

MSDC response to Action Point AP-006

Action Point AP-006

Council to review its extant landscape evidence, provide an assessment and confirm whether it remains up to date, having regard to developments that have been delivered or are planned to come forward under the adopted District Plan/Site Allocations DPD.

In response to the Inspector's action point AP006, the Council has added the landscape evidence to the Examination Evidence Base webpage with the following references:

ENV18	Landscape Character Assessment (2005)
ENV19	Capacity of Mid Sussex District to Accommodate Development (2014)
ENV20	Mid Sussex District SHLAA: Review of Landscape and Visual Aspects of Site Suitability (2015)

The High Weald AONB Management Plan 2024-2029 [ENV5] is already in the Examination Library and provides detailed information on the High Weald's landscape including the core character components that comprise the High Weald's natural beauty.

It is the Council's view that the landscape evidence remains up to date and relevant to the Submitted District Plan.

Overview of the landscape evidence

The purpose of the **2005 Landscape Character Assessment for Mid Sussex [ENV18]** is to 'provide a comprehensive account of the landscape character of Mid Sussex, fostering a greater understanding of its value as an asset for future generations' (page 7). It identifies ten landscape character areas that fall within the three national character areas found in the district: South Downs, Low Weald and High Weald. Natural England has recently published updated information and profiles for the national character areas¹ and these have also been used to inform the evidence for the District Plan, for example, the potential impact of the SHELAA sites on the High Weald AONB [ENV6] and the setting of the South Downs National Park [ENV8].

In a 2023 appeal decision, the Inspector confirmed that collectively the landscape character assessments (the national, county and district character assessments) provided a useful context and these documents were able to confirm that the appeal

¹ <https://nationalcharacterareas.co.uk/>

site was typical of the landscape in that location and shared many of the characteristics identified². The Council is also satisfied that these assessments remain relevant and have therefore given them due consideration when assessing sites against Criterion 1 – Landscape within the Site Selection Methodology [SSP1].

The **2014 Capacity of Mid Sussex District to Accommodate Development study [ENV19]** identifies primary and secondary constraints to development and identified the most and least sustainable locations for development. The study built on the 2007 Landscape Capacity Study by defining new areas to be used as part of the assessment process to identify landscape capacity and refreshed the assessments. As applied in the study, landscape capacity considers the degree to which the landscape can accommodate change without significant effects on its character and it both considers landscape sensitivity and landscape value. Areas are graded from Low – High in landscape capacity terms. As set out in the Site Selection Methodology [SSP1, Appendix 1] this study forms the evidence to assess impact on landscape (Criterion 1) for those sites outside the AONB.

The **2015 study Mid Sussex District SHLAA: Review of Landscape and Visual Aspects of Site Suitability [ENV20]** was commissioned to review selected site appraisals undertaken for the SHLAA (now SHELAA). The purpose was to provide a detailed and robust assessment of the potential for development, with a focus on landscape and visual impact considerations.

Review of landscape evidence

The landscape evidence was used to support the Adopted District Plan (2018) and the Site Allocations DPD (2022) and neither Inspector considered the landscape evidence was inadequate.

The Council reviewed the landscape evidence and concluded that it was not necessary to update it as part of the District Plan review. The Council considered that the existing evidence remained up to date for the purpose of reviewing the adopted District Plan. The main reason for this conclusion was that sites allocated in the Adopted District Plan and Site Allocations DPD are still under construction or have not yet commenced or achieved planning permission. This means that the Mid Sussex landscape has not changed significantly since the landscape evidence was originally prepared, therefore the conclusions remain unchanged. If the Council had decided to update the evidence, it would be difficult for any updated landscape evidence to fully take into account the landscape impacts of the Adopted District Plan and Site Allocations DPD, as these have

² APP/D3830/W/23/3319542 – Land south of Henfield Road, Albourne (appeal dismissed 5th October 2024)

yet to be fully delivered. The Council will consider updating the landscape evidence for the next plan which can then account for recent developments.

Application

The Council has used the landscape evidence to inform the assessment of SHELAA sites and the site selection process.

Reference	Document Title	Comment
ENV6	Assessment of the Impact of the SHELAA Sites on the High Weald AONB	Paragraph 28 refers to sources of information that have been drawn on to inform the assessment of SHELAA sites. This includes the landscape character assessment that has been added to the Examination Evidence Base.
ENV8	Setting of the South Downs National Park Assessment of SHELAA Sites	Paragraph 4.7 refers to sources of information that have been drawn on to inform the assessment of SHELAA sites. This includes the landscape evidence added to the Examination Evidence Base.
SSP1	District Plan Review: Site Selection Methodology	Criterion 1 refers to sources of information. This includes the landscape evidence added to the Examination Evidence Base.
DP7/DP8	Sustainability Appraisal (Regulation 19/Regulation 18)	The appraisal questions for each sustainability appraisal objective aid the assessment of impact significance. One of the appraisal questions for SA Objective 8: Landscape is whether the approach or proposal will protect and enhance landscape character (DP7, Table 3-6). The four principles for the strategy of the District Plan, alternative spatial options and policies are assessed in the Sustainability Appraisal and this includes an assessment against the landscape objective. Both Regulation 18 and 19 version of the Sustainability Appraisal are informed by the findings of ENV18 and ENV19.

It is important to note that the 2015 study assessments [ENV20] included some of the proposed site allocations for the Submitted District Plan.

Policy	Site
DPSC2	Land at Crabbet Park
DPA7	Land east of Borde Hill Lane, Haywards Heath
DPA9	Land to west of Turners Hill Road, Crawley Down
DPA12	Land west of Kemps, Hurstpierpoint

DPA14	Land at Foxhole Farm, Bolney
DPA16	Land west of North Cottages and Challoners, Cuckfield Road, Ansty

Policy DPC1: Protection and Enhancement of the Countryside requires development proposals to demonstrate they are informed by landscape character. The landscape evidence will also be used to help assess the impact of development proposals on the rural and landscape character.

In conclusion, the Council has used appropriate and robust landscape evidence in the preparation of the District Plan from early stages to Submission and as such considers that this evidence is still relevant and up to date.