

Landscape Architect Response to Planning Application

**Town and Country Planning Act 1990
The Town and Country Planning (Environmental Impact Assessment) Regulations
2017.**

Date	14th February 2023
Application Number	WSCC/028/21
Description	The continued winning, working and processing of sand from the existing Rock Common Quarry, the importation of inert classified engineering and restoration material, the stockpiling and treating of the imported material, the placement of the imported material within the quarry void and the restoration and landscaping of the quarry.
Location	Rock Common Quarry, The Hollow, Washington, Pulborough, RH20 3DA
Summary Response:	Comment

Comments

1. The application site is located at the Rock Common Quarry to the east of the A24, north of A283, and north-east of Washington, and just outside the boundary of the South Downs National Park.
2. Rock Common Quarry has been active since the 1920s and has been the subject of many planning permissions granted for sand extraction since the 1950s. The current planning permission was granted in 2004 and allows sand to be extracted and processed until the end of 2020. This application seeks to enable the recovery of the remaining sand and to propose an alternative restoration scheme to that previously consented.
3. A Reg 25 request was submitted on 21st December 2022
4. Context/ baseline assessment
 - i. Landscape Character:
The northern part of the site lies within WG7 Storrington Woods and Heaths landscape character area (LCA) and the southern part lies within WG8 Central Scarp Footslopes LCA as identified in the West Sussex Landscape Character Assessment. These WSCC LCA lie adjacent to the boundary of the South Downs National Park (SDNP) and LCA J3:Arun to Adur Scarp Footslopes of the SDNP Landscape Character Assessment.
 - ii. Historic Landscape character:
The site is identified as lying within the Historic Landscape Characterisation Broad Character Type 'Industry'. Historic maps show the former field pattern of the south-east part of the site. Immediately to the south are areas classified as formal/Parliamentary enclosures which may give an indication of the HLC prior to excavation works.
 - iii. Designations:
The South Downs National Park partly encircles the site, lying adjacent to part of the south and eastern boundaries of the site.

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There are no designated ecological sites within the immediate vicinity. There are a number of heritage assets in the surrounding area, the closest being the Grade II Rock Windmill and Rock House, Green Farm House and Sandhill Farmhouse.

- iv. PROW:
Footpath 2701 circumnavigates the quarry to the west and north. Historic maps show a footpath previously crossing the site south-west to north-east towards Rock Mill
- v. Common land and Open Access Land (OAL) :
There is no Registered Common Land or OAL within or adjacent to the site.
- vi. Settlement:
The closest residential properties to the site are Sandhill Farm and Barn, and Washington Caravan and Camping Park to the south-west of the site, Green Farm to the south-east and Rock Mill to the east. The settlement of Washington lies to the south of the A283/The Pike.

5. Relevant landscape-related planning policy:

West Sussex Joint Minerals Local Plan (July 2018- Partial review March 2021)

Policy M2: Soft Sand

Policy M12: Character

Policy M13: Protected Landscape

Policy M17: Biodiversity and Geodiversity

Policy M24: Restoration and Aftercare

West Sussex Waste Local Plan (April 2014)

Policy W11: Character

Policy W12: High Quality Developments

Policy W13: Protected Landscapes

Policy W14: Biodiversity and Geodiversity

Policy W20: Restoration and Aftercare

Horsham District Planning Framework (November 2015)

Policy 25: Strategic Policy: The Natural Environment and Landscape Character

Policy 26: Strategic Policy: Countryside Protection

Policy 30: Protected Landscapes

Policy 31: Green Infrastructure and Biodiversity

Storrington, Sullington & Washington Neighbourhood Plan 2018-2031 (June 2019)

Policy 8: Countryside Protection Views (notably View 14 south-west from The Hollow, across the site)

Policy 15: Green Infrastructure & Biodiversity

6. The submitted Landscape and Visual Impact Assessment

- 6.1. The methodology sets out the approach to assessing landscape and visual effects against receptor sensitivity (which compromises value and susceptibility to change in line with Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third edition guidance at paras 5.3 and 6.3). However, in the assessment (Chapter 8) there appears to be no reference to the sensitivity of the various receptors and how this would impact the magnitude of landscape or visual effect to give a final significance.
- 6.2. A fuller examination of all the elements that comprise landscape (as given in GLVIA para 5.4) and the factors that can help identify valued landscaped (GLVIA Box 5.1) would produce a more meaningful assessment and enable this study to inform the best possible restoration scheme.
- 6.3. The LVIA concludes that the Proposed Restoration Scheme (PRS) would result in a moderate beneficial effect on Landscape Character compared to the Approved Restoration Scheme (ARS) which would result in a minor beneficial effect. (8.12) However, whilst the ARS comprises *'a distinct separation and incongruity with the surrounding landscape character, due to the sheer scale of the lake'* and that *'there is no precedent for such a large body of water viewed at this proximity to the escarpment, outside of the natural floodplain of major rivers'* the applicant considers that the PRS shows the *'recommended mosaic of open water, heathland and woodland would result in an integrated feature, which whilst still reasonably perceived as a restored old mineral site within elevated views, is one within which a more naturalistic, and proportionate in scale mosaic of habitat to that surrounding'*. Whilst the PRS comprises smaller water bodies than the ARS it is not considered that these would be perceived as naturalistic due to their uncharacteristic appearance.
- 6.4. The submitted LVIA fails to assess the view south-west from The Hollow which is identified as valued View 14 in the Storrington, Sullington & Washington Neighbourhood Plan (2018-2031) Policy 8: Countryside Protection.
- 6.5. The assessment of effects on visual receptors within the South Downs National Park (8.29) to the south (Viewpoints 19, 20 21, 22) concludes that the PRS would result in a moderate beneficial effect, despite the presence of the incongruous water bodies. Type 4 Accurate Visual Representations illustrating how the final scheme might appear in these sensitive views would be useful to justify this conclusion.

7. The submitted Final Restoration plan DRCL/RCRA/WP-11

- 7.1. The proposals submitted are a change to the consented 2004 restoration scheme which proposed filling the excavation with water to create a large, deep lake. This approach has been reviewed by the applicant and found to be inappropriate with regards to health and safety, biodiversity, and the potential for contamination from adjacent landfill sites. The revised scheme as submitted proposes part-filling the

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excavation with inert waste and creating a series of 'perched lakes' within this new landscape. There is the intimation in the attached extracts from the Wiston Whole Estate Management Plan (2017) that this new landscape could be used for a new visitor attraction with accommodation in the future, if approval to this restoration scheme is given.

7.2. There is insufficient explanation regarding how landscape character has driven the submitted proposals. Whilst it is agreed that the proposed restoration represents an improvement on the existing *status quo* of the open quarry, in particular when viewed from the South Downs to the south, other proposals should be explored which better draw on the Landscape Character and more closely restore the landscape to its pre-excavation form, complete with historic field pattern and footpaths.

7.3. As stated in per Policy M24:

Proposals for mineral extraction and temporary minerals infrastructure development will be permitted provided that they are accompanied by comprehensive restoration and aftercare schemes that:

(c) are appropriate to their locations, maximising benefits taking into account local landscape character, the historic environment, biodiversity gain, priority habitat creation, and wider environmental objectives;

d) where appropriate, re-instate, and/or re-route, and where possible, improve public rights of way and maximise public amenity benefits;

7.4. In addition, Policy W11 states that,

Proposals for waste development will be permitted provided that they would not have an unacceptable impact on:

'(a) the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics);

7.5. The southern boundary of the site lies adjacent to the South Downs National Park (SDNP) and therefore contributes to its setting. As such, any development (including quarry restoration) needs to be mindful of the statutory purposes of the park and its duty:

Purpose 1: *To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*

Purpose 2: *To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.*

Duty: *To seek to foster the social and economic wellbeing of the local communities within the national park in pursuit of our purposes.*

The Special Qualities of the SDNP include:

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SQ1: 'Diverse, inspirational landscapes and breath-taking views;

SQ3: 'Tranquil and unspoilt places';

- 7.6. As noted in the submitted LVIA, The South Downs National Park: View Characterisation and Analysis Study (2015) identifies

'Views from the scarp looking north across the Low Weald'

which the applicant states (para 5.45-5.46);

'represent[s] the stunning panoramic views that are recognised as contributing to the Park's special qualities. The view type also reveals the tranquillity of the downs as a result of the lack of intrusive development and sense of space.... Threats to this view type include: 'changes that affect the iconic habitats of the scarp, disrupt or alter the scale and shape of field patterns, change the distinctive settlement pattern of small historic villages, or form intrusive new developments within the view either by day or night.'

Whilst the field pattern has already been disrupted by the previous excavations, the proposals miss an opportunity to restore, even in part, the field patterns as presented in Extracts A-D of the submitted LVIA (pg 43).

- 7.7. Whilst the proposed scheme is an improvement on the previously consented scheme's single, deep, lake it is still not considered wholly appropriate to the landscape character. The proposed smaller lakes, whilst promoted as a 'dry' landform, are still considered uncharacteristic of this setting. The proposals neither seek to restore the landscape to its pre-excavation state nor retain and enhance the final excavated landform, as part of the evolving history of the landscape, but appear to be driven by a desire to create a lakeside holiday village in the future.
- 7.8. The proposed 'semi-filled' landform would require approx. 8 years to infill to the proposed levels with inert fill and longer if the landform were to be fully restored to pre-excavation levels of circa. 60m. This would involve a considerable amount of lorry movements at detriment to the tranquillity of the local area and the adjacent South Downs National Park.
- 7.9. The hydrology of the site is complex but consideration should be given to solutions which allow natural systems to return as far as is possible without the need for artificial pumping. If landfill is required to raise the ground levels and remove the need for pumping of ground water then it would be helpful to understand the minimum levels required to achieve this and what has driven the decision to restore to the levels proposed.

8. Conclusion

- 8.1. To summarise:

Further information is required regarding:

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- The assessment of landscape and visual effects and how sensitivity (comprising value and susceptibility to change) and landscape value have been considered.
- The rationale behind the current landscape proposals and how they respond to landscape character and the findings of the landscape and visual baseline study.
- Alternative schemes which would better respond to the existing and historic (pre-excavation) landscape character including working with the hydrological systems on site.
- Type 4 Accurate Visual Representations illustrating views across the PRS from the South Downs