

Technical Note

Review of the Landscape & Visual Impacts of a wellbeing and leisure development at Foxbridge Golf Course

Plaistow and Ifold Parish Council

Ruth Childs (CMLI)

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The Proposal, by virtue of its scale and type, far exceeds the site's capacity to change whilst conserving landscape character as set out in Chichester District Council's (CDC) own landscape evidence-base. This scheme is of a significant scale, in a landscape characterised by its small-scale farms and isolated dwellings. This 'destination' development would fundamentally change this character and undermine the valued tranquil, rural undeveloped landscape, CDC Policy seeks to protect.

Whilst in outline only, the application is poor and there are significant shortcomings technically in both the landscape and ecology information submitted. Overall, the effects of this scheme have not been fully acknowledged, some are underestimated, and others poorly explained.

Summary of Effects

In overview, the effects of this proposal upon landscape are likely to be negative and significant. The majority of these would occur regardless of reserved matters. This is because they result from the type, scale, and access of the proposals, all of which are being considered now.

- 1) A change in character from rural and undeveloped to an intense, busy, and incongruous holiday village.
- 2) Erosion of the characteristic rural, small-scale dispersed settlement pattern. Proposals do not relate to an existing settlement.
- 3) Loss of tranquility, dark skies and other valued perceptual qualities which are part of landscape character. These effects would likely be felt more keenly given the site's detachment from a settlement.
- 4) Urbanisation of historic rural lanes, as physical changes are needed to enable the proposed volume of traffic access the site. These will be highways-led and likely inappropriate in a rural landscape, with negative implications for users of the rural lanes - walkers, cyclists, and horse-riders.
- 5) Visual impacts of the development from local vantage points, especially in winter. And potentially from the SDNP (not assessed by the application).
- 6) Dark skies impacts could also undermine the setting of the SDNP. Potential effects upon the International Dark Skies Reserve (IDSR) status (not assessed by the application).
- 7) Direct and indirect impacts upon ancient woodlands, poor 'buffers', missed enhancement opportunities and indirect disturbance from noise and lighting.
- 8) Impacts upon Ecology - likely far reaching, but notably bats and amphibians and potentially many other (protected) species not surveyed for (dormice, breeding birds). Impacts upon the Mens SAC are likely (not assessed by the application).

Landscape is defined in the **Appendix** below. Many policies relate to landscape, the following are key:

Policy 25 - Development in the North of the Plan Area

Requires in particular the conservation and enhancement of rural character and landscape quality.

Policy 45 - Development in the Countryside

Requires in particular proposals to demonstrate they require a countryside location and meet the essential small-scale and local need.

Policy 47 - Heritage and Design

Requires in particular, proposals to conserve and enhance listed buildings and their setting, and historic landscapes. It expects new development to recognise, respect and enhance local distinctive character,

respect the identity of individual settlements, and maintain the integrity of the open and undeveloped character of the area.

Policy 48 - Natural Environment

Requires in particular no adverse impact upon the setting of the South Downs National Park, the tranquil and rural character of the area. It expects distinctive local landscape character to be recognised and contributed to sensitively.

Policy 49 - Biodiversity

Requires in particular, biodiversity value to be safeguarded. Demonstrable harm to protected species or habitats avoided or mitigated.

NPPF Many paragraphs relate to landscape, but mostly **174** and **176**

Landscape Capacity

If a proposal exceeds a landscape's capacity for change, negative effects will arise. It follows that landscape capacity must therefore inform, firstly the principle and then if agreed, the design in order to avoid, then minimise these effects. This is critical where a landscape's character is sought to be conserved and enhanced [Policy 25 and 48].

The Landscape and Visual Impact Assessment (LVIA) demonstrates the proposal far exceeds this site's capacity and landscape harm is the result. The LVIA quotes from Chichester District Council's Landscape Capacity Study (CDC Study), which states that small-scale development could be integrated '*subject to avoiding landscape harm*' [section 9.2]. Then at section 11.1, the LVIA goes on to identify at year 15, the **moderate adverse** impacts on the landscape caused by the proposed scheme.

The CDC Study makes two clear points: i) small-scale and ii) subject to the avoidance of harm. These are explored in more detail below.

What is small-scale?

This question can be answered with reference to the following:

- 1) Chichester District Council's Landscape Capacity Study (terra firma, 2019)
- 2) Appeal Inspectors
- 3) Published Landscape Character Assessments (LCA)
- 4) CDC Local Plan

The application of the term 'small-scale' in coming to a decision must be contextually appropriate. This is because small-scale in one landscape, might be very different to small-scale in another. Each point above is covered in turn.

1) CDC Landscape Capacity Study

- *'Ifold is a hamlet that is unique in Chichester district as a modern 1930-1950's planned residential 'estate'*
- *Varied local building materials of stone, brick, weatherboard and half-timber.*

- *Winding narrow lanes linking scattered hamlets and farms (Plaistow Road).*
- *Woodland assarts and radiating field patterns around settlements.*
- *Wealden scattered farmsteads and cottages.*

Ifold is an anomaly, i.e., it is not characteristic.

Hamlets, farms, and cottages characterise the landscape of and around sub-area 161.

2) Appeal Inspectors

Conserving and enhancing the rural character (including small-scale settlements) of the valued landscapes in this rural part of Chichester District has played a central role in a number of local Appeals. Some examples are provided below.

The Planning Inspector (3 years ago) further corroborates this evidence with his finding for Foxbridge that 10 dwellings close to the historic farmstead would adversely affect this landscape's rural, and undeveloped character. *"...the proposal would nonetheless have an adverse effect on the undeveloped character of this part of the countryside."* And *"...it would still be seen as a substantial built development in a rural setting..."* (Appeal APP/L3815/W/18/3206819)

The proposals to demolish industrial buildings and erect 3 dwelling houses at Little Springfield Farm, located 150m from the Foxbridge site, was dismissed at appeal in 2016 due to the Inspector's concerns that the development would be

Whilst views into the site would be limited, the development would be glimpsed through the trees from Plaistow Road and would:

"appear as an incongruous residential development in a countryside location. The Framework notes that the intrinsic character and beauty of the countryside should be recognised. The tight suburban form of the proposed residential development of this site would not contribute to the distinctive rural landscape character of the area. For the reasons given above I conclude that the proposed development would result in material harm to the character and appearance of the area." (APP/L3815/W/15/3129444).

A further application to develop the Little Springfield Farm site was issued in 2019 for 8 dwelling. The applicant did not appeal the Local Planning Authority's refusal which was due, in part, to the adverse impact the development would have on the landscape character of the area, particularly outside of the Settlement Boundary. When refusing the application, the Planning Officer stated:

"[the] site lies outside of the defined Settlement Boundary and is located in designated countryside..."

"the proposed dwellings would result in an unjustified, unsustainable, and harmful form of development that is located outside the Settlement Boundary..."

“The proposed development by reason of its design, materials, scale, bulk, layout and separation, would appear overly suburban and incongruous in character and would result in significant domestication of the site that would detract from the rural character and appearance of the locality.”

“The proposed buildings, [...] would result in a small enclave of residential development isolated from the main road and from the village. As such the proposal would not constitute high quality development within the countryside...” (19/02182/FUL | Little Springfield Farm Plaistow Road Ifold Loxwood RH14 OTS).

A proposed development for a wood store and garden store on land adjacent to Hardnips Barn, located 1000m from the Foxbridge site, was dismissed at appeal due to its adverse impact on the rural character of the area. When dismissing the appeal, the Inspector stated:

“In addition, an increase in the level of human activity at the appeal site as a result of the use of the building, the use of artificial lighting in or around the building together with any associated external storage would all cause a further progressive erosion of the secluded rural character of the surrounding countryside over time.”

“The building causes unacceptable harm to the character and appearance of the surrounding area. Therefore, the building fails to accord with Policy 25 of the adopted Chichester Local Plan: Key Policies 2014-2029 (LP), as it does not conserve and enhance the rural character of the area and the quality of its landscape. It also fails to accord with LP Policy 45, as it is not well related to the existing group of buildings and the scale, siting and design do not have a minimal impact on the landscape and rural character of the area. Furthermore, the building fails to accord with LP Policy 48, having regard to its adverse impact on the tranquil and rural character of the area, the failure to recognise the distinctive local landscape character and sensitively contribute to its setting and quality, together with the failure to respect and enhance the landscape character of the surrounding area and the site in its detailed design. The building also therefore fails to accord with LP Policy 1, as it does not accord with other policies in the LP.” (Hardnips Barn, APP/L3815/W/16/3150857).

An application for the erection of a single replacement dwelling at Little Wephurst, located 300m from the Foxbridge site, was dismissed at appeal due to the impact of the development on the character and appearance of the area. The Inspector stated: -

“I therefore conclude on the main issue that by virtue of the scale and massing of the replacement dwelling, which is viewed from several public vantage points, it would have an adverse impact on the character and appearance of the area. Thus, I find the development would conflict with policies 33, 40 and 48 of the Chichester Local Plan: Key Policies 2014-2029 which seek to protect and enhance the landscape character of the area and public amenity through detailed design.” (APP/L3815/W/18/3206331)

The Inspector found loss of tranquility to be one of a number of key considerations at Crouchlands Farm (5 years ago) (Appeal APP/L3815/C/15/3133236).

These appeal decisions, which relate to sites close by to the Foxbridge site and which share the same landscape characteristics were all dismissed/refused due to their failure to conserve and enhance the rural character of the area's valued landscapes in this rural part of Chichester District. Notably, these appeals are for extremely modest developments (single replacement dwelling / wood store / 3 dwellings etc.) in comparison to the current development aspirations. It is also noteworthy that nothing has changed to the character of the landscape between the times of these appeal decisions and the current application under consideration.

Experiential qualities such as tranquility are a direct result of other elements of landscape character - a landscape of very small settlements, scattered cottages, small-scale farmsteads, and hamlets all linked by narrow, historic rural lanes, result in dark skies and high levels of tranquility. This large-scale proposal would significantly undermine these fragile characteristics, whilst negatively impacting upon all elements of landscape to one degree or another.

3) Landscape Character Assessments

This landscape characterised by its small-scale and dispersed pattern of settlement. Evidence for this pattern can be found in published Landscape Character Assessments.

National Character Area Profile 121: [Low Weald](#)

'Isolated farmsteads, often occupying ancient sites (some moated), form the predominant settlement pattern, intermixed with small villages, often with 'Street' or 'Green' names suggesting secondary settlement.'

- This LCA suggests farmsteads dominate - small-scale being a farm, a group of buildings.

West Sussex LCA: [North Western Low Weald](#)

'Wealden villages, some centred on village greens, scattered farmsteads and cottages.'

- These descriptions reiterate farms and isolated dwellings characterise this rural landscape.

4) CDC Local Plan

Paragraph 14.2 sums up the ambitions of Policy 25 and the key characteristics of the landscape the Policy is designed to conserve and enhance, including the small-scale pattern of settlement.

Avoidance of Harm

CDCs Study concludes, for the northern part of the site only:

'It is possible that a small amount of additional development may be accommodated within existing clusters of settlement and equestrian centres/paddocks provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness, although great care would need to be taken to avoid any landscape or visual harm.' [my emphasis]

The Study includes landscape guidelines, mitigation and Green Infrastructure (GI) opportunities, to help inform developments, decisions and policy. An appraisal of this proposal against some of these demonstrates

harm has not been avoided, and the little role landscape has played in informing the scheme and the impacts that result:

- *Protect the character of rural lanes - not achieved.* Foxbridge Lane needs to be changed to accommodate this proposal. It would need to be widened and passing places added - suggesting the lanes do not have capacity for this scale of development. This, in addition to an engineered second access and loss of vegetation, will exert an urban, highway-led character upon this sensitive, narrow, historic route, contrary to **Policy 25** and **48**. The indirect impacts of a significant number of additional cars will be both physical and perceptual (damaged verges, noise, air quality).
- *Minimise the effects of adverse incremental change by seeking new development of high quality that sits well within the landscape and reflects local distinctiveness. - not achieved.* These proposals fail to integrate, forcing a new and alien pattern and form of development into this landscape. Local distinctiveness would be undermined, contrary to **Policy 48 2**.
- *Consider the cumulative impact on landscape character of small developments and change. Avoid the introduction of suburban styles and materials. - not achieved.* The visualisations in the DAS demonstrate the use of suburban styles of curved routes, not seen in the wider landscape. These create a suburban, villegiuous character, not a rural one. Repeating house 'types' further emphasise this and do not speak of the Wealden, rural character.
- *Conserve existing tranquil rural and predominantly wooded character of the area and avoid loss of tranquility - not achieved.* Whilst the rural, sparsely settled landscape and its tranquility is clearly a draw for the developer, the development itself fails to acknowledge or be designed sensitively to conserve and enhance these qualities, contrary to **Policy 48 1**.
- *Restore the small-scale field pattern - not achieved.* Field pattern has not been understood in the baseline (LVIA), nor used to inform the layout.
- *Retain the undisturbed rural setting of nearby listed buildings (Foxbridge farm house) - not achieved.* The car parks, and proposed accommodation removes the open rural setting to the farmstead and its listed house. The change of use and subsequent change in character and sheer numbers are likely to negatively impact upon the setting and context to both the medieval farmstead and its listed house.

Setting of the South Downs National Park

Landscape setting is not defined in Guidance or Policy, be it the National Planning Policy Framework (NPPF), Chichester District Council (CDC) Local Plan or South Downs National Park (SDNP) Local Plan or their Management Plan. This is correct, as setting cannot be defined, every site is different and every setting is correspondingly, also different. The importance of setting to protected landscapes, including the South Downs National Park, is set out in a number of places:

1. The update to the NPPF (July 2021) has strengthened the landscape paragraph to include reference to setting (176), it now states:
'The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'
2. CDCs own policies recognise the importance of the setting of the South Downs National Park, which is directly referenced under **Policy 48 - Natural Environment** which requires *'no adverse impact upon the setting of the National Park'*.
3. All public bodies - including CDC are also obliged to 'have regard' to National Park's Purposes and Duty through the National Parks and Access to the Countryside Act 1949. Details of the legislative requirements on public Authorities are set out in the Defra Circular 2010. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

The Applicant's landscape specialist provides very limited, and sometimes poor or confused advice in relation to setting. Clarification should be sought to enable the above points to be properly considered.

The following sets out some examples of shortcomings:

- The LVIA method does not explain how the setting of the National Park has been considered. This is a problem as the LVIA should be transparent and clear in all matters against which the site and changes proposed to it have been assessed. The main implications are i) we do not know if the site contributes in any way to the setting of SDNP and ii) in this regard best practice guidance has not been followed.
- The LVIA states there are no notable views towards the site from within the SDNP [6.5]. Yet a visual receptor is chosen within the SDNP. Then at [6.6] it states that views across the Weald are identified as a Special Quality of the National Park, which should be conserved and enhanced.
 - Which views have been checked to reach this conclusion?
 - Does the site form part of one of these valued Wealden views?
- At [1.3] the LVIA states that the site does not contribute to the setting of the National Park but then copies out some of the aspirations of the NDP which includes *'recognise the importance of the Parish in contributing to the setting of the National Park.'*
- The LVIA includes 'LLCA9 - setting of the National Park' as a receptor. Receptors are *'components of the landscape that are likely to be affected by the scheme'* (GLVIA3). So, its selection as a receptor suggests the National Park is considered by the applicant to be affected somehow by the proposal. Again, the method or process behind identifying receptors is far from clear enough.

- Only a single viewpoint has been assessed from within the National Park.
 - What fieldwork was undertaken to reach the above conclusions; what viewpoints were tested? It is recommended these are requested and considered.

Dark Night Skies

The SDNP is an International Dark Skies Reserve (IDSR). To maintain this status, dark skies need to be conserved, this is the responsibility of decision-makers within and around the SDNP (see above duty of regard).

- The character of the night sky is included in the LVIA method at Appendix I, but unfortunately the method does not explain *how* effects upon this have been assessed. The GLVIA3 recommends working closely with Lighting Professionals to undertake both qualitative and quantitative assessments in relation to landscape and views. This does not appear to have happened and only qualitative assessments have been undertaken, and not in a transparent way.
- The text suggests the assessment of impacts of lighting has been made across the Study Area (which is not shown on a plan but should be as part of an LVIA). No assessment of effects has been made on the dark skies experienced at this site, from viewpoints close to it, or indeed impacts upon the IDSR status of the National Park.
- Thus stating that '*..this increase in lighting would be consolidated to a part of the study area between Ifold and Costrong, which exhibit higher levels of lighting, such that the overall E1: Natural and E2: Rural Zone is considered to remain across the study area*'. The reality is the site is not currently lit and will be lit, both externally and via light spill from buildings and cars. The effect therefore cannot be neutral as the LVIA suggests.
- Yet at 10.48 the LVIA identifies the change in environmental zone from E1 to E2 brought about by this proposal. The implications of this upon local landscape character, for the IDSR and/or setting of the NP have not been understood.
- The ZTV or Study Area appear to have not considered lighting or light spill in their creation.
- The LVIA determines the site lies within both E1 and E2 zones - this is disputed. The site is E1.

In summary the setting of the SDNP has not been adequately assessed in relation to views, landscape and dark skies. It is likely the significant change in lighting from an undeveloped site with no relationship to a settlement, to one of up to 120 lodges, will clearly affect the character of the night sky and is predicted to result in the loss of E1 status. This all points back to landscape capacity and amplifies doubts about whether this an appropriate site for this scale and type of development.

Landscape & Visual Impact Assessment (LVIA)

There are some fundamental flaws in the LVIA, which does not meet best practice professional guidelines. The methodology is poor and has not been discernibly followed. Some aspects of the method do not make sense and the assessment includes poor judgements, conflicting statements, and missing processes. Please read alongside other matters raised which also reference shortcomings in the LVIA. Overall effects have either gone unassessed or underestimated.

The Guidelines for Landscape and Visual Impact Assessment 3, 2013 (GLVIA3) set out the need for designs to iterate, i.e. changes in the design are taken to account for landscape or visual sensitivities and to first avoid then reduce harm in line with the mitigation hierarchy. No discernible design iterations have been demonstrated, suggesting the great care needed has not been taken. The following presents a few examples of shortcomings in the LVIA and their implications:

1. There is no map of the Study Area (a basic requirement for an LVIA) - this should be based upon the extent of predicted effects which, without a Study Area, are less well understood by non-specialists interested in this application.
2. All of the 'opportunities' identified in the LVIA are actually the planning constraints to development. They are not *landscape* opportunities, or ways in which one might deliver characteristic development - so have no place in an independent, objective LVIA. For example: -
 1. *'The site is not covered by any statutory landscape designations....'*
 2. *'The site is an engineered landscape...'*
 3. *'The site is very well physically and visually enclosed...'*
3. The LVIA identifies the South Downs National Park as a receptor of effects, but it is stated the site is not within its setting. Confirmation is needed. The site could comprise the visual, or landscape setting, or both (see **setting**).
4. The LVIA suggests the holiday lodges are somehow different to dwellings or other aspects of the proposal in terms of the harm they cause. This should be challenged, as this distinction is irrelevant in landscape terms. The impacts upon landscape character are the same whether dwelling houses or holiday lodges.
5. Baseline studies are inadequate, notably but not limited to missing historic landscape understanding. An incomplete baseline leads to an underestimation of effects. The impact upon historic character is not assessed and its loss is not acknowledged.
6. A poor selection of receptors allows many effects to go unnoticed/unacknowledged, because individual elements have not been chosen. There is no breakdown of how the proposal impacts upon *all* elements that together characterise this landscape. This means iterative design and mitigation measures have not accounted for *all* of the effects.
 1. Perceptual qualities (tranquility, sense of place etc.), historic landscape character, settlements, historic lanes all have gone unassessed, the effects upon these landscape elements are unknown.

7. Visual impacts are only considered for motorists along Foxbridge Lane. Walkers, cyclists, and horse-riders are more sensitive receptors, but effects upon them are not assessed.

Ecology & Trees

Overall, the Preliminary Ecological Appraisal (PEA) lacks clarity on some key important aspects, and fails to be transparent about the differences between the 2016 and 2022 surveys. The following considers technical aspects of the Report.

- PEA suggests Barbastelle bats recorded on site are part of the functionally linked habitats of the SAC at the Mens. The PEA goes on to suggest they along with many other bat species were recorded using the transects, foraging and commuting over the ponds, and scrub within the site, as well as boundaries (3.3.2.5 PEA).
- This suggests an Appropriate Assessment and shadow HRA may be needed.
- No static surveys were undertaken for bats - meaning all surveys included people on site. Why were no static surveys undertaken?
- The Ecology evidence has not been clearly presented - the difference between 2016 and 22 has not occurred. The badger sett is shown in an image, but no commentary provided about whether this sett was present in 2016 or whether it was being used.
- No breeding bird surveys have been undertaken. Assumptions made about significant opportunities in the hedgerows and trees, but none for ground-nesting birds and no consideration of the implications of disturbance.
- The PEA concludes there would be no disturbance from lighting on bats. There is insufficient information to draw this conclusion and it appears to be contrary to the significant use of the site by bats evidenced in the transect.
- The land management has included taking a hay cut, this suggests there are opportunities for breeding birds, particularly ground-nesting birds. These haven't been surveyed for.
- The PEA does not distinguish in the text which Phase 1 survey it is referring to. So, when dormice were surveyed for, was this in 2016 or 2022? There is a lot of ambiguity in the Report like this for which clarification is recommended.
- Barn owl and dormice are known locally, but neither surveyed for. Retention of the boundary vegetation is considered sufficient in the PEA but this fails to consider disturbance and provision of enhancements to their habitats.
- There is no tree removal plan or Tree Report, just plans and survey results. What is the Arboricultural advice for this site, and what are the implications of the parameters plans/layout for trees?

- The proposed access through the site appears to require the removal of a large number of trees - these are not accounted for in the LVIA or other impact report.

Design

Whilst outline only, the following provides a brief appraisal of the submitted layout/parameter plans, which illustrate the lack of response to local evidence.

- The presence of so many bat species in particular, suggests the capacity of the site is far less than proposed. The amount, intensity of use and recreational pressure (noise, light) is likely to have detrimental effects upon tranquility, dark skies, and ecology, notably bats. This appears to have had little influence over the proposals.
- A constraints and opportunities plan is included in the LVIA, it shows no evidence about ecology or settlements/buildings and overall it has failed to positively inform the layout.
 - Small-scale of settlements is not communicated in the identification of opportunities and constraints.
 - Ecological sensitivities have not been incorporated. Figure 1.1. (Ecology) shows development proposed in areas of known sensitivity.
 - The proposals sever key habitats (ponds) with development, preventing GI/connectivity for wildlife and isolating these features.
 - Curved routes, repetitive types of units with off-the-peg designs all create suburban 'anywhere' character. Together with the excessive numbers form a 'village' character, far removed from the small-scale historic farmsteads and isolated cottages that characterise this landscape.
 - The proposals rely heavily upon a borrowed landscape (i.e., woodlands outside of the site) to make the scheme 'acceptable'. They are outside of the applicants control and could easily be felled, thinned, or succumb to disease or wind blow. The tree planting proposed as mitigation is insufficient and does not conserve landscape character.
 - No characteristic precedent for repeating use of 3-storeys in this rural landscape.
 - The DAS takes precedent images from different landscapes. Petworth is not in the Low Weald, and its historic development, materials, and character are very different to the rural, undeveloped agricultural Low Weald within which the site sits.
 - Clear opportunities to connect isolated ancient woodlands in the north are ignored, favouring development.
 - No restoration of lost field boundaries. These were present before the golf course and back to at least the tithe map (1845). Recommended to be restored in the CDC Study.

Conclusion

In 2019, 10 dwellings and a new golf club house was deemed unsuitable for this site, largely for landscape reasons. Now the proposal is for 120 holiday 'dwellings', with new spa, farm shop and restaurant, with associated parking. These holiday dwellings, are permanent buildings, lived in year-round and accessed by private vehicle. Their impact upon the settlement pattern and undeveloped, rural, and tranquil character is the same as if they were dwellings - whether people live there for 1 week or 10 years makes little difference

to the negative effects in landscape terms. Indeed, some effects may be worse as a result of their holiday use - through potentially more noise and transport movements.

This landscape and its capacity remain unchanged in the 3 years since the Appeal Decision was written. The scale, form and type of development are at odds with this landscape's character and generates significant negative effects which have largely not been acknowledged, or they have been avoided through poor use of language and conflicting statements in the LVIA. The applicant has not sought to undertake a sensitive response to landscape character or acknowledge its capacity, resulting in a change of the site's rural undeveloped character to one of an intense, suburban use.

The heavy reliance upon visual screening to demonstrate acceptability suggests the proposal is incongruous and needs to be screened to be *made* acceptable. Landscape harm is separate from visual harm and can occur whether or not a site can be seen. Required changes to roads is yet further evidence that this scheme is far in excess of the landscape's capacity to receive it. The implications on Ecology, the Mens SAC and the setting of the South Downs National Park and its International Dark Skies Reserve are unknown.