site

- 4.1 This section looks at the way in which WDC's plans for the area will impact on the landscape character and how they will substantially alter and expand the pattern of development in north west Hailsham.
- 4.2 WDC has promoted and has resolved to approve the Knights Farm Sports Hub application and WDC are also promoting the proposed Knights Farm major employment site. Both projects show the intention to expand development in north west Hailsham and highlight the different standards that appear to have been applied in terms of describing the landscape character and considering the landscape and visual effects.
- 4.3 Figure 3 shows the historic growth of the north west Hailsham area and the increasing urbanisation which has altered the landscape character. The last plan on Figure 3 and the larger scale version on Figure 4 shows the numerous SHELAA areas in Lower Dicker deemed suitable for development and also approved areas of development. This provides a picture of the future baseline landscape context for the site and it does not look rural.
- 4.4 The Knights Farm employment site is a very large area (42.7ha) of currently open countryside (see photograph 13.2 Figure 13). It is just 200m north west of the appeal site, but more remote from Hailsham i.e. beyond the current Hailsham developed edge of Lower Dicker and Boship. It will remove a large area of what I would describe as genuine open countryside which the Hailsham West assessment does not address. The site was marketed by WDC in 2023 seeking a development partner for this future major employment site. The tender appears now to have been awarded.
- 4.5 WDC recently 'resolved to approve' their application for the Sports Hub at Knights Farm (east), which is another large site, a short distance from the appeal site on the north side of the A271. It is in an area of open fields with, compared to the appeal site, substantially less visible development detracting from its rural character and therefore has a much stronger rural character than the appeal site.

- 4.6 Like the major employment site, it is self-evident that it too is beyond the current developed edge of the north west Hailsham urban fringe. Intensively lit, the site will include twelve 15m high floodlights for the main pitches as well as numerous other light sources, eight 10m high columns for illuminating the tennis and netball courts (two of these approximately 15m from the rear garden boundary of Brook House) and 6m columns for the roads and car parking.
- 4.7 The lighting assessment extracts at Appendix g, show an ambiguity regarding whether the intensity of the light (4,181 candela) for 'Observer 4' i.e. Brook House, is acceptable. However, the summary on page 9 appears to clarify, stating '*Glare and light spill onto nearby housing is within the limits recommended by the ILP guidance on Obtrusive Light for pre-curfew conditions. They do not conform to the ILP guidance during post-curfew hours.*' This seems far in excess of the light levels expected in a rural area.
- 4.8 The lighting assessment is titled 'Visual Impact assessment' but stops short of actually assessing the impact on the area beyond the site and the wider countryside. The summary on page 9, states '*It is inevitable that the floodlights on the 15m high columns could be seen at night from a distance*'...and '*A zone of Visual Influence will show any affected areas*'. The WDC application did not include any zone of visual influence to test this potential impact on the surrounding countryside. However, tor&co have prepared a landscape report (Appendix h) which studied the potential landscape and visual effects of both the Sports Hub and the employment site.
- 4.9 As part of the tor&co report on the above WDC proposals, ZTVs of the lighting columns for the Sports Hub and of potential buildings in the employment site were prepared. At the time of the report, the heights of the columns were not known and locations were based on preliminary information. The lighting mast heights used for the ZTVs were conservatively estimated at 11m.
- 4.10 11m high lighting masts were found to impact visually on the area of rural landscape to the north towards Boggy Farm and Broad Farm 1km to the north and Caldicotts Farm and Wood to the north west.
- 4.11 The tor&co report found that the areas that would be most affected by the proposals are currently very rural in character, with a good level of tranquillity

and sense of remoteness and have very little influence from the effects of existing development. Therefore, introducing new non-rural elements such as tall lighting masts and a highly illuminated area glowing on the edge of Hailsham would significantly detract from that rural character and sense of remoteness.

- 4.12 Subsequent to this report, when the details of the application were available after submission, the height of the twelve main pitch floodlight masts were found to be 4m higher than the assumed 11m and a new ZTV for 15m high masts (Appendix h) found there would impact on a much wider area of countryside than assumed in the tor&co report. Areas impacted include the HNP 'Area of Locally Valued Landscape' and the Hellingly Conservation Area.
- 4.13 Both the recently approved Sports Hub at Knights Farm (east) and the major proposed employment site at Knights Farm (west) are both examples of industrial and urban fringe uses promoted directly by WDC, which illustrate the planned and imminent expansion of north west Hailsham and the further reduction of rural character in this urban edge part of the LCA, which is already acknowledged as being influenced by the urban area of Hailsham and the A22/A26.
- 4.14 In the instance of the Sports Hub application, given WDC's stated sensitivities of the landscape, it is surprising that there is no landscape and visual appraisal or LVIA as part of the application, to inform the masterplanning of the site and to minimise impacts.
- 4.15 The recent officer report dated 25th January 2024 (CD11.1 and Appendix f), perhaps in an unguarded moment, describes the site (quite accurately) as being *'in an edge of settlement location in the urban-rural fringe.'* and *'on the edge of Hailsham'.*
- 4.16 If the Sports Hub is in the urban rural fringe or the edge of Hailsham, which it self-evidently is, then logically, given the appeal site is even closer to the urban area; the appeal site must also be in the urban rural fringe and within Hailsham.

5.0 LANDSCAPE AND VISUAL RECEPTORS

- 5.1 This section should be read with reference to the LVA submitted in support of the planning application. A full description of the appeal site and the wider area is provided within the Planning SoCG. My description of the appeal site and the surrounding landscape context focuses on issues relevant to the landscape and visual matters in dispute, its degree of urban influence and character and the value and potential susceptibility and sensitivity of the receiving landscape and views.

Identification of the relevant landscape character areas

- 5.2 In my LVA, written prior to the introduction of the Landscape Character Assessment for Wealden District May 2022, I assessed the impacts on the appeal site and on two character areas from the Wealden Landscape and Settlement Character Assessment 2014 (CD9.12), LCA-E6 Hellingly and LCA-D6 Upper Dicker, shown on Figure 8 of the LVA (CD1.14).
- 5.3 The introduction of the Wealden Landscape Character Assessment May 2022 (CD9.1) and the subsequent Landscape Sensitivity Assessment - Residential and Employment Development (November 2023) (CD9.2) and the Landscape and Visual Appraisal - New Settlements and Large Urban extensions (November 2023) (CD9.3) as well as the Sports Hub and major employment site analysed in Section 4, point to a different way in which WDC regard the landscape context of the site and are all indicative of the imminent changes to this area of Hailsham and therefore relevant to the consideration of landscape value, sensitivity and assessment of landscape impact.
- 5.4 Figure 7 shows the wider area of landscape providing the setting to the appeal site. In Table 1 below, I assess that area against the key characteristics listed for Character Area 3A, which is very much described in terms of its rural character.
- 5.5 Table 1 demonstrates the limited extent to which the landscape setting of the appeal site meets the criteria for inclusion in Character Area 3A and does not share several of the key rural or countryside attributes. This transparent and methodical analysis has led me to conclude that the landscape within which the

appeal site is located has a quite different character. It is not rural and it is not open countryside.

Table 1 Assessment of degree to which tor&co character area LC1 including the appeal site exhibits key characteristics of LCA 3A Uckfield to Hailsham Wooded Clay Vale. Refer to Figures 5, 6 and 7	
LCA3A Uckfield to Hailsham Wooded Clay Vale Key characteristics	Degree to which LC1 including the appeal site exhibits same characteristics
The underlying geology of mudstones, siltstones and sandstones give rise to a gently rolling landscape, dissected by the narrow river valleys of the Uck, Ouse and Cuckmere.	The appreciation of the topography is possible within LC1 but the wider topography beyond is masked by the enclosing developed areas. The impression is not of a gently rolling landscape Moderate
A well wooded landscape containing small broadleaved woodland blocks and copses, with extensive mixed plantations at Abbot's Wood and Vert Wood. Much of the deciduous woodland is priority habitat with a high proportion of ancient woodland, including Plashett Park Wood, a designated SSSI.	LC1 has a small area of woodland and trees along the river corridor but surrounding trees in the context of the site are associated with the A22 and development areas which have a very different character, composition and context to the rural woodland blocks and copses described. Low-moderate
Scattered pockets of remnant semi-natural grassland provide valued habitats for birds and invertebrates, with grasslands at Park Corner Heath designated as a SSSI.	LC1 grassland is described in the ecology report as improved, in poor condition. However, there are trees along the riverside and new biodiversity led landscape on the south bank provides new habitat, but these are not remnant wild areas. Low-moderate
Fields are varied in size and origin, ranging from sinuous irregular medieval 'assarts' (fields formed by cleared areas of woodland) located on the edges of existing woodlands, regular or semi-regular medium to large scale fields derived from planned private or piecemeal enclosure around Lower and Upper Dicker, as well as some larger modern fields.	The Historic Landscape Characterisation shows the appeal site and area of river corridor to the east as open fields, which is the description for most of the other surrounding areas including Knights Farm sites. Remains of an assart at Solent Crescent, remains of planned/private enclosure at Welbury, but both assets largely compromised by development.

	Low-moderate
The heavy clay soils give rise to a mixed land use of sheep and cattle grazing and arable cultivation. Fields are bound by hedgerows, and mature hedgerow trees are common.	LC1's north bank is periodically used for sheep grazing. It has some boundary hedgerows. some remnant mature trees Moderate
A small-scale pattern of historic rural hamlets and villages with scattered Farmsteads, many of which are listed buildings. Muddles Green is the only village covered by a Conservation Area, although the Conservation Areas of Hellingly and Arlington extend into the LCA. Village and Farm ponds are common.	This description, painting a picture of a rural landscape, does not reflect the site context of the A271 and A22 including the service station and roundabout) forming the immediate north and west boundaries, urban fringe development to the south and east and 20th C development which has a suburban character at Lower Horsebridge forming the context to the north. Brook House is however an exception. Low-moderate
An estate character in places, built by families made wealthy through the Wealden iron industry, with small country houses with parklands at Plashett Park, Bentley Farm and Horsted Place, the latter with gardens designed by Geoffrey Jellicoe, now a Registered Park and Garden.	LC1 has no known association with traditional estate character. Low
The network of rural roads, lined with clipped hedgerows and mature trees, contrasts with the busy A22.	Both the A22 and A271 are busy roads and are not rural. The A271 and part of the A22 boundaries have a clipped hedge. Trees on the A22 section are not mature hedgerow trees but are maturing highway planting. Low
A strong network of public rights of way including the promoted routes of the Vanguard Way and the Wealdway and public access across Vert Wood and Abbot's Wood.	There is a public right of way on the northern side of LC1 that is approximately 20m north and east of the appeal site at its closest point. This is not a promoted route. There is public open space on the south banks. Moderate
The woodland, hedgerows and trees result in an enclosed landscape, although the distinctive ridges of the South Downs are visible to the south and south-west, while the High Weald provides a wooded backdrop to the north.	Views of the South Downs from LC1 are limited to higher ground near the recreation area. Enclosure is chiefly provided by the surrounding developed areas and highway related vegetation so the views are experienced in a quite different context. No view of the High Weald. Low

A rural landscape with areas of tranquillity and dark skies, although this decreases with proximity to Hailsham, Uckfield and the A22/A26.	LC1 has some rural <u>components</u> such as field area, hedgerows and a small woodland, but its context immediately adjacent to two busy A roads, a busy roundabout, service station and visible urban fringe development means that it has a distinct urban/rural fringe character. Low tranquillity, low dark skies Low
Conclusion of assessment of landscape characteristics LC1 was once part of the wider rural landscape and therefore exhibits rural components such as hedgerow woodland and field area. Some of these have been integrated successfully into the public open space on the area south of the river. The river corridor is a sensitive feature, central to the character area and in the LC1 area it flows relatively close to the developed areas and so has lost its original rural setting and now has an urban/rural fringe character. The growth of Hailsham, the impending development of the Sports Hub and the intended development of the major employment site at Knights Farm will isolate LC1 further from the genuinely rural landscape to the north. With regard to tranquillity and dark skies, LC1 is in close proximity to developed areas and highly lit A roads, resulting in low tranquillity and reduced dark skies. Once completed, the adjacent Sports Hub will add considerably to the ambient lighting experienced within LC1 and adjoining areas, as demonstrated in the ZTV for the proposed 15m height floodlighting discussed later in this proof. On average the LC1 area would appear to score on the low side of low-moderate	

- 5.6 My assessment in Table 1 of the degree to which the appeal site and its wider setting LC1 show that is not rural and it is not open countryside. The experiences of visiting the site and the immediate area reinforces this fact, is seen in photographic evidence in Figures 9, 10 and 11 and is quite self-evident.
- 5.7 LC1 is in contrast to the area of countryside north of the A267 and north west of Lower Horsebridge which is experienced as a much more tranquil, dark and rural landscape. I describe that area of landscape later in Section 4 of my POE, as it would be adversely affected by lighting from both the Knights Farm application area (Community Sports Hub proposal) and also by any potential future development on the substantial area of land identified as suitable for employment development in the SHELAA Parish Summaries February 2024. (CD6.8).
- 5.8 Referring to Figures 5, 6 and 7, I have identified three character areas for the purpose of assessment of landscape character. Character area 6E High Weald was scoped out of this assessment as based on the LVA ZTV (Figure 9) and study of view 10 (Figure 20), I concluded no or negligible changes in the setting of that character area arising from the proposals.
- 5.9 The areas selected for assessment are mostly derived from the Wealden Landscape Character Assessment (CD9.1), the Landscape Sensitivity Assessment (CD9.2) and tor&co's own assessment of the area. The areas named LC1 to LC3 are:
- LC1 - Area of open land in an urban fringe setting that is bounded by the A22, the A271, development south of the river and Lower Horsebridge north of the river. The appeal site is part of this area.
 - LC2 - Hailsham West assessment unit (excluding the part of LC1 within it)

- LC3 - Landscape Character area 3A Uckfield to Hailsham Wooded Clay Vale (area of 3A of genuine rural character excluding LC2, the Hailsham West assessment unit).
- 5.10 Tables 2, 3 and 4 set out the landscape value of these areas. The tables are based on Table 1 in the Landscape Institute Technical Guidance Note 02/21 Assessing landscape value outside national designations (CD9.5) The assessed landscape values are considered alongside the susceptibility of the landscape receptor at the assessment stage to arrive at an overall assessment of receptor sensitivity. The overall sensitivity is then considered alongside the magnitude of change to reach a judgement on the significance of the effect.
- 5.11 Section 7 assesses the effects on these landscape receptors of the development described in Section 6.
- 5.12 The following paragraphs describe the key characteristics of L1 to L3 areas and the landscape value assessments for each are set out in tables 2, 3 and 4.

LC1 Area of open landscape with an urban fringe setting including the appeal site

- 5.13 The appeal site and the area forming its landscape context are shown on the plan on Figure 7 and photograph sheets Figures 8, 9, 10,11 and 12. The appeal site is on land immediately east of the A22 Boship Roundabout and its associated development.
- 5.14 The site is predominantly an area of improved pasture lying in a corner of the wider LC1 character area bounded by the busy A271 to the north and the even busier A22 and Boship roundabout to the west.
- 5.15 Wrapping around the site to the east, the Lower Horsebridge stream forms the eastern and southern boundaries. Public access to LC1 is restricted to a public footpath that runs between the western section of A271 to the eastern section of A271 and its route follows part of the southern boundary of Lower Horsebridge.
- 5.16 The site features include an area of broadleaved woodland, an individual tree, areas of scrub, hedgerow and trees on the A22 boundary, a hedgerow on the

A271 boundary and the eastern boundary is a tributary watercourse, the Lower Horsebridge Stream that feeds into the Cuckmere River. The remaining area of LC1 is predominantly improved grassland with some trees, scrub and hedgerow on the northern side of the Cuckmere River but has a much richer mix of natural habitats in the area of public open space on the northern side of the river.

- 5.17 The appeal site is the part of LC1 most affected by the adjacent highways and traffic as it is affected on two sides and is also adjacent to the roads. The sound and view of traffic and development visible along the A271 and around the Boship roundabout means that this corner of LC1 does not have a strong pastoral character and has distinct urban edge characteristics and perceptual qualities including noise, kinetic movement of traffic and numerous light sources.
- 5.18 The enclosure of the LC1 area including the appeal site is an important factor in determining the identity and character of the character area and is key to understanding how the landscape and visual effects of development would be effectively restricted to this relatively small part of the landscape. The character of the enclosure, predominantly from development and vegetation is also key to understanding the capacity of the site to accommodate the development. The following paragraphs describe this enclosure in more detail.
- 5.19 The A22 and Boship roundabout form the appeal site's western boundary. Most of the boundary is well screened by maturing roadside vegetation but there is a section of low hedge close to the Boship roundabout that allows intervisibility between the site and the busy roundabout. Vegetation in the grounds of the Boship Lions Hotel and a concentration of tree cover in the land west of the Boship Lions Hotel combine to enclose the site and Boship roundabout from the area of countryside to the south of Lower Dicker.
- 5.20 The A22 and its strong lines of vegetation also enclose the wider LC1 area, visually and physically isolating it from the open countryside extending west of the A22.
- 5.21 The section of A271 between Boship roundabout and Lower Horsebridge forms the northern boundary of the appeal site formed by a low hedgerow. Development and vegetation along the west side of this A271 corridor provide a

good visual barrier to the rural landscape lying further to the north and north west, helping to enclose the appeal site from wider views. Only glimpses of the appeal site from the wider rural area to the north and north west limited sections of the public rights of way are gained due to the effectiveness of this visual enclosure. There is however a clear view of the site from the A271 arm of the roundabout in which the appeal site is viewed jointly with the wider LC1 area, as an open area of pasture, with areas of enclosing development visible. This view (view 4) is discussed in more detail in section 7.

- 5.22 In the event of both or either of the previously described Sports Hub or the major employment site being developed, this would increase the urban fringe character of the site's context.
- 5.23 The eastern boundary of the appeal site is formed by the Lower Horsebridge Stream and is open to the area of pasture that is part of the wider LC1 area extending to the east.
- 5.24 Lower Horsebridge is (at its closest) 30m north and north east of the appeal site. The southern edge of Lower Horsebridge is of mixed appearance with some properties partly or fully screened by vegetation and others more starkly visible. This developed edge closest to the site has a suburban rather than a traditional village character. The combined effects of vegetation and development in Lower Horsebridge visually enclose the appeal site to the north and minimise views from the area of countryside north of Lower Horsebridge.
- 5.25 The edge of Lower Horsebridge extending further east includes the distinctive poplars on the boundary with the recreation ground and further east includes a large substation which is a detracting element close to the eastern section of the A271 that loops through Lower Horsebridge. The wider LC1 area, including the site is therefore well enclosed to the north by Lower Horsebridge and has very little visual connection with the wider landscape beyond the village.
- 5.26 At the eastern end of LC1, where the A271 crosses the Lower Horsebridge stream, there is some intervisibility with the field enclosed by woodland east of the A271, which has a more rural character to it, but the woodland enclosure prevents a sense of a strong connection with the wider landscape.

- 5.27 The north west part of Hailsham comprises relatively recent developments south of the Cuckmere River (including Welbury Meadows 240m to the south east, Solent Crescent 280m to the east and Cuckmere Close 430m to the east).
- 5.28 These developments have a strong landscape structure part designed and part retained vegetation and although visible, the effects of the development are softened. The density of planting in these areas of open space south of the river contrasts with the more open pasture landscape north of the river, but the enclosing effects of the development and vegetation give a sense of a unified green corridor enclosed by soft/green edged development.
- 5.29 The proposed area of development occupies the westernmost portion of the site, adjacent to the developed environment centred around the Boship roundabout and extending west along the A22.

Landscape value of LC1

- 5.30 Table 2 assesses the landscape value of area LC1

Table 2: Landscape value assessment - Character Area LC1	
Landscape value criteria	Prevalence in character area
Natural heritage	The LC1 area has a mixed range of habitats. The river corridor, defined as a BOA (biodiversity opportunity area) is central to the area and in itself is a high sensitivity feature. On the north side, the majority land cover north of the river is improved grassland of poor condition. There are significant areas of richer habitat particularly on the part south of the river associated with the open space for the developments that frame LC1 to the south. The appeal site is mostly improved grassland but has an area of mature broadleaf woodland, ponds and hedgerow. The boundary tributary stream has potential for enhancement. Medium
Cultural Heritage	Brook House, Grade II listed, overlooks the appeal site and on the edge of LC2 adjacent to LC1. The Hellingly Neighbourhood Plan defines views and vistas from Brook House and the A271 into the area. The field area of the site is noted by the HLC as part of informal fieldscapes so has some historic continuity, but no more than most other areas of fields in the district. The appeal site area has been amalgamated from three smaller fields in the 20th

	century. There is a 20th century pillbox close to the river. Weak visual/physical connection with Boship Hotel also Grade 2 listed. Medium
Landscape condition	Landscape appears in generally fair condition although the ecology reports site grassland and other habitats on the site are in poor condition. The woodland in the appeal site is lacking management. Detracting influences include visible development, traffic, noise and light sources. Low level of intactness for remnant rural elements Medium
Associations	No significant associations known. Low
Distinctiveness	Sense of mixed identity, main identity element is the open character of LC1 and its enclosure by vegetation and development. River is distinctive, although often not visible or perceived. Includes some rural features so mixed urban/rural elements reduce distinctiveness. The appeal site is probably the least distinctive part of LC1 with pastoral site components at odds with the highways and development influences. Medium
Recreational	Public open space south of the river is well used. The public footpath on the northern part of LC1 enables views over the space, mainly directed southwards to the more extensive extent of landscape to the south and in some locations views to the South Downs. There is no public access to the appeal site and it is physically isolated from the rest of LC1 by the tributary stream. Medium-High
Perceptual (scenic)	Area LC1 has moderate scenic qualities due to the openness, but visible development is part of that scenery and the surrounding influence of development and the busy roads and the substation at the eastern end of LC1 means that is not perceived as rural or countryside but has an urban fringe natural open space quality. The appeal site is the least scenic part of the area due to the proximity of detracting elements. Some views to the South Downs. Medium
Perceptual (wildness and tranquillity/dark skies)	Although there are rich habitats in part of LC1, those parts are close to residential development and are far from wildness. The improved grassland area is pleasant, but does not have a wild character. Tranquillity is somewhat improved in the central part of LC1 away from traffic noise but that central area will experience lighting from the surrounding area including floodlighting at the recreation ground. The appeal site is probably the least tranquil part of the area, with a combination of continuous traffic movements, noise and lighting from street lights and vehicles. This affects a large proportion of the site.

	The future Sports Hub lighting a short distance to the north west which will be experienced from the LC1 area will further reduce dark skies and tranquillity. Low sense of remoteness and seclusion, but some openness. Low
Functional	Provides hydrological function as floodplain and is likely to have improving soils in the relatively new biodiversity-led public open spaces south of the river. Medium-High
Assessment conclusion	Whilst some of the LC2 area retains pockets of attractive intact rural landscape, other parts are strongly influenced by the network of transport routes and development at Boship and Lower Dicker reducing its sense of tranquillity and presenting an urban/rural fringe character, the area performs only moderately for many of the criteria and therefore its value is assessed as Medium .

Landscape value of LC2

- 5.31 LC2, Hailsham West Assessment Unit (excluding the part of LC1 within it) is described and defined in the Wealden Strategic Landscape Sensitivity Assessment November 2023.
- 5.32 The assessment includes commentary against landscape sensitivity indicators and that combined with area knowledge and character assessment information informs my value assessment in Table 3 of the landscape value of area LC2.

Table 3: Landscape value assessment - Character Area LC2

Landscape value criteria	Prevalence in character area
Natural heritage	Area mostly fields, hedgerows and woodland, with river valley in part west of site as BOA but that is about potential for enhancement rather than intrinsic natural heritage value. Area of LC2 most likely to be affected by the proposals around Boship roundabout is relatively poor in terms of natural heritage and part degraded around Lower Dicker. Medium
Cultural Heritage	Brook House and Boship Lions Hotel are two listed buildings close to the appeal site that are on the edge of LC2. As set out in the value assessment for LC1, Brook House has a clear visual connection

	with LC1, The Boship Lions Hotel has a weak visual relationship with the site. The field areas are mostly noted as part of informal fieldscapes in the HLC. Conservation area at Hellingly, although not impacted by proposals. Medium
Landscape condition	Landscape condition varies, with deteriorating condition around Lower Dicker but good condition around more rural parts. Medium
Associations	No significant associations known. Low
Distinctiveness	Underlying identity of original rural landscape eroded in parts by major roads and indistinct character of development at Lower Dicker. This lack of distinctiveness likely to worsen with Sports Hub and major employment at Knights Farm further eroding remaining rural elements and increasing urban influences further into areas that are currently relatively rural. Low
Recreational	Fair provision of public footpath although many overgrown in area north of Lower Dicker. Due to relatively low tranquillity, reduced recreational value, although does have section of Weald Way. Medium
Perceptual (scenic)	Limited scenic value due to too many detractors including major roads and indistinct character of much of landscape. Best scenic areas south of the A22 and south of Hellingly, both on Weald Way. Area extending from Knights Farm northwards also scenic but this area would be entirely altered by the major employment site proposals. Medium
Perceptual (wildness and tranquillity/dark skies)	The part of the area most affected by the proposals is also probably the least tranquil and brightly lit due to street lighting and the service station centred on the Boship roundabout and the A roads. Low
Functional	Provides functions of floodplain to south of A22 and south of Hellingly. Medium
Assessment conclusion	Whilst some of the LC2 area retains pockets of attractive intact rural landscape, other parts are strongly influenced by the network of transport routes and development at Boship and Lower Dicker reducing its sense of tranquillity and presenting an urban/rural fringe character, the area performs only moderately for many of the criteria and therefore its value is assessed as Low to Medium .

Landscape value of LC3

5.33 There would possibly be negligible effects on the character area in a very few locations and due to the distance a not readily perceived amount of development visible. I have nonetheless assessed the value of LC3 in Table 4 below.

5.34 Table 4 assesses LC3 - Landscape Character area 3A Uckfield to Hailsham Wooded Clay Vale (area of 3A excluding Hailsham West assessment unit). It is a large area with extensive description in the character assessment. As there would appear to be none or negligible intervisibility with the proposals and it is clearly a predominantly rural character area, a summary value assessment is provided.

Table 4: Landscape value assessment - Character Area LC3	
Landscape value criteria	Prevalence within part of character area affected by the proposals.
Natural heritage	Good and extensive woodland habitats but some declining, some semi-natural habitats, SSSIs High
Cultural Heritage	Michelham Priory, listed buildings Conservation area at Hellingly. Parkland areas. High
Landscape condition	Mostly good but in poorer condition in proximity to road corridors and from equestrian. Medium
Associations	No significant associations known. Low
Distinctiveness	More distinctive in more rural parts where traditional landscape pattern retained, becomes indistinct particularly along A22 corridor Medium-High
Recreational	Range of recreational opportunities chiefly walking, riding and other outdoor activities High
Perceptual (scenic)	attractive scenic landscape in more rural parts and river valleys. Views to the South Downs High
Perceptual (wildness and tranquillity/dark skies)	Away from main roads and main settlements there are significant areas of dark skies Medium-High
Functional	Valleys performing hydrological role, some wilder areas and woodland. Medium-High

**Assessment
conclusion**

Most of LC3 retains a rural character, but there are several pressures on key characteristics such as settlement pattern and traditional Farming methods.
Medium - High

Identification of visual receptors

Visibility of the site

- 5.35 The LVA identified views and visual receptors and on review of that section of the LVA, I believe the identification was sound and so the same receptor groupings are used for this POE. On review of the LVA text, there was some interchangeability in the descriptions of the site enclosure and its wider area of river corridor/urban fringe open landscape setting that I have identified as LC1 in this POE. The POE makes clear the distinction between the enclosure of the appeal site and the enclosure of the wider area of its river corridor setting.
- 5.36 The LVA does not assess private views and private visual amenity which, if required would be carried out using a Residential Visual Amenity Assessment. For most applications this is not a normal requirement. Effects on resident receptors are dealt with in the LVA and in this POE by considering the views they are likely to experience in public spaces, roads and paths in their locality and factoring in the high degree of susceptibility of residents with properties close to the site.
- 5.37 The site is locally open to views from within much of the defined LC1 area to the south and south east and from the adjacent A22, Boship roundabout and the A271, but beyond this relatively localised area of intervisibility, the site benefits from the good degree of visual enclosure enjoyed by the wider LC1 area. Views from the wider surrounding landscape to the west of the A22 are effectively screened or filtered by vegetation along the A22 corridor.
- 5.38 The combined effects of vegetation and existing development on the north side of the section of the A271 north of the site, effectively screens the site from the landscape north and west of Lower Horsebridge. The vegetation and development on the southern edge of Lower Horsebridge provides a strong

enclosure screening the site from all but the southern edge properties and also restricts views of the site from the wider area.

- 5.39 The developments on the north west edge of Hailsham including Welbury Meadows and Solent Crescent combined with vegetation and rising topography provide a strong visual screen to the south and east.
- 5.40 However, within the area providing clear views of the appeal site area broadly equating to the outer extent of LC1, there are a range of views.
- 5.41 From the immediate area north and west of the site, there are some clear localised views into the site from the adjacent A271, A22 and Boship roundabout (LVA viewpoint 4) and from six residential properties facing the site (including listed property Brook House) on the north side of the A271. There are also views from the Boship Lions Hotel area, filtered by vegetation.
- 5.42 Houses on the southern boundary of Lower Horsebridge have varied views of the site with some properties orientated towards the site and others with oblique views. The village of Lower Horsebridge has developed historically along the route of the A271 facing inwards to the street with its back to the river corridor and it is only in the 20th century that some housing has been built facing over the corridor.
- 5.43 Footpath Hellingly 12/1 passes to the north and east of the site south of Lower Horsebridge and allows clear and varying views of the site along most of its route between the western and eastern ends of the A271 loop. Views include the areas of existing development to the south as well as close views of the edge of the village.
- 5.44 At the western end of the path (LVA viewpoint 3), the appeal site is close and visible, extending to the Boship roundabout, but the visual amenity on this section of path is adversely affected by the sight and noise of traffic on the adjacent highways.
- 5.45 Development and vegetation on the northern edge of Hailsham, south of the river, coupled with rising topography contains views of the site from the wider landscape beyond to the south and east. There are views from the edges of

development overlooking the river corridor area, filtered by intervening vegetation and more open views from the public open space north of that development.

- 5.46 Other views from the immediate area include filtered views from some parts of the Lower Horsebridge recreation ground and a short section of the A271 at the eastern end of the appeal site.
- 5.47 To investigate wider visibility, desktop visibility studies included generating original ZTVs for a residential development of a mix of 2-2.5 and 2.5-3 storeys (ZTV zones up to a maximum of 9.5m and 12.5m). The ZTVs were based on 'bare earth' where no account is taken of the vegetation, and 'normal' conditions where vegetation is accounted for. These ZTVs are based on free height data, appropriate for outline studies as they provide a 'worst case' scenario. The ZTVs were then tested in fieldwork and augmented with visits to accessible areas indicated as having potential visibility of the proposals. The ZTV (version including vegetation as this is most representative) is included in Figure 9 of the LVA(CD1.14). The ZTVs were prepared prior to the decision to restrict the lower height parameter zone to 2 storey, but the 11m height allowed for was retained for the ZTV to allow variation in finished ground level. This is also the case for the 2.5 - 3 storey buildings at 12m maximum. The ZTV for those is set at 12.5m.
- 5.48 Table 5 identifies the potential visual receptors of the proposals. A number of representative viewpoints were selected within the study area to illustrate how the site might be experienced by the identified visual receptors. The viewpoints chosen provide a representative selection of views from locations covering a range of receptors from varying directions and distances. The viewpoint locations are illustrated on Figure 10 of the LVA and the photographic viewpoints are illustrated on Figures 11 to 20 of the LVA.
- 5.49 For the submitted LVA, sensitivity was stated for the visual receptors, combining susceptibility and value attached to the view. Value of the view does not relate to the value the individual receptor may place on it, it is a judgement that the assessor makes on the relative value of the view. The receptor's susceptibility to change in the view is then factored in at the assessment stage.

In this review, the value of the view is recorded separately in Table 5. The GLVIA provides very little guidance on the value attached to views at the lower end of the importance scale. tor&co's landscape and visual assessment sheets provide guidance (Appendix j) and have been used in this assessment. In this instance it is considered that for everyday views experienced by receptors who are local residents and users of local roads and PRowWs, although the landscape is not designated or of great scenic value or even enjoyed as part of a recreation activity, the value of the view is assessed as medium due to the likelihood that views which those receptors will know and enjoy would be valued more. This contrasts with the views experienced from the A22 and A271, where the quality of the views are reduced due to the highway related detractors and activity/focus of the receptor and so the view value in these instances is assessed as low.

Table 5 Visual receptors		
Visual receptor	Location	Identified viewpoint(s)
Residents accessing local streets/PRowWs/ public areas	Residents of properties serviced from A271 adjacent/close to northern boundary at western end of site Potential views from the Lower Horsebridge properties likely to be extremely varied. Detailed analysis of individual property views is not within the scope of this report but there would be some views of the proposals which would vary with the amount of intervening vegetation and development. The degree of visibility will be judged within the constraints of access to the site and from publicly accessible routes. Residents of these properties using the local path and road network would experience clear views of the proposals primarily from the PRow crossing the site and using the A271. View value: medium	Views from PRow footpath 12 (Viewpoints 1, 2 & 3) and travelling the A271 and A22 (Viewpoint 4)
	Residents of properties north west of the site, on the section of A271 between Lower Horsebridge and the Boship roundabout Properties adjacent to this section of the A271 would have clear views of the proposals. Detailed analysis of individual property views is not within the scope of this report. Residents of these properties using the local path and road network would experience clear views of the proposals primarily	Views from PRow footpath 12 (Viewpoints 1, 2 & 3) and travelling the A271 and A22 (Viewpoint 4)

	from the PROW crossing the site and using the A271. View value: medium	
	Residents of properties at Welbury Meadows, Solent Crescent and Cuckmere Close, Hailsham Potential views from a number of properties. . Residents of these properties using the public open space at Welbury Meadows, other local paths and the road network would experience clear views of the proposals. View value: medium	Views from Welbury Meadows public open space, (Viewpoint 6) and travelling the A271 and A22 (Viewpoints 1, 2, 3 and 4)
Users of transport routes	A22 and Boship roundabout The section of A22 adjacent or close to the site includes a dual carriageway with mature planting alongside both carriageways to the north east, the Boship roundabout and a section of single carriageway to the north. For most of the dual carriageway section, the site is obscured by roadside vegetation but there are some significant gaps in the vegetation where clearer views are glimpsed in passing. The site is visible from the Boship roundabout, but for the remaining section of A22 westwards, the site is obscured by roadside development and vegetation. View value: low	Views from restricted sections of A22 dual carriageway and Boship roundabout (Viewpoint 4)
	A271 Two sections of A271 pass adjacent to the site. The proposals would be theoretically visible from the section of A271 adjacent to the eastern end of the site but it is unlikely that it would be readily perceived. There would be clear views of the proposals from section of A271 adjacent to the western end of the site. View value: low	Views from A271adj. east end of (Viewpoint 1) and from A271adj. west end of (Viewpoints 3 & 4)
Users of recreational routes	Public right of way (footpath Hellingly 12/1) passing north of the site Footpath 12/1 passes just to the north of the site. Views of the proposals would be clearest from the westernmost sections of the PROW, reducing eastwards. View value: medium	Views from footpath 12/1 (Viewpoints 1, 2 and 3)
	Public right of way to the north east of the site (Hellingly 61/3) The ZTV suggests potential views from a section of bridleway between Grove Hill and Shawpits Farm approximately 2.2km to the north east of the site. View value: medium	View from a very restricted section of public footpath (Viewpoint 10)
	Public rights of way to the west of the site Hellingly 14/1 and 15/1. Views of site mostly obscured by intervening wooded area and service station/hotel; at Boship Roundabout. View value: medium	View from restricted section of public footpath (Viewpoint 5)

	Public rights of way to the south of the site (Arlington 3/1) Footpath section between Hailsham and Michelham Priory. Some limited sections of path have views towards the site with the A22 roadside site boundary vegetation and light columns at Boship roundabout perceptible. View value: medium	Views from restricted sections of public footpath (Viewpoints 7, 8 and 9)
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5.50 The potential effects of the development on these identified landscape and visual receptors are assessed in Section 7.

6.0 Project description

Development proposals

- 6.1 The proposals are for an up to 124 dwelling residential development in the westernmost part of the appeal site, with associated infrastructure including a new vehicle access from the A271 and use of the remaining area of the site for biodiversity-led public open space and sustainable drainage.
- 6.2 The proposals are illustrated in the modified parameter plan 231703-TOR-XX-ZZ-DR-A-P011-revC (CD8.2) which indicates the development zone, maximum building heights (Areas of up to 12m and 9.5m) and the access arrangement and location. The highway access plan 332110699_5501_SK009_P02 provides detail relating to the new junction and road widening. Possible landscape design is shown on the illustrative masterplan 231703-TOR-XX-ZZ-DR-A-P010-revC (CD8.1) and the illustrative landscape strategy plan (Figure 14).

Predicted sources of landscape and visual effects

- 6.3 For the purposes of assessing the landscape and visual effects the main elements of the proposals that would result in potential landscape and visual effects and the mitigation measures that have been taken account of in the assessment, are set out in the following paragraphs.

Predicted temporary effects during construction

- 6.4 The following activities will cause temporary changes to landscape and visual receptors during all phases of the construction period:
- Infrastructure provision – building access roads / connection to services / trenching operations
 - The erection of temporary protective and security fencing as well as hoarding to reduce noise impact
 - Site compounds and contractors' car parking
 - Site excavation and the movement of site soils for the construction of the new vehicular access
 - Site level minor changes, mainly involving foundations, creation of new road infrastructure and the creation of a development platform

- Introduction of cranes, rigs and large machinery and their associated movement and noise, both to and from the site and around the site
- Temporary lighting and signage associated with construction works
- Changes to the surrounding roads due to the movement of additional heavy machinery during construction
- Construction related noise affecting local levels.

Predicted permanent effects at completion (post-construction)

6.5 The following activities will cause permanent changes to landscape and visual receptors:

- new area of residential development, part up to a maximum of 12m height and part up to a maximum of 9.5m height (refer to parameter plans)
- Introduction of new junction on A271 and access into site including removal of 209.5 linear metre section of existing hedgerow.
- New open space for residential development with native planting, areas of grassland, attenuation basins and swales and wildlife ponds.
- Earthworks/contouring including floodwater attenuation basins and where required, A22/A271 noise attenuation features.

Primary mitigation measures

6.6 It has been assumed as part of the assessment that a number of primary and secondary mitigation measures will be incorporated as set out below:

- Consideration of scale and form of built development to minimise impacts on the wider landscape and views
- Consideration of set-back distances and relationship of buildings on A271 frontage to minimise impacts on properties on north west side of A271, including Grade II listed building Brook House and retain views into the open landscape north of the proposed development
- Retain and enhance/rejuvenate the area of mature woodland within the site
- Retain where possible and enhance, boundary vegetation
- New strategic planting to include strong landscape and visual mitigation role to help screen and/or absorb effects of development in terms of identified sensitive landscape and visual receptors
- tree planting within developed area to help absorb massing of development and create a greener environment
- New planting to include new hedgerows and new areas of scrub and woodland to have biodiversity/wildlife corridor role, linking surrounding habitats with the river corridor and enhancing or providing new habitats site-wide.

- New planting to include new hedgerows and new areas of scrub and woodland to have biodiversity/wildlife corridor role, linking surrounding habitats with the river corridor and enhancing or providing new habitats site-wide
- New landscape corridor along the A271 boundary including new species rich hedgerow and woodland belt to replace existing hedge removed to enable visibility splays
- Enhancements to the Lower Horsebridge Stream corridor including new areas of streamside planting to enhance its biodiversity value
- Ensuring that the site landscape makes a positive contribution to the wider Cuckmere River corridor, to maintain the river corridor character and enhance biodiversity with a range of appropriate habitats and spaces replacing the current agricultural land use
- Provision of new green infrastructure to provide important amenity space and play space incorporating opportunities for ecological enhancement
- Enhancement of the surface water attenuation features to provide areas of damper grassland habitat and planting
- Creation of two wildlife ponds

Secondary mitigation measures

- Development design to respond to the local Low Wealden character and also selected in terms of wider visibility (for instance avoidance of white/light render for elevations that may be more visible).
- Planting species to reflect locally prevalent species and respond to the site's landscape context and to integrate the development into the wider landscape and to respond to local character.
- Noise attenuation measures along the A22 and new junction.

Design response to site context

- 6.7 The proposals are located in an area that addresses the open landscape area, Lower Horsebridge, the A22, Boship roundabout and the A271. All of these contextual elements require different responses and this is outlined in the following paragraphs.
- 6.8 Where the proposals will address both the open landscape area and Lower Horsebridge, the design would emulate the development forms at Welbury Meadows and Solent Crescent where the developed area, like the appeal site proposals, extends up to the edge of flood zone 2, then transitions with substantial areas of landscape, softening the appearance of built form into the more open pastoral landscape.

- 6.9 In this landscape-facing area, the lower heights of the 2 storey buildings (up to 9.5m height) on the eastern part of the development will soften the transition from the higher density and taller buildings (up to 12m) on the west side and the large area of naturalistic landscape wrapping around the parts of the site facing the wider landscape will create an attractive and appropriate setting for the development and also the setting for the remaining area of LC1.
- 6.10 The similarity of the proposals to existing development reduces the susceptibility of the existing landscape of LC1 to the change that would arise from the development.
- 6.11 The same approach in terms of best use of the land and transitioning to the river corridor is demonstrated in the approved proposals for the land east of north street (WD-2019-1575-MAO) (CD11.6) which at up to 130 houses is of a very similar scale.
- 6.12 The proposals will also face on to the Boship roundabout, the A271 and the A22. This section of development is connected to and will be perceived as, part of the developed area at Boship and Lower Dicker. The character of the development in this area is very varied and does not have a distinctive appearance and this very varied character extends along the A22 as it passes through Lower Dicker.
- 6.13 At outline stage the precise form of the development and its articulation is not developed. However, the variety of development forms at Boship and Lower Dicker presents an opportunity for design approaches that will provide a distinctive high quality and innovative development on the western edges of Hailsham.
- 6.14 Alternatively a more conservative approach might be a similar design approach to the 3 storey buildings at the A22 / Hempstead Lane junction and other three storey buildings on the development edge at Hedley Way.
- 6.15 2.5-3 storey buildings would be an appropriate and proportionate response to the scale of the roundabout and major highway environment and would also provide the necessary acoustic screening.

- 6.16 There is also potential for a layout that has more higher density buildings located in the 2.5-3m parameter zone than the illustrative layout, which would be possible to design changing the character of the external appearance of the development without a change to the effects on landscape and visual receptors, as they would be compatible with the assessed parameter plans.
- 6.17 The assessment of the effects on landscape and visual receptors has been carried out based on maximum heights for the two height parameter areas rather than a fixed layout, which leaves great flexibility for a range of options to achieve higher densities to be explored.
- 6.18 The development will be set back from the A22 south-bound carriageway by approximately 30m which would allow for woodland planting (similar to that established between the A22 and the service station at Boship). This planting and set-back would provide a more attractive outlook for residents of the development and also soften the appearance of the development in views from the highway and adjacent property.
- 6.19 The section of the development that fronts the A271 has been designed to address and mitigate the inevitable visual effects on properties on the opposite side of the road. Here, the five detached properties on the western end of the A271 close to Boship roundabout, are set back by approximately 18m. The proposals will also be set back at approximately 18m from the existing road edge and the total separation between the new and proposed properties will be approximately 50m. This zone will allow a new hedgerow and tree belt to be established that would provide additional privacy and visual separation and softening of the appearance of the development.
- 6.20 The proposals address potential visual impact on Brook House and the changes to the parameters plan reduces that harm, by restricting buildings 30m back from a line perpendicular with the main elevation of the house. This provides for a swathe of landscape directly aligned with the house and allows views into the wider open space.
- 6.21 The Hellingly Neighbourhood Plan 4 (Appendix i) defines views and vistas from the area of Brook House. The direction of the view corridor and vistas is directed eastwards away from the developed area and no development would

intervene in those view corridors. The growth of planting adjacent to the access road would, in views from the important view point identified in the Hellingly NP help direct the focus of the view eastwards and screen the development.

- 6.22 The reduction in developable area replaced with landscape area will provide a wider swathe of landscape extending towards the wider open landscape. The other effect of this change is, that it provides a 116m width gap between the developable area and the edge of development at Lower Horsebridge, greater than the existing gap between Lower Horsebridge and Brook House which is 91m and very similar to the 128.5m gap that exists between Lower Horsebridge and the edge of Upper Horsebridge/Hailsham, retaining a consistent separation between the developed areas.
- 6.23 The landscape and biodiversity measures proposed as part of the proposals, when taken as a whole, are appropriate and consistent with the landscape strategies adopted in other recent developments close to the Cuckmere River corridor such as Welbury Meadows and Solent Crescent, that have proven to provide a significant softening and semi-natural character to the developments framing the corridor. All spaces have been designed to be 'naturalistic' in character, reflecting this urban fringe location and respecting the established character of the wider landscape defined by LC1 and enhancing the setting of the stream corridor which currently feels exposed and lacks presence in the landscape
- 6.24 The developable area is located on the periphery of LC1 where it does not form an integral part of the LC1 area and so would leave the majority remaining area a cohesive and robust swathe of landscape performing the same role of enclosing the LC1 landscape setting as the surrounding developments.
- 6.25 In some respects the appeal site developable area, in the 'Boship corner' is currently at variance with the wider area, as it is by far the most exposed to the adverse influences of traffic and noise which audibly and visually have quite a marked effect on the enjoyment and sense of tranquillity of the PRoW at the western end of it. As indicated in Plan 4 of the Hellingly NP (Appendix i), views are directed chiefly towards the more attractive open landscape rather than

towards the roundabout reflecting the lack of visual amenity offered by this part of the site.

- 6.26 The vision is for development of the Boship corner and the new landscape setting for it to create a sense of enclosure for LC1 that would be characteristic of the enclosure provided by the other developments and by Lower Horsebridge. The plan on Figure 4 illustrates the peripheral nature of the developable area to the river corridor and also shows its similar relationship to the edge of the river corridor as existing and approved developments.
- 6.27 The only aspect in which the Boship corner has a demonstrable connection to the wider LC1 landscape is that it is in the foreground of the views from Boship roundabout and the A271. However, the context of the views, from a busy highway, severely reduces its value, quality and enjoyment and new views from the more attractive areas of open space in the development will be enjoyed from a more attractive and tranquil context.
- 6.28 Section 7 describes the impacts of the proposals on the landscape and visual receptors identified in Section 5.

7.0 Predicted landscape and visual impacts

7.1 The Landscape and Visual Appraisal (LVA) (CD1.14) should be referred to in reading this section. The LVA assessed the sensitivity of landscape and visual receptors and assessed the magnitude of change in the landscape resource or experienced by the visual receptor. This assessment reviews the landscape assessment based on the new identified character areas. The visual receptors remain the same as described in the LVA and are summarised in this section.

7.2 The POE assesses degree of significance for both the landscape receptors and the visual receptors for the purposes of the inquiry.

Impact on landscape character

7.3 As set out in Section 3, the proposals affect three distinct character areas. These are assessed along with the effects on the landscape resources and character of the site. The value of each receptor is assessed in tables 2, 3 and 4 in Section 5 using the stated TGN methodology. The tor&co assessment guidance tables (Appendix j) are used to assess firstly the susceptibility of the landscape receptors, which when combined with the value assessment gives the overall sensitivity assessment. This is then combined with the magnitude of change, allowing a judgement on the significance of the effect.

7.4 The landscape receptors are:

- The appeal site.
- LC1 - Area of open land in an urban fringe setting that is bounded by the A22, the A271, development south of the river and Lower Horsebridge north of the river. The appeal site is part of this area but is excluded from the assessment of effects to avoid double counting as it is assessed separately.
- LC2 - Hailsham West assessment unit. (except for overlapping LC1 area to avoid double counting).

- LC3 - Landscape Character area 3A Uckfield to Hailsham Wooded Clay Vale (area of 3A that lies outside of the area defined as Hailsham West assessment unit in the Landscape Sensitivity report).

Impact on landscape character of Site

- 7.5 The appeal site part of LC1 is assessed in Section 5 table 2 to be of **low-medium value** mostly due to its proximity to detracting influences.
- 7.6 Using the susceptibility criteria in the assessment guidance the susceptibility of the appeal site to this form of development is assessed as **medium susceptibility** as there is already a strong influence of development and urbanising influences in the immediate area and the impacts on the physical features would be the removal of approximately 40% of the area of improved grassland and 209.5 linear metres of clipped hedgerow. The overall is therefore assessed as **medium sensitivity**
- 7.7 In considering magnitude of change, the built area would have a direct effect on a large proportion of the site and would considerably increase the influence of development on the remaining part of the site. However it would be consistent with the developed nature of the Boship roundabout area. All other site features, including the woodland, ponds and remaining boundary vegetation would be retained and enhanced. The extensive landscape measures would provide a very good degree of screening and softening of the development in the undeveloped parts of the site. The new landscape will also provide an appropriately natural edge to the stream corridor in this location, where currently there is quite a harsh edge provided by the A22, A271 and Boship roundabout.
- 7.8 Taking account of these considerations, and due to the weighting given to the change from field area to built area for approximately 40% of the site; on balance the magnitude of effect is judged to be initially **large adverse** at Year 1 and construction, reducing to **medium adverse** after 15 years by which time the very large amounts of planting will have greatly softened the appearance of the development in views from the remaining area of LC1 and it will start to assimilate with more established existing developments enclosing LC1.

7.9 Considering the **medium** sensitivity and **large** adverse effect the significance of effect on the site at Construction and Year 1 is **substantial** adverse. At Year 15, with a predicted medium adverse change, the significance of effect would reduce to **moderate** adverse.

7.10 This level of effect is inevitable with the change of part of the appeal site from field area to built form. However, the change will create a more cohesive and enclosed character to that part of LC1, assimilating with the character of LC1 of urban fringe built form in a setting of naturalistic planting enclosing a central open landscape centred on the river corridor. The change will also reduce the adverse influences of traffic on this area of LC1.

Impact on landscape character of LC1

7.11 tor&co's character area LC1 is assessed in Section 5 table 2 to be of overall **medium** value not including the site area assessed above.

7.12 In view of the similarity of the landscape setting for the proposed development as the landscape setting of developments such as Welbury Meadows, where large areas of naturalistic landscape have the effect of softening the urban appearance of the development, the susceptibility of LC1 to this form of development is assessed as **low-medium**, as in my judgement the developed area would appear (after planting has established) in character with the existing developments. With a **medium value** and **low-medium susceptibility**, LC1 is assessed as **medium** sensitivity.

7.13 The visual appearance of the proposals will affect a large proportion of the remaining character area but its similarity to other peripheral developments, mean that once planting has established it will assimilate well with them. It will not interrupt the east-west flow of the pasture area from one end of LC1 to the other and it would reduce traffic noise levels and the sight of traffic from parts of LC1. The majority of LC1 will remain an open landscape, but with less visible pasture balanced against an increase in biodiversity planting which would arguably be beneficial. On balance, the magnitude of effect is judged to be initially **moderate adverse** at Year 1 and construction, reducing to **small-medium adverse** after 15 years by which time the very large amounts of planting will have greatly softened the appearance of the development in views

from the remaining area of LC1 and it will start to assimilate with more established developments enclosing LC1.

- 7.14 Considering the **medium** sensitivity and **medium** adverse effect the significance of effect on LC1 at Construction and Year 1 is **moderate** adverse. At Year 15, with a magnitude of change of small-medium adverse, the significance of effect would be **slight to moderate** adverse.
- 7.15 This change will create a more cohesive and enclosed character to the western part of LC1, assimilating with the character of urban fringe built form in a setting of naturalistic planting enclosing a central open landscape and centred on the river corridor. The change will also reduce the adverse influences of traffic on this area of LC1.

Impact on landscape character of LC2

- 7.16 tor&co's character area LC2, is based on the Hailsham West Assessment Unit but subtracting the distinctive enclosed area of LC1 to form a separate character area. LC2 is assessed as to be of **medium** value in Section 5, table 3.
- 7.17 In view of the likelihood of development in relation to the West Hailsham growth area illustrated in Figure 4, the susceptibility to development on the site is considered to be **low** as the area of LC2 in the vicinity of the site is already a partially developed area and the planned future development will strengthen that context. With **medium** value and **low** susceptibility, the sensitivity is assessed as **medium/low**.
- 7.18 The proposals would impact on the character of the immediate area of the Boship roundabout and there would be some visibility from the Knights Farm West SHELAA site partly screened by the service station. Areas of potential visibility are indicated on ZTV suggest a localised effect on a very small proportion of LC2. With a development form similar to others on the edge of Hailsham and not unexpected in a growth area, the magnitude of effect is assessed as **small** adverse for construction, Year 1 and Year 15.

- 7.19 Taking into account the **medium/low** sensitivity and **small** adverse effect the significance of effect on LC2 at Construction, year 1 and Year 15 is **slight** adverse.

Impact on landscape character of LC3

- 7.20 tor&co's character area LC3 - is the area of WDC Landscape Character area 3A Uckfield to Hailsham Wooded Clay Vale that lies outside of the area defined as Hailsham West assessment unit in the Landscape Sensitivity report. LC3 is assessed as to be of **medium/high** value in Section 5, table 4.
- 7.21 In view of the predominantly rural character of LC3, lying outside WDC's assessment area Hailsham West, the susceptibility to development of the site is considered to be **low**. With **medium/high** value and **low** susceptibility, the sensitivity is assessed as **medium-low**.
- 7.22 Areas of potential visibility indicated on ZTV suggested small areas of visibility to the south west of the site from land in the Cuckmere valley beyond the A22 but it was concluded that the development would be at worst, just perceptible and in most cases not visible. Affecting a very small proportion of LC2 and with any possible visible development being not readily perceived, the magnitude of effect is assessed as **small/negligible** adverse at Construction, Year 1 and Year 15.
- 7.23 Considering the **medium/low** sensitivity and **small/negligible** adverse effect, the significance of effect on LC3 at construction, Year 1 and Year 15 is **slight** adverse.

Summary of landscape effects

- 7.24 The landscape effects are:
- The site - **Significant** (**substantial** at Construction and Year 1, reducing to **moderate** at 15 years).
 - Character Area LC1 - **Significant** landscape effects (**moderate** at Construction and Year 1, reducing to **slight to moderate** at 15 years).

- Character area LC2 - Slight, not significant.
- Character area LC3 - Slight, not significant.

Visual impacts

7.25 Visual receptors are people who would experience views of the proposals. The LVA sets out a detailed description of the visual receptors potentially affected by the proposals. Section 5 summarises these, ascribes value to the views and describes the limited extent of visibility of the proposals that results in a restricted number of visual receptor groups.

7.26 Table 6 below sets out the visual effects on the visual receptors identified in Section 5 and detailed in the LVA.

Table 6: Visual impact assessment (assessment summarised from LVA (but with added significance of effect results))

Visual receptor	Sensitivity (Value & Susceptibility)	Magnitude of change	Significance of effect (adverse)
Residents of properties serviced from A271 (Lower Horsebridge) adjacent/close to northern boundary at western end of site. and Brook House* see summary	medium value view high susceptibility receptor High sensitivity	Large adverse Construction and Yr 1 Medium-large adverse Yr 15	Substantial Construction and Yr 1 Moderate/substantial Yr 15 Significant
Residents of properties north west of the site, on the section of A271 between Lower Horsebridge and the Boship roundabout *excluding Brook House see summary	medium value view high susceptibility receptor High sensitivity	Large adverse Construction and Yr 1 Large adverse Yr 15	Very substantial Construction and Yr 1 Very substantial Yr 15 Significant
Residents of properties at	medium value view	medium-large adverse Yr 1 and construction	Moderate/substantial Construction and Yr 1

Welbury Meadows, Solent Crescent and Cuckmere Close, Hailsham	high susceptibility receptor High sensitivity	Medium adverse Yr 15	Moderate Yr 15 Significant
Travellers: A22 and Boship roundabout	low value view low susceptibility Low sensitivity	Negligible-small adverse Construction, Yr 1 and Yr 15	Slight Construction and Yr 1 Slight Yr 15 Not significant
Travellers: A271	low value view medium susceptibility Medium sensitivity	Small adverse Construction, Yr 1 and Yr 15	Slight Construction and Yr 1 Slight Yr 15 Not significant
PRoW users Hellingly 12/1) passing north of the site	medium value view medium susceptibility Medium sensitivity	Medium adverse Construction and Yr 1 Slight adverse Yr 15	Moderate Construction and Yr 1 Moderate Yr 15 Significant
PRoW users to the north east of the site (Hellingly 61/3) and PRoW 28/1	medium value view medium susceptibility Medium sensitivity	Small to negligible adverse Construction and Yr 1 Negligible adverse Yr 15	Slight Construction and Yr 1 Slight Yr 15 Not significant
PRoW users Public rights of way to the west of the site Hellingly 14/1 and 15/1.	medium value view medium susceptibility	Small to negligible adverse Construction and Yr 1 Negligible adverse Yr 15	Slight Construction and Yr 1 Slight Yr 15 Not significant
PRoW users to the south of the site (Arlington 3/1)	high value view high susceptibility receptor	negligible adverse Construction and Yr 1 Negligible - none adverse Yr 15	Slight Construction and Yr 1 Slight Yr 15 Not significant

Summary of significant visual effects

7.27 Residents on the section of the A271 alongside the northern boundary of the site would experience the greatest changes in views as a result of development obstructing views or intruding to a large degree into views. The significance of effect for this receptor group is very substantial adverse for Construction, Year 1 and Year 15.

7.28 The only change in the assessment compared to the LVA arises from the removal of development from (originally) nearly opposite Brook House, to 30m

westwards, allowing the retention of a view or vista to the open landscape south east of Brook House in accordance with Hellingly NP Map 4 views and vistas. The significance of effect for this receptor is substantial for Construction and Year 1 reducing to moderate to substantial at 15 years as planting matures.

- 7.29 Residents with properties accessed from the A271 on the southern edge of Lower Horsebridge, opposite the appeal site, would experience a large change in views to the south west, but the vector of view to the south east would remain as existing. The significance of effect for this receptor is substantial for Construction and Year 1 reducing to moderate to substantial at 15 years as planting matures.
- 7.30 Residents of the developments on the north west edge of Hailsham would experience a large change in views to the north west in using the public open space along the river corridor, The significance of effect for this receptor is moderate to substantial for Construction and Year 1 reducing to moderate at 15 years as planting matures.
- 7.31 Users of PRoW Hellingly 12/1 along the southern edge of Lower Horsebridge would experience a medium change in views experienced in using the public open space along the river corridor. Most of the views would remain unchanged and uninterrupted but views towards the site would be adversely affected. The significance of effect for this receptor is moderate for year 1 reducing to slight at 15 years as planting matures.

Visualisations

- 7.32 The LVA included representative viewpoints which were annotated and classed as Type 1 visualisations, which are annotated photographs. Type 4 visualisations suitable for an inquiry were requested by the landscape witness for WDC 29.02.24 (see Appendix I). tor&co considered the request and prepared visualisations showing baseline conditions, Year 1 and Year 15 for LVA viewpoints 2 and 4 and Viewpoints A and B requested by WDC's landscape witness. A fifth requested visualisation from viewpoint 6 was not prepared due to time constraints and the fact that it was very similar to the requested view B. The methodology for the visualisations is at Appendix k.

7.33 Figure 15 shows the viewpoint locations.

7.34 The visualisations show the development as a massing with some external detail which is intended to give a realistic impression of the development based on just one layout option. The landscape is based on the landscape strategy shown on Figure 14 which was prepared to inform the biodiversity net gain calculations. The layout of planting is indicative but likely to be representative of the final landscape strategy. The landscape shown at Year 1 in each case is extremely conservatively portrayed to avoid giving a misleading appearance, but use of semi-mature planting to provide initial screening and softening would be a likely secondary mitigation measure. The following paragraphs describe the visualisations.

View 2 visualisations baseline, year 1 and year 15 are on Figures 16 a, b and c all in 2 parts, south and north.

7.35 View 2 is shown in two parts to encompass the wide panorama south towards development on the edge of Hailsham and west towards the A271 that is experienced from this location on the Hellingly 12/1 PRow immediately south of the recreation ground at Lower Horsebridge. To the south, development at Welbury Meadows, one of the developments on the south side of the Cuckmere River is clearly visible but as it is softened by vegetation it is not prominent. The course of the river is marked out with trees and the public open space grassland on the south bank is visible. The Lower Horsebridge Stream is visible in the foreground and beyond that the site and the small woodland. Seasonal ponds are visible. To the left of the woodland, the site is open extending south west to the A22 and the Boship roundabout and north to the A271.

7.36 View 2 Year 1 shows the view southwards largely unaffected, but the view north is altered with the proposals looking initially prominent occupying the upper part of the site field and the roadside hedgerow largely removed to allow the access and highway improvements. The view to Brook House is open.

7.37 View 2 Year 15 again shows the view southwards largely unaffected, but the view north is significantly softened by the landscape and the development and planting appears to frame the stream valley. The impression is similar to the appearance of Welbury Meadows, partially screened by planting and it is

anticipated that the planting which will include species such as willow, alder and poplar will grow significantly faster than the conservative growth rates set out in the methodology.

View 4 visualisations baseline, year 1 and year 15 are on Figures 17 a, b and c.

- 7.38 The view from this location at Boship roundabout looking east is pleasant with the pasture of LC1 extending to the east. The site field is immediately ahead enclosed by a low hedgerow and the site woodland is seen beyond it. Cuckmere Close and Welbury Meadows are visible beyond the river and Solent Crescent is screened by the site woodland. The line of poplars marking the boundary of the recreation ground at Lower Horsebridge are visible behind the foreground vegetation. The context of this view is, with no footway or formal crossing, rather unsettling to the receptor due to the close proximity, noise and sight and frequency of traffic on the roundabout. I suggest that the vast majority of people experiencing that view would be on a vehicle journey and it would be a very fleeting experience. If experiencing it as a pedestrian, my experience of that junction is that the senses are dominated by the traffic noise and movement and in that respect, the view becomes a secondary consideration, to enjoy from the slightly less busy A271 opposite Brook House where a similar view is available.
- 7.39 View 4 Year 1 shows the development facing the roundabout. The building is shown with the main ridge at 10.8 m height. The yellow dashed line represents the maximum 12m parameter plan height above the ridge. The building form is illustrative, but is not dissimilar in form and scale to the three storey corner building at BN27 3AE , the next A22 junction south, approximately 900m south at Hempstead Lane, just east of the A22. The building removes the original view and changes the character of this direction of view from the roundabout, but in the context of the journey on the A22, through Lower Dicker, it would not be uncharacteristic of the Lower Dicker/Boship roundabout cluster of development and in an area destined for development growth. The view looking in the opposite direction is shown on Figure 11.

- 7.40 Although the current view would no longer be available from the roundabout, safer, more tranquil and more attractive views of the open pasture could be gained from the proposed network of paths and open space of the proposals. The existing hedge in this area would be retained.
- 7.41 View 4 Year 15 shows the growth of planting in the woodland belt established in the 18m depth of frontage landscape.

View A visualisations baseline, year 1 and year 15 are on Figures 18 a, b and c.

- 7.42 View A is one requested by the landscape witness for WDC from Hellingly 12/1 PRoW close to the recreation ground at Lower Horsebridge, indicated by a line of poplars. The view does not include the whole panorama to the south but is focused towards the appeal site. The Boship roundabout, services and development along the A271 are visible forming the backdrop to the view Brook House is visible to the north west. The site woodland is central to the view and vegetation along the A22 is visible enclosing the site and LC1 to the west.
- 7.43 View A Year 1 shows the view altered with the proposals looking initially prominent (but not uncharacteristic), occupying the upper part of the site field. The site field partly obscures the proposals reducing their massing. The rising ground in the foreground obscures the hedgerow removed to enable access. The view to Brook House is open.
- 7.44 View A Year 15 again shows the appearance of development is significantly softened by the landscape and the development and planting appears to contain the landscape of LC1. The view towards Boship and the A22 and A271 is removed but their contribution to the character of LC1 was negative. As for view 2, the impression is similar to the appearance of Welbury Meadows, Solent Crescent or Cuckmere Close, partially screened by planting.

View B visualisations baseline, year 1 and year 15 are on Figures 19 a, b and c.

- 7.45 View B is one requested by the landscape witness for WDC from the public open space west of Solent Crescent. The view is focused towards the appeal site. The open space is in the foreground, with trees marking the course of the Cuckmere River. The Boship roundabout, services and development along the A271 are screened from view in this location and the focus is towards Brook House to the north west which encloses the vista and further to the north the rather suburban appearance of Lower Horsebridge.
- 7.46 View B Year 1 shows the view altered with the proposals looking initially prominent (but not uncharacteristic), occupying the upper part of the site field. The view to Brook House is open and the visible extent of pasture of LC1 is largely intact.
- 7.47 View B Year 15 shows the appearance of development is significantly softened by the landscape and the development and planting appears to contain the landscape and pasture of LC1. The effect on the character of LC1 is, in this view, very limited. As for views 2 and A, the appearance of the development, softened by extensive landscape is similar to the appearance of Welbury Meadows, Solent Crescent or Cuckmere Close, partially screened by planting.

8.0 Response to main reason for refusal (ii) the effect of the proposed development on the landscape character and appearance of the site and the surrounding area and the visual impact.

8.1 My evidence now addresses main reason for refusal (ii) the effect of the proposed development on the landscape character and appearance of the site and the surrounding area and the visual impact.

8.2 WDC state that the site is in open countryside and at paragraph 3.1 they describe the site as being in a 'predominantly rural landscape close to the urban edge of Upper Horsebridge and Hailsham...' RfR1 states that the development would appear as a highly urbanised housing estate out of keeping with the rural location...

Rural countryside or urban fringe

8.3 I therefore turn firstly to the matter of whether the site is located in open countryside and whether it is rural. In Section 3 I set out my findings in relation to WDC's report evidence that I believe shows that the site is not rural and is not open countryside.

8.4 Appendix f is the planning officer's report for the Sports Hub. The penultimate line on the third page states '*The development is one which is not unexpected in a rural-urban fringe location*'. I would need WDC to explain how an undeveloped field farther from Hailsham than the appeal site is in rural-urban fringe but a site next to a busy roundabout and cluster of service stations and hotels is in open countryside.

8.5 On page 84 of the Wealden Landscape Character Assessment May 2022 (CD9.1) under the heading 'Forces for Change' there is a series of bullet points of perceived pressures on the Landscape Character Area LCA 3A Uckfield to Hailsham Wooded Clay Vale. One of these is: '*Potential expansion of Uckfield and Hailsham into the LCA, and an increase in light industrial and urban fringe land uses, which would reduce the rural character of the landscape.*'

- 8.6 Section 3 provides several more examples showing the area is not rural and not open countryside, but in addition it is self-evident from a visit to the site that it is not a countryside or rural location. The growth of Hailsham means that the area of Cuckmere River corridor that provides the setting of the site already has an urban fringe character. This is illustrated in the photographs on Figures 9 and 10.
- 8.7 The imminent further growth described in Section 4 and illustrated in Figure 4 means that the landscape setting of the site (and the river corridor) will become increasingly influenced by development.
- 8.8 Section 4 sets out the detail including commentary on the results of a tor&co study(Appendix h) into the landscape and visual effects of developing both the Sports Hub and the major employment site, which would impact greatly on the rural character of the wider landscape and also impact further on the urban fringe character of the site.
- 8.9 WDC did not include a landscape appraisal or LVIA for the Sports Hub yet the lighting assessment (Appendix g) includes advise that a ZTV is needed to assess the impacts of the twelve 15m height floodlights that will be seen from an extensive area of the countryside.
- 8.10 Section 3 sets out the detail of the recommendations in the report prepared for WDC in 2017 and in Appendix 2.6 of the South Wealden Growth Area Landscape and Ecology Assessment Study (9.13) suggests; *If a small scale development were accommodated in the western corner of the site (in the area outside flood zones 2 and 3) (i.e. the appeal site), landscape effects would be more limited.*
- 8.11 Section 5, Table 1 contains an assessment of character area LC1 defining the local area of the appeal site as a measure of the degree to which it exhibits rural characteristics of the LCA 3A Uckfield to Hailsham Wooded Clay Vale. It scores on the low side of low to moderate which is for a landscape that is described by WDC as rural open countryside

Valued landscape

- 8.12 Page 20 of the WDCSOC confirms that they do not consider that the site is a valued landscape in accordance with NPPF (paragraph 180) but that the Cuckmere River corridor is a valued landscape. The argument put forward is that the Cuckmere River corridor is connected to the wider landscape and that development on the appeal site will somehow block that connection.
- 8.13 I will deal first with the valued landscape matter:
- 8.14 Valued landscape is not defined in the NPPF. The concept of 'valued landscapes' has become a point of contention and uncertainty due to the lack of a definition. The technical guidance note (TGN) on 'Assessing landscape value outside national designations' (CD9.5) is a helpful guide, but it stops short of defining the point at which a landscape can be defined as a 'valued landscape'.
- 8.15 The TGN quotes the 'influential' judgement that accepted an approach that identified whether a landscape had sufficient 'demonstrable physical attributes' to take it beyond 'ordinary landscape'. However, the TGN says focussing on 'physical attributes' might exclude perceptual and associative factors which are included in the methodology for valuing landscape.
- 8.16 So currently it seems to be that each case of valued landscape needs to be looked at on its own merits. One thing that does come out of the discussions around landscape value is that landscape can't be an isolated field or feature and that in looking at a parcel of land one needs to identify what landscape it is part of and then value that landscape as a whole.
- 8.17 In the case of the appeal site, it is contiguous with, but peripheral to a part of a wider area of landscape defined by its visual and largely physical enclosure by developed areas of Hailsham, Upper Horsebridge, Lower Horsebridge and the A271, Boship roundabout and associated development and the A22. I have identified this area as a character area LC1 (see Figure 7) in Section 5.
- 8.18 The area I have defined as LC1 is a parcel of landscape, framed by development softened by naturalistic planting and enclosed by strong vegetated road lines and the edge of Lower Horsebridge. Figures 8, 9 and 10 include images of the area. It has a section of the Cuckmere River flowing through it, which physically divides it into two areas north and south of the river, but it is

perceived as a single shallow valley or bowl. This is also clear on the visualisation from View B (figure 19), from the public open space on the south of the river, which shows how integrated it is visually with the area to the north.

- 8.19 Whilst the river and streams are natural features, the landscape is not strongly of one particular character but instead is a mix of typical but attractive biodiversity-led landscape on the edges of the development south of the river and improved grassland pasture on the north side. The river, its course picked out by riverside trees ties the two different sides together and is a strong feature within the landscape. So although it is a mix of different character and perceptual qualities, it does have a geographical unity and perhaps has the character of an urban edge semi-natural open space.
- 8.20 I have used the landscape value TGN to assess its value and this is shown on table 2. I found that on balance it was of medium value and I could not imagine it reaching the relatively high bar of having either 'demonstrable physical attributes' or on the other hand having strong enough 'perceptual and associative factors' to take it 'beyond ordinary landscape'. I therefore do not regard this area as a 'valued landscape'.
- 8.21 The Hellingly Neighbourhood Plan (extracts at Appendix I) already includes a defined area of 'Locally Valued Landscape' and this area, already identified as a valued landscape and having gone through a rigorous selection process would be much more likely to meet the criteria for valued landscape.

River corridor connections with the wider countryside

- 8.22 Dealing with the statement that the appeal site will 'block' the connection with the wider countryside, 'trap' it between two areas of residential development, and in doing so harm its character I refer again to Figure 7. Looking at the location of the site and its developable area the only areas of open countryside are the fields north of the A271 and the fields north of the service station. The stream corridor connecting with the wider countryside is constrained between Brook House and Lower Horsebridge, but the development would not encroach any more into the river corridor than the other developments and this is best illustrated in Figure 4 where the river corridor is shown in relation to development current and future.

- 8.23 If the reference to connecting to the wider countryside is to the continuation of the Cuckmere river under the A22, the proposals would not in any way restrict the current connection via the bridge. The dual carriageway either side of the bridge blocks or constricts the corridor at that point.
- 8.24 In my view there is not even a weak connection between the river corridor and the open countryside of the Knights Farm West site. Note on Figure 4 that the areas of current open countryside may be developed, one being promoted for a major employment site and WDC having resolved to approve the Sports Hub.
- 8.25 I go into greater detail on those two WDC-owned sites in Section 4 of this POE, but they serve alongside the numerous SHELAA sites deemed suitable for development and the two approved residential sites at North Street, Lower Horsebridge, to show the direction that WDC is leading on future growth in the area of North West Hailsham.
- 8.26 Even if there were a connection between the open landscape and the Cuckmere River, it would appear that that connection would end in a large employment site and the A271, A267 and A22 would be hazardous as wildlife corridors. The fact is that the existing tributary stream corridor that extends between Brook House and Lower Horsebridge probably functions as the main biodiversity link between the Cuckmere river and any countryside to the north and the proposals do not encroach into that corridor with the exception of the landscape.
- 8.27 The biodiversity measures that would be part of the development would be of much greater benefit to wildlife than the existing area of improved grassland. Rather than harming the character of the river corridor, this planting would enhance its character in a similar way to which the developments south of the river contribute a richer habitat than grassland. It will result in a more naturalistic character in line with the aspirations of the BOA and give it enclosure and definition.
- 8.28 The appeal site is visually quite exposed to the roundabout (see Figure 11, view 11.2 and the noise and sight of traffic and so development in this peripheral corner site would reduce the adverse influence of the major roads, creating a more tranquil landscape.

Breaching the development edge

- 8.29 WDC state that the proposed development would harm the role that the river corridor has in providing an effective and attractive edge to Hailsham and be the first development to 'breach this barrier' and extend Hailsham into the wider landscape north and west. Referring again to Figure 4, WDC themselves are leading the extension of Hailsham into this area with the approved Sports Hub, a development partner for the Knights Farm major employment site and the numerous SHELAA 'suitable' sites. The area of Boship and Lower Dicker is already an established area of development, and it is set to grow and so the appeal site adjacent to it is not going to appear isolated, but part of the growth area.
- 8.30 Appendix 2.6 of the South Wealden Growth Area Landscape and Ecology Assessment Study report (CD9.13) agrees, stating that *'development in this area (the appeal site) could form a continuation to the existing concentration of development around the A22/A271 roundabout junction.'*

Landscape and visual impacts

- 8.31 Turning to landscape and visual impacts, WDC list the impacts as harm to the character of the local landscape, visibility from the surrounding roads, from the PRoW and from the POS north of the development on the edge of Hailsham, from the Boship roundabout and from the A271. WDC considers that there would be a significant number of people whose visual amenity would be harmed.
- 8.32 The impact on landscape character is set out in Section 7. The assessment found that there would be significant landscape effects on the site mostly due to the physical change from open field to a developed area and on the remaining area of LC1 the visual appearance of the proposals will affect a large proportion of the remaining character area, but its similarity to other peripheral developments, mean that once planting has established it will assimilate well with them. The summary results are:
- The site - **Significant** (**substantial** at Year 1 and construction, reducing to **moderate** at 15 years)

- Character Area LC1 - **Significant** landscape effects (**moderate** at Year 1 and construction, reducing to **slight to moderate** at 15 years)
- Character area LC2 - Slight, not significant
- Character area LC3 - Slight, not significant

8.33 Significant landscape impacts are therefore restricted to the site and the LC1 localised area and limited parts of the Boship roundabout area due to visual enclosure of the site's wider landscape context.

8.34 WDC state that the LVA does not recognise the harm that development would do to the character of the Cuckmere River corridor. In this assessment, the affected part of the corridor, namely the Horsebridge stream part is contained partly in the site and partly in character area LC1. The Cuckmere River corridor is not a separate component, it is an integral part of the landscape character of LC1 and so the effects on the area, including the river corridor contained within it have been assessed.

8.35 Visual impacts are assessed in Section 7. Paragraphs 7.27 to 7.31 summarise the significant effects. I do not disagree with WDC that the visual effects will be experienced by a significant number of people and that some degree of harm may arise. I have identified that some substantial adverse effects will be experienced by people who live in the immediate vicinity of the site. People using the Hellingly PRow 11/2 will also experience significant effects. But these effects are localised and the remaining visual impacts are assessed as slight or negligible and so are not significant. This would be in contrast to the widespread visual impacts on the countryside resulting from WDC's proposals for Knights Farm employment or sports sites.

9.0 Response to main reason for refusal (iii), whether the quantum of development proposed can be satisfactorily accommodated on site.

- 9.1 WDC state: 'At this outline stage the applicant must demonstrate that the quantum of development proposed, accessed from the location detailed, can be adequately accommodated within the constraints of the site' and that they are 'of the view that the site cannot accommodate that level of development within the net developable area of the site'
- 9.2 An application for outline planning permission allows for a decision on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more 'reserved matters'. The reserved matters can include access, appearance, landscaping, layout and scale.
- 9.3 For this application, the access details are provided and height parameters set and so the reserved matters are appearance, landscaping, layout and scale.
- 9.4 The proposal is an outline proposal for up to 124 units. The design recognises the landscape context and seeks to address it positively with appropriate scale and form whilst making best use of the land. The submitted illustrative masterplan illustrates one of many possible options for the design layout purely as an indication of how the development might be arranged on site. The details of how or if that maximum number can be achieved satisfactorily is a matter for a reserved matters application.
- 9.5 WDC make several points about the illustrative masterplan and conjecture on the form of development and ways in which it would fail to comply with the detailed design standards of the Wealden Design Guide. They conclude with. *'Such a scheme is contrary to the aims and objectives of which seeks to ensure that developments add to the overall quality of an area, are sympathetic to local character, built environment and landscape setting and contribute to and enhance the natural and local environment, including by recognising the intrinsic character and beauty of the countryside'.*

- 9.6 My response is that I have set out the outline design strategy in Section 6 paragraphs 6.7 to 6.27 showing how the design might respond to its different contexts, settings and site constraints and including ways that it can contribute to raising the overall quality of the Boship roundabout area which suffers from a lack of identity.
- 9.7 WDC are correct in saying that density is not a good indication of character and design quality and in this instance, the very great depth of landscape enclosing the developed areas would enable a denser development to successfully assimilate with the landscape and appear of a similar character to the established river corridor developments, particularly with the lesser density elements on the outer edges of areas facing into LC1.
- 9.8 Although an outline proposal, I believe that the proposals are an appropriate place-making response to the particular challenges of the site, making use of the higher density against the road-facing boundaries, which in themselves will be set back from the road and creating a quieter and more visually enclosed development that has its focus out over the river corridor.
- 9.9 WDC state that the proposals '*would result in a scheme which is uncharacteristic and discordant with its surroundings both in terms of the open rural countryside landscape and the adjacent low-density development of Lower Horsebridge.*' Scale and appearance are both reserved matters and so it is not possible at this outline stage to characterise the appearance of the development as uncharacteristic and discordant, but notwithstanding this, I disagree on a number of points.
- 9.10 Firstly, I have shown in my analysis of tor&co's character area LC1 in Section 5, which provides the setting for the appeal site, how there is an established character of new residential development in a setting of generous and naturalistic landscape as found for instance at Welbury Meadows and Solent Crescent. The proposals have a generous area of landscape making them to appear very similar in character to those established developments and are therefore neither uncharacteristic nor discordant with its surroundings.
- 9.11 Secondly In relation to Boship roundabout and the development cluster which is a continuation of Lower Dicker, Section 6 describes appropriate design

responses and development in this location should be seen as an opportunity to provide a distinctive high quality and innovative development on the western edges of Hailsham as a gateway to WDC's emerging development zone.

- 9.12 Thirdly, in regard to the question of whether the site is open rural countryside, which it clearly is not, I refer back to paragraphs 8.1 to 8.18 where I responded to the same point under the guise of main reason for refusal (ii)

10.0 Conclusions

- 10.1 Section 3 of my POE sets out the evidence contained in WDC's own assessments and reports that draws one to the conclusion, supported by photographic evidence that the appeal site is not in a rural or countryside location.
- 10.2 Section 3 also shows WDC's South Wealden Growth Area Landscape and Ecology Assessment Study 2017 identified precisely the development area of the appeal site. It states *The western corner of the site adjacent to the A267/A22 roundabout junction is less sensitive and is not in flood zones 2 and 3. and If a small scale development were accommodated in the western corner of the site (in the area outside flood zones 2 and 3) (i.e. the appeal site), landscape effects would be more limited.* I conclude that in their later studies, WDC have ignored or discounted the considered advice provided in that report.
- 10.3 Section 3 also shows that In promoting WDC's own sites they are applying different standards or judgements to the assessment of their sites and ascribing undue sensitivity to the area of the appeal site.
- 10.4 Section 4 of my POE, supported by the mapping of development on Figure 4 and the tor&co report (appendix h) that although the area is already (as confirmed by the planning officer for the Sports Hub (appendix f) 'rural-urban fringe' the development of the Sports Hub and major employment sites will entirely alter the developed context of north west Hailsham and the appeal site.
- 10.5 Section 4 also shows WDC did not include a landscape appraisal or LVIA for the Sports Hub despite advice from their lighting consultant that it will be seen from an extensive area of the countryside and are therefore applying different standards of assessment of landscape and visual effects and different standards relating to accepting landscape or visual harm for their applications.
- 10.6 In Section 5, Table 1 contains an assessment of character area LC1 defining the local area of the appeal site as a measure of the degree to

which it exhibits rural characteristics of the LCA 3A Uckfield to Hailsham Wooded Clay Vale. It scores on the low side of low to moderate which is for a landscape that is described by WDC as rural open countryside. I conclude from this along with the other evidence that the area of the site is not rural and not countryside.

- 10.7 Also in Section 5 as part of my landscape assessment, I have defined an area called LC1, a parcel of landscape which the appeal site is within, framed by development softened by naturalistic planting and enclosed by strong vegetated road lines and the edge of Lower Horsebridge. I conclude that the character of this area is akin to the character of an urban edge semi-natural open space. I also conclude that it is therefore less susceptible (in landscape sensitivity terms) to the form of development proposed which would be similar in nature to existing established developments enclosing the area.
- 10.8 In their SOC, WDC states that the Cuckmere River corridor is a 'valued landscape' although they do not clearly define what that landscape is. The Hellingly Neighbourhood Plan already includes a defined area of 'Locally Valued Landscape' in the same parish and that area, already identified as a valued landscape and having gone through a rigorous selection process would be much more likely to meet the criteria for valued landscape.
- 10.9 I have carried out my own valued landscape assessment based on the published guidance and conclude that the area of landscape that forms the setting for the appeal site was of medium value and I could not imagine it reaching the relatively high bar of having either 'demonstrable physical attributes' or on the other hand having strong enough 'perceptual and associative factors' to take it 'beyond ordinary landscape'. I therefore conclude that the area in question is not a 'valued landscape'.
- 10.10 I conclude that rather than harming the character of the river corridor, the extensive planting associated with the development, would enhance its natural character in a similar way to developments south of the river and will result in a more naturalistic character in line with the aspirations of the BOA and give it enclosure and definition.

- 10.11 Although an outline proposal, I conclude, referring to the several paragraphs in Section 6 that describe the design strategy, that the proposals are an appropriate place-making response to the particular challenges of the site, making use of the higher density against the road-facing boundaries, which in themselves will be set back from the road and screened by planting and creating a quieter enclosed development behind that has its focus out over the river corridor.
- 10.12 The proposals will not appear isolated as WDCSOC describe. The area of Boship and Lower Dicker is already an established area of development. Appendix 2.6 of the South Wealden Growth Area Landscape and Ecology Assessment Study report agrees, stating that *'development in this area (the appeal site) could form a continuation to the existing concentration of development around the A22/A271 roundabout junction.'*
- 10.13 I have assessed landscape impacts. The assessment found there will be inevitable effects on the site of substantial adverse effect due to the change from field to developed area and that there would be effects on the immediate part of character area LC1, but its similarity to other peripheral developments, mean that once planting has established it will assimilate well with them. There would be no significant effects on the wider landscape. Significant landscape impacts are therefore restricted to the site and the localised LC1 area due to the visual enclosure provided by surrounding development and vegetation.
- 10.14 I have assessed visual impacts. Some substantial and adverse effects will be experienced by people who live on the A271 in the immediate vicinity of the site, at Lower Horsebridge and in developments in north Hailsham. People using the Hellingly PRoW 11/2 will also experience significant effects. But these effects are localised and the remaining visual impacts are assessed as slight or negligible and so are not significant.

