

Addendum Planning Statement

Proposed construction of landscape enhancement features using imported inert materials, together with provision of public access and amenity; comprising revised landform and details to WSCC/029/18/SP

**in respect of Land at Knepp Castle Estate,
West Grinstead, West Sussex**

Prepared for

Sir Charles Burrell

Prepared by

Dale Mayhew BA (Hons) BTP MRTPI

April 2020

Version - FINAL

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Appendices

Appendix 1	Ecological Impact Assessment - November 2019 and Associated Appendices and Reports
Appendix 2	Baseline and Verified Photowire Viewpoint Photographs in respect of Viewpoints VP1A, VP16, VP17 and VP21
Appendix 3	Landscape Masterplan (Drawing No: RCo201/12 (North) and RCo201/13 (South))
Appendix 4	Draft Public Path Creation Agreement
Appendix 5	Stage 1 Road Safety Audit - Gateway TSP Road Safety Engineering
Appendix 6	Drawing No: RCo 201/15 - Public Car Park Layout
Appendix 7	Drawing No: RCo 201/14 - Acoustic Fencing Detail

1. INTRODUCTION

- 1.1. This Addendum Planning Statement has been prepared in support of a full planning application for works to construct landscape enhancement features using imported inert materials, together with the provision of public access and amenity on land at Knepp Castle Estate, West Grinstead.
- 1.2. A full planning application for this scheme, including an Environmental Statement as required by the Environmental Impact Assessment Regulations 2017 (S.I. No: 2017-571) was submitted to West Sussex County Council (WSSCC), as Local Planning Authority (LPA) in December 2020.
- 1.3. In response to this, the LPA have requested the submission of additional information, prior to the validation of the application and commencement of the statutory consultation process.
- 1.4. This Statement and the associated appendices comprise the request addendum information.

2. ECOLOGICAL IMPACT ASSESSMENT - ENVIRONMENTAL STATEMENT - APPENDIX 5

- 2.1. The LPA have advised that Appendix 5 of the Environmental Statement, submitted in December 2019, was not included in the uploaded documents. Appendix 5 comprised an Ecological Impact Assessment and associated documentation.
- 2.2. This information is now enclosed at Appendix 1 and comprises:
 - Ecological Impact Assessment - November 2019;
 - Appendix 1 - Figure 1A of Ecological Impact Assessment;
 - Appendix 1 - Site Photographs of Ecological Impact Assessment;
 - Potential Bat Roost Feature Survey of Trees Proposed for Removal - November 2019; and
 - Emergence/Re-Entry Bat Roost Surveys of Trees with High Bat Roost Potential Earmarked for Removal.
- 2.3. These documents are intrinsic part of the Environmental Statement submitted in December 2019, and are referenced in the supporting information .

3. LANDSCAPE AND VISUAL IMPACT - ENVIRONMENTAL STATEMENT

- 3.1. The LPA have requested the submission of verified photo montages and visualisations to accompany the planning application.
- 3.2. Following subsequent dialogue, with the LPA, additional information was provided that indicated the information should follow the best practice approach set out in the Landscape Institute Technical Guidance Note TGN/06/19 'Visual Representation of Development Proposals' and associated supporting reports.

The LPA have confirmed that they, and their Advisors, are unable to confirm which views identified in the Scoping Opinion should be the subject of visualisation (Type 1 (annotated viewpoint photography), Type 2 (3-D wireline/model), Type 3 (photo montage/photowire), or Type 4 (scalable/verifiable photo montage/photowire)). They confirmed the need for a proportionate approach with fully verified/rendered views only required for viewpoints with the potential for significant visual effect. This should be ascertained through an iterative process.

- 3.3. The Planning Application submissions, dated December 2019, included a Landscape Visual Impact Assessment (LVIA), which was accompanied by viewpoint photography. These were undertaken by a qualified Landscape Architect. This information was presented at Appendix 3 and 4 of the Environmental Statement.
- 3.4. This information was considered sufficient to enable the LPA's assessment of the predicted landscape and visual impacts of the proposed scheme. The applicants appraisal was set out in Section 5 and Section 6 of the LVIA, with a Viewpoint Analysis detailed at Appendix A of the LVIA document.
- 3.5. Notwithstanding these submissions, the LPA have requested the submission of additional photographic imagery.
- 3.6. In response to this, Tomo Graphics Ltd were instructed to provide verified viewpoints, in accordance with the latest Landscape Institute Technical Guidance Note. The firm has over 25 years experience in producing photographics for the planning and architecture industry.
- 3.7. The viewpoints were undertaken by Tomo Graphics, in conjunction with and supported by, Maltby Surveys Ltd providing requisite supporting topographic data of the photograph viewpoints.
- 3.8. Having regard to the LVIA and Viewpoint Analysis, and as discussed with the LPA, it is considered that the main potential effect of the scheme in visual and landscape impact terms (in comparison to the extant part-implemented consent), relates to the northern part of the site, known as Buck Barn. This is the area located to the north of Hill House Farm, to the south of the A272, and immediately to the west of the A24.
- 3.9. The Viewpoint Analysis detailed a number of viewpoints within and towards this area. This comprised Viewpoint 01A; VP15; VP16; VP17; VP18; and VP21.
- 3.10. Having regard to the appraisal of these viewpoints, and the details submitted with the Viewpoint Analysis, it was concluded that the additional photographic imagery work would be undertaken in relation to the following viewpoints:
 - Viewpoint 01A - Knepp Castle looking northeast/easting;
 - Viewpoint 16 - A27 looking southwest/easting;
 - Viewpoint 17 - Private land south of Buck Barn Cottages looking south/easting; and
 - Viewpoint 21 - A27 west of Waterloo/Sunny Hill Cottages looking west/easting.

- 3.11. For each of these viewpoints, Tomo Graphics Ltd undertook additional baseline photography, which were then used to produce verifiable photowire images to confirm the visual effect of the proposed landscape works from each viewpoint. This work has been undertaken in full accordance with the Landscape Institute best practice.
- 3.12. This information comprises an aerial image identifying the viewpoint locations, baseline photographs of each relevant viewpoint and subsequent verified photowire imagery for each viewpoint, and is attached at Appendix 2.
- 3.13. The photowire imagery details the extent of the proposed landscape feature from each relevant viewpoint. The imagery denotes (i) the extent of the proposed works which would not be visible in view, in a blue dotted line; and (ii) the extent of the proposed works that would be visible in view, in a solid red line.
- 3.14. The imagery confirms that in a number of viewpoints (e.g. Viewpoint 17 and Viewpoint 21), the visual effect of the proposed works will be less impactful than the existing extent of the landscape enhancement features. This is due to the application proposals to reduce the height of the landscape enhancement features around the eastern and northern edge of the site. Although the proposed landform would be overall higher than the existing, the increase in height would be positioned away from site boundaries, and the effect of the proposal, as evidenced in the verified photowire, will be less impactful in landscape and visual terms from the viewpoints than the existing landform.
- 3.15. The overall effect from a number of these viewpoints, is the proposed works will appear lower in the skyline, than the existing landscape enhancement features.
- 3.16. From a number of viewpoints (eg, Viewpoint 1A and Viewpoint 16), it is pertinent to note that the raised viewing platforms, installed for the LPA's site visit in July 2019, are indicative of the highest level of the proposed landscape enhancement feature. They provide a proxy in these longer range views, for the maximum proposed height of the scheme, albeit the position of these viewing platforms is some 60m further north than the crest-point of the proposed landscape feature.
- 3.17. The verified photowire images affirm the conclusions of the landscape and visual impact of the scheme set out in the LVIA within the Planning Application submissions of December 2019.

4. LANDSCAPE MASTERPLAN

- 4.1. The LPA have requested the submission of a Landscape Masterplan.
- 4.2. The planning application documentation submitted in December 2019 included Drawing No: RCo 201/Figure 01 - Revision 05, which comprised a Masterplan Layout, including proposed indicative landscaping.
- 4.3. In response to the LPA's request, this is now amplified by the submission of the following drawings at Appendix 3:

- Drawing No: RCo 201/12 - Landscape Masterplan - Sheet 01 - North; and
- Drawing No: RCo 201/13 Landscape Masterplan - Sheet 02 - South.

4.4. This provides additional detail, in response to the requested Landscape Masterplan.

5. NEED STATEMENT

- 5.1. The planning application documentation submitted in December 2019 was accompanied by extensive supporting information, including a Planning Statement. This detailed full consideration of the relevant material considerations in relation to the application.
- 5.2. Notwithstanding this, the LPA have requested the submission of a further 'Need Statement'. It has been requested that this should detail the likely type and source of the material to be imported, and the shortfall in capacity the proposal would seek to address, with reference to the West Sussex Annual Monitoring Report (AMR).
- 5.3. The material thus far imported to the site in the implementation of the extant planning permission is sourced from the local area (circa 20 minute drive time) and primarily comprises materials arising from, and surplus to, the implementation of development projects. Most commonly, this comprises soils arising from housing schemes. The is clean, inert material.
- 5.4. This material is sourced, in accordance with the availability at the time of the implementation phase. It is not possible to determine the precise location and source of material that might be arise in circa 24 months time. However, by reference to the material used in the implementation of the project thus far, it is likely it would be sourced from housing projects in and around built-up areas a short way to the north of the site, such as Horsham, Southwater and Billingshurst.
- 5.5. The West Sussex AMR presents data held and obtained by the County on an annual basis. The most recent monitoring report available within the public domain relates to the period 1st April 2017 to 31st March 2018. The AMR sets out updates on matters including the progress of the Local Plan, aggregates, non-aggregate minerals, waste, planning applications, enforcement/monitoring, and the duty to cooperate.
- 5.6. In respect of this proposal, the most relevant information is contained within Chapter 5 of the AMR. This details material arising from West Sussex County under Waste Management Regimes, categorised into three principle sources, including 'construction and demolition waste.' The AMR makes clear that this categorisation includes a range of different materials, which may not be inert.
- 5.7. Chapter 5 of the AMR sets out that arisings from construction and demolition for the period 2017/2018 was 1,295,000 tonnes. It notes that this is an increase of 304,000 tonnes from the base case growth rates used to prepare the Waste Local Plan in 2014 (949,000 tonnes). It notes the amount of construction and demolition waste going to landfill has increased, albeit much of this comprises the restoration of non-inert landfill sites, which WSCC regard as 'recovery.'

- 5.8. The AMR notes that the West Sussex Waste Local Plan (2014) estimated that construction and demolition arisings could be between 949,000 and 1,049,000 tonnes in 2031 under different growth rate scenarios. It notes that if a 0% growth rate is applied to the baseline figure for 2016/2017, a total of 1,295,000 tonnes would need to be managed in 2031. This is an increase of 346,000 tonnes over the base case scenario projections in the Waste Local Plan. It notes that given the total amount of construction and demolition arisings in West Sussex is 1,295,000 tonnes and 1,191,000 tonnes (construction and demolition arisings managed at sites in West Sussex recorded in Waste Data Interrogator) was managed in West Sussex, then West Sussex is a net exporter of construction and demolition arisings.
- 5.9. This demonstrates that by reference to the AMR, there is a requirement to provide additional capacity for deposition of construction and demolition arisings in West Sussex to ensure 'self-sufficiency' can be achieved.
- 5.10. Having regard to confirmation in the AMR of the increased quantum of construction and demolition arisings, an increase in the amount of this going to landfill, and the County is a net exporter of this material stream, it is submitted that there is a clearly identified need for locations to be found within the County to accept construction and demolition arisings. This application proposal, as with previous planning permissions on this site, represents a recovery operation, which is equivalent or higher up the hierarchy than disposal.
- 5.11. It is thus submitted that the proposal will meet a clearly established need.

6. PUBLIC RIGHT OF WAY

- 6.1. The extant approved scheme on the site includes, upon completion of the project, the provision of a new Public Right of Way (PRoW). This runs north from the existing (east-west) PRoW at Floodgates Farm (No. 1875) to the A272. In broad terms, the route of this new PRoW follows an existing track, and then over the higher ground of the new landscape enhancement features, terminating at the A272 at the point of the existing construction access.
- 6.2. The planing application documentation submitted in December 2019 sets out proposals for the delivery of a new final landscape enhancement landform. In conjunction with this, it is proposed to amend the alignment of the approved PRoW. This is to ensure that future users secure the amenity benefit from the improved character of the new landform, including enhanced views, in particular of heritage assets. The proposed new route of the PRoW would follow, in part, the crest-line of the new amphitheatre contained within the Buck Barn area of the site. Details of the proposed new alignment are detailed on the Landscape Masterplan (Drawing No: RCo 201/Figure 01 - Revision 05).
- 6.3. The LPA have requested that these submissions be supported by a draft of the proposed Legal Agreement that relates to this amended PRoW. This is attached at Appendix 4. It is proposed that final details of the PRoW alignment, be further discussed during the progress of the planning application.

7. STAGE 1 ROAD SAFETY AUDIT

- 7.1. The planning application documentation submitted in December 2019 was accompanied by extensive supporting information, including a Transport Statement produced by Motion Highway Consultants. This was attached at Appendix 8 of the Environmental Statement. This was produced in light of discussions with West Sussex County Council Highway Authority. It concludes that the:

“The level of daily HGV movements estimated to be associated with the importation of 250,000 cubic metres of material over 3 years is in line with that which was approved in the original landscape application works. On this basis, it is considered there is no requirement for more detailed junction modelling, or mitigation.”

- 7.2. Notwithstanding this, the LPA have requested that the application be supported by a Stage 1 Road Safety Audit.
- 7.3. This has been produced by Gateway TSP, Road Safety Engineering, and is attached at Appendix 5. It confirms that no problems have been identified by the Road Safety Audit Team in respect of general matters; local alignments; junctions; walking, cycling and horse-riding; or traffic signs, carriageway markings and lighting.
- 7.4. This affirms the conclusions of the submitted Transport Statement.

8. CAR PARK LAYOUT

- 8.1. The planning application documentation submitted in December 2019, includes proposals for the provision of a new car park located immediately to the north of Floodgates Farm. This is to be made available to visiting members of the public to provide improved access and facilitate use of both existing and proposed PRowS in and around the Knepp Castle Estate.
- 8.2. The LPA have requested the provision of additional drawing details of this proposed car park.
- 8.3. In response, attached at Appendix 6 is Drawing No: RCo 201/15. This details the proposed car park layout, confirming it would be suitable for up to twelve vehicles, including two disabled spaces. This is to be accessed via the existing track that runs north through Floodgates Farm, and which reflects the alignment of the approved, and proposed, new PRow. It is therefore well placed to serve the needs of existing and future users of the local PRow network.
- 8.4. The drawing details the proposals for the car park to be delineated around its perimeter by proposed native species hedgerow and hedgerow tree specimens.
- 8.5. Given its siting, and proposed design detail, it is considered this would not have any undue impact on visual amenity or landscape character. It would represent a significant benefit in respect of public amenity for users of the PRow.
- 8.6. It is proposed that this car park provision be secured by planning condition, attached to any grant of consent. Notwithstanding this, it is noted on a strictly without prejudice basis, that control could alternatively be exercised through a Legal Agreement, the details of which could be discussed and agreed as part of the PRow Legal Agreement, given the close nexus of the car park with the PRow.

9. ACOUSTIC FENCING

- 9.1. The planning application documentation submitted in December 2019 set out proposals for the provision of a number of areas of acoustic fencing to support and connect to the landscape enhancement features. This is to ensure that collectively they provide a comprehensive acoustic screen of, and along, the A24. The position of the acoustic fencing builds on details in the extant approval, and were set out in the Landscape Masterplan that accompanied the most recent submissions (Drawing No: RCo 201/Figure 01 - Revision 05).
- 9.2. Notwithstanding this, the LPA have requested the submission of additional drawing detail of the form and location of the fencing.
- 9.3. In response to this, additional enlarged detailing of the location and alignment of the acoustic fencing is set out in the Landscape Masterplan drawings that are attached at Appendix 3 (Drawings No: RCo 201/12 and RCo 201/13).
- 9.4. Further detail of the proposed appearance of the acoustic fencing is contained in the elevation drawing attached at Appendix 7 (Drawing No: RCo 201/14). This details proposals for fencing that would be 2m in height, comprise tongue and groove timber boarding to provide a continuous timber fencing face which would be affixed into the ground via the use of steel beams typically set at some 2.4m apart.

10. SUMMARY

- 10.1. This Addendum Statement comprises additional information, that has been requested by the LPA, to supplement the original submissions for this full planning application, submitted in December 2019.
- 10.2. It is requested that this addendum information be added to, comprise part of, the planning application pack.
- 10.3. In light of these submissions, it is requested that the application be validated and the statutory consultation process commenced.