

WSSC Landscape Architect Response to Planning Consultation

Date	21st May 2020
Application Reference	WSSC/019/20
Description	Proposed construction of landscape enhancement features using imported inert material, together with the provision of public access and amenity; comprising revised landform and details to WSSC/029/18/SP
Address	Knepp Castle, West Grinstead, Horsham, RH13 8LJ
Summary Response	Holding objection pending further information

Planning history

The proposals being considered are an evolution of part of the 'Knepp Castle Deer Park: Restoration Management Plan', originally prepared by Colson and Stone landscape architects in May 2000. Several planning applications and consents since have each contributing in part to facilitating delivery of that long-term vision for the estate.

The proposals being considered comprise a number of changes to a range of landscape enhancements to the east of the estate, but do not seek to make changes to the previously consented and largely implemented works to the estate pond and wetland.

Landscape enhancements similar in nature to those currently being proposed were first considered by WSSC within application WSSC/070/10/AR. Those proposals included (in addition to the restoration of Knepp Mill Pond by dredging) the creation of a Tor landform feature in the north east of Knepp Park and the construction of central and southern landscaped bunds along the eastern boundary of Knepp Park.

At that time, WSSC's Senior Landscape Architect was supportive of the proposals, but suggested a number of proviso conditions.

However, planning application WSSC/070/10/AR was withdrawn, and revised proposals were submitted in 2011, reference WSSC/028/11/SP. In order to address previously raised concerns regarding a perceived limited wider public benefit of the scheme, extra provision of public access and recreation opportunities were proposed (including a permissive right of way, viewpoints with seating, picnic facilities and information boards). Moreover, concerns previously raised regarding the volume of imported inert materials were addressed through a re-design of the proposed landscape enhancements, substantially by removing the Tor feature in the north east of the estate.

WSSC's Senior Landscape Architect was supportive of the revised proposals, subject to a number of proviso conditions. However, notably she commented that *"it is regretful from a landscape design point of view that the revised proposed landform is now less distinctive/watered down from that originally proposed."*

Planning application WSSC/028/11/SP was granted consent in October 2012. Since then various applications have been considered, mostly relating to implementation details and time for completing the works, or methodology for dredging the Mill pond and deposition of arisings from the dredging. These applications are of no direct consequence for considering the current landscape proposals.

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Application WSCC/064/16/SP granted consent to extend the implementation period, subject to various conditions which included a requirement for landscape details to be submitted for approval. Accordingly, details were submitted in May 2017, and subsequently approved.

Review of submitted application documents

Drawings detailing Landform proposals:

- All of the submitted plans showing contours of the proposed landform include an anomaly to the eastern side of the Buck Field area, approximately 140m north of Hill House Farm. 3 contour-lines are incomplete. Accordingly, it is not possible to tell what landform is intended between these contour lines, and the continuation of these lines some 190m or-so to the north. The details of the landform as they stand are therefore not enforceable, and accordingly not acceptable.
- The submitted sections do not extend further than the edge of the site. Accordingly, it is difficult to gain an understanding of how the proposed landform would relate to the surrounding landscape.

Drawings detailing Planting proposals:

- The proposals currently under consideration (as per drawings RCo 201/12, and RCo 201/13 (by Ramsay & Co Landscape Architecture, dated 10/02/2020)) give no detail of what treatment is intended for the areas to be re-profiled, wherever they are not to be planted with tree and shrub species. It is assumed that the intent would be for these areas to include wildflower grass seeding, as per the equivalent areas of the consented scheme. *
- The proposals currently under consideration indicate much of the planting areas are either understory shrub planting (60-90cm nursery stock), or feathered shrub specimens (150-175cm height). Proposed tree specimens (10-12cm girth / 3.0-3.5m height) are scattered throughout the areas of understory shrub planting, and occasionally within the adjacent open spaces.
- The proposed planting regime does appear to be broadly in-line with the 're-wilding' philosophy being advanced throughout the estate, which has been previously accepted by the WSCC Senior Landscape Architect.
- However, the submitted drawings do not stipulate certain details, such as plant species, size and density, planting and cultivation technique etc.

Documents relating to Landscape and Visual Impact:

Whilst the submitted LVIA is thorough, I believe that the assessment work within it has not adequately followed the approach set out in the third edition of "Guidelines for Landscape and Visual Assessment" published in 2013 by the Landscape Institute and the Institute of Environmental Management and Assessment.

The format of the submitted LVIA is somewhat confusing. It is usual for LVIA's to identify sensitivities, and the magnitude of change applicable to clearly identified, individual landscape and visual receptors, following which it is possible to gauge the effect of the proposed development (and give a view on its significance). The submitted LVIA does not include this level of analysis, and as-such it lacks robustness.

In order for the study to be useful / informative for the Planning decision making process, assessment should be undertaken in an objective and measurable way. In particular, the study should show its workings. Paragraph 3.29 of GLVIA3 should be noted, as follows:-

Combining judgements should be as transparent as possible. It is common practice to arrive at judgements about the significance of effects simply by combining the judgements about the sensitivity of the receptor and the magnitude of the effect. This can be useful, but is also an oversimplification unless it is made clear how the judgements about sensitivity and magnitude have themselves been reached.

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- I am not clear whether the effects of the proposals are considered in relation to the consented development, or the conditions on the ground at a time prior to commencing the earthworks associated with the consented development.
- The consented scheme is considered to be the baseline situation in Planning terms, so assessing the landscape and visual effects should measure the difference between the proposed and the approved, not the proposed and the pre-existing, as confirmed by paragraph 4.5 of the WSSC Scoping Opinion issued on the 6th September 2019.
- It is noted that paragraph 3.2 states “*Consideration of the previous assessment of the consented works are relevant to the current proposal.*”
- However:-
 - Paragraph 3.7 refers to the completed lengths of the consented landform which have been constructed to date, and suggests that “*substantial landscape benefit has arisen due to reducing the sensory effects of the A24 dual carriageway on the Registered Parkland and Knepp Castle’s setting*”. Paragraph 5.3 then goes on to state that the proposed Buck Barn park landform “*will have beneficial effects on the landscape character of substantial significance, as it **will** [my emphasis]... form a screen that reduces the negative effects of the A24 dual carriageway on both the Registered Park and the setting of Knepp Castle*”. Paragraph 5.5 draws a similar conclusion. This implies that the substantial benefit of the consented scheme (which has already been delivered) was disregarded, and this was the basis for calculating the landscape effects associated with the new proposals works.
- The ‘summary of effects’ table at 5.15 includes a column relating to the significance of the effects of the consented scheme, and a separate column relating to the significance of the effects of the proposed Buck Barn and Floodgates Farm park landform. However, it would seem that the judgements within both of these columns relate back to the baseline conditions prior commencing the earthworks associated with the consented development.
- I do not believe that the difference between the consented and the proposed is of such great magnitude as is implied by the ‘summary of effects’ table at 5.15. I feel it is unlikely that an objective LVIA considered against an appropriate baseline would consider the benefits of the proposal over and above the benefits of the consented scheme as ‘significant’.
- The LVIA does not confirm what visual baseline conditions its visual assessment relates to. There is no reference to the consented scheme within the sections relating to visual appraisal, or within the viewpoint analysis at Appendix A. However, there are several references to the proposed landform ‘visually screening the A24’ following construction. This suggests that the effectiveness of the consented / partially delivered landform in already visually screening the A24 has been disregarded, and the description of the benefits of the proposed scheme are as-if those benefits had not already been achieved by the consented scheme.
- Paragraphs 6.6 to 6.8 (within the ‘Predicted Visual Impacts’ section) refer to ‘Temporal cumulative effects’, although all of the effects described are of a landscape nature, rather than a visual nature.
- The submitted LVIA is dated November 2019, by Krystyna Campbell, CMLI. Within it, para 6.2 refers to photographs taken by Andrew Ramsay on 5th December 2019 (which accords with the submitted photographic records). This suggests that the LVIA and photographic survey were not entirely synchronised, and I would question the ability of a Landscape Architect to undertake the assessment of landscape and visual effects if they had not personally experienced the baseline conditions.
- The assessment of landscape effects (as per the ‘summary of effects’ table at 5.15 takes into account the proposals for Buck Barn and Floodgates Farm park landform. However, there does not seem to have been any assessment of the potential landscape effects associated with the proposals for Hill House Lawn. It is appreciated that the proposed landform here is very similar to that already consented. However, other elements of the landscape are different within the latest proposals, such as the distribution of proposed trees and shrubs. These this should be taken into account.

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- The landscape receptors referred to in section 5 (Predicted Landscape Impacts) are not clearly related to receptors referred to in section 3 (Existing Baseline). Paragraph 3.9, with the heading 'Landscape receptors' is written as a vague narrative paragraph, rather than specifically identifying individual receptors that are then carried forward to the assessment.
- No assessment is made of the sensitivity of any landscape receptor, either in Section 3 or Section 5. Accordingly, it is not clear how the significance of effects has been calculated, implying a subjective judgement rather than an objective assessment.
- Similarly, the visual receptors are referred to in broad terms within section 3, and no individual accounts are given to describe the baseline view composition at the various representative viewpoints referred to within the 'viewpoint analysis' table at Appendix A.
- The submitted LVIA does not include a key plan showing the positions of the representative viewpoints to which it refers.
- Descriptions of visual receptor sensitivity are not given within the 'viewpoint analysis' table, whereas descriptions of effects, and their magnitude' is stated. Accordingly, it is not clear how the significance of effects has been calculated, implying a subjective judgement rather than an objective assessment.
- The verified photowires submitted with the application are dated March 2020, whereas the LVIA is dated November 2019. Accordingly, assessments made regarding the magnitudes of visual effect have not had the benefit of having been informed by the verified photowires. Producing the verified photowires as a 'standalone' exercise does not achieve the purposes for which the photowires were requested by WSCC. These photowires are not sufficiently informative without being accompanied by some discussion in accordance with LVIA evaluation criteria.

Review of submitted landscape design

Notwithstanding arrangements for implementing the works, a summary of the submitted proposals and how they differ from the consented development follow:-

Buck field:

- The proposed landform takes a deliberately sculptural form, deviating from the previously consented landform which took a deliberately naturalistic form. This change of approach is not dissimilar to the design philosophy of the 'Tor' feature landform originally proposed (and withdrawn) in 2010, which had the support of WSCC's Senior Landscape Architect at that time.
- The proposed sculptural landform now rises to just over 31m AOD, which is 3m higher than the consented naturalistic landform. The proposed landform as a whole is a larger mass than that consented (with an increase of 225,000m³). However, position of the proposed landform, and notably its crest, would be further south-west than the consented landform, and accordingly at an increased distance from the site boundaries interfacing with the A272 and A24 highways and adjacent properties.
- The landform proposed would grade up to its peak from the northern edge of the estate (to the rear of Buck Barn Bungalows) more shallowly than the consented landform. However, the gradient to the west would be considerably steeper than the consented landform.
- The proposals include a significant extent of planting to the northern section of the Buck Field landform. This planting would be visible from around the A272 / A24 junction, forming a backdrop to the petrol station. This would effectively increase the height at which massing associated with the proposed development would meet the sky. I.e. the proposed tree canopies would form a horizon-line, which would be more elevated than if the landform were 'bare earth' (the scenario portrayed in the submitted 'wire-line' verified visualisations). However, planting here would be consistent with previous advice given by WSCC's Senior Landscape Architect in 2010, which stated that "*The existing right-angled boundary with the service station would benefit from being softened and 'lost' in further planting*".

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- Where not planted with native trees and shrubs, the consented design includes wildflower grass seeding. The submitted drawings do not confirm the intent for the equivalent open-space (although it is assumed that it would be wildflower grass seeded). *
- The addendum Planning Statement explains that the application proposes to reduce the height of the consented landscape features along the eastern and northern edges of the Estate. In referring to the submitted verified massing studies, the Planning Statement goes-on to explain that the overall effect of reducing the landform in relative proximity to receptors along the A272 and A24, and instead creating a new landform, albeit slightly higher, further within the estate, “is that the proposed works will appear lower in the skyline than the existing [consented] landscape enhancement features.”

Hill House Lawn:

- The proposed and consented landscape associated with Hill House Lawn are similar in nature. Both propose a naturalistic landform, sloping steadily down to the west, with a curving footpath running along a ridgeline formed towards the east of the area. The proposed landform would be 1m higher than the consented, and extend further to the west.
- The consented design includes several groups of trees in clumps within the grassed area, whereas the proposed design leaves the equivalent space open. However, the proposed design does include a significant belt of shrub planting with occasional tree specimens on the steeper, east-facing slope, east of the proposed footpath. This planting would fill a gap between the footpath and the existing treebelt along the western side of the A24.
- Where not planted with native trees and shrubs, the consented design includes wildflower grass seeding. The submitted drawings do not confirm the intent for the equivalent open-space (although it is assumed that it would be wildflower grass seeded). *

Floodgates Farm landscape:

- The consented Floodgates Farm landscape includes an ‘L’ shaped, engineered bund along its northern and eastern edges, whereas the proposed Floodgate Farm landscape would be a more naturalistic landform, with a ‘parkland’ appearance. The proposed landform would be no taller than the consented bund, but it would be considerably wider, extending westwards across the field to the access track at its western side.
- Where not planted with native trees and shrubs, the consented design includes wildflower grass seeding. The submitted drawings do not confirm the intent for the equivalent open-space (although it is assumed that it would be wildflower grass seeded). *
- Both the consented and proposed landscape designs included the planting of a native tree and shrub belt along the eastern and northern edges of this parcel of land. The consented design also includes a number of specimen trees in groups within the grassed area.
- The proposed landscape includes a small car-park for public use at the southernmost end of the field. This would be immediately adjacent to the existing car-park associated to the business premises to the south. The submitted ‘Public Car Park Layout’ drawing (ref: RCo201/15 Rev00) shows a proposed native hedgerow with 2 hedgerow trees wrapping tightly around the proposed area of hardstanding. Whilst it is recognised that this planting is intended to mitigate the otherwise adverse visual effects of parked cars within the setting of the Registered Parkland, the drawings do not make clear what landscape treatment, if any, would occur within the residual land between the proposed and existing car-parks, or to the eastern-side of the proposed car-park. Without careful consideration, these small strips of land may be left unmanaged, appearing as neglected ‘left-over’ space. If that were to occur, the detriment to the visual amenity may be as notable as the appearance of parked vehicles with no mitigation planting at all.
- It would appear that an existing telegraph pole is positioned within the area proposed as car-park. This telegraph pole would need to be repositioned to enable the car-park to function.

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Access and amenity provision:

- The consented arrangements for vehicular access would involve the removal of the temporary haul road, and reinstatement of direct access to Hill House Farm and the B&G Machining premises off the A24. The application proposes to permanently retain the existing temporary haul route southwards from the A272, providing access to the rear of Buck Barn cottages, and to Hill House Farm. Similarly, the application proposes to permanently retain the existing temporary haul route northwards from the rear of Charleston House, providing access to the B&G Machining premises. These proposals will enable direct access onto the A24 from Hill House Farm and B&G Machining.
 - The submitted Planning Statement suggests that the retained haul route could also enable a new access to the rear of Buck Barn Cottages, easing problems experienced by their residents accessing the A272 via the service station / MacDonalds which are regularly congested. However, the land to the rear of the Buck Barn Cottages falls outside of the application site boundary. Accordingly, the new access referred to will remain aspirational, rather than a proposal to be secured in relation to the current planning application
- The provision of a footpath running north-south through the estate (between the existing access track alongside the Floodgates Farm landscape and the access to the west of Buck Barn bungalows) is essentially the same in principle to that previously approved, albeit on a slightly different alignment.
- The proposed pedestrian route from the proposed car park at the south of the Floodgates Farm landscape would be along the existing access track used by motorised vehicles (providing access to the B&G Machining premises, east of Hill House Lawn).
- Just to the north-west of Charleston House, the proposed footpath deviates away from the access track, climbing up steep sides of an artificial bund, before dropping back down again to a point just north of the bund, where the pedestrian footpath would cross the access track. I am unsure what the purpose of this deviation is, or what it would achieve. Without a convincing explanation, it appears that the divergence of the footpath and access track at this point would be an unnecessary inconvenience and hazard for walkers, and it might be more appropriate to continue the approach of facilitating both vehicular and pedestrian movement along the access track a little further north from the stretch where shared-use is already proposed (i.e. the stretch between the car park at the south of the Floodgates Farm landscape, and the rear of Charleston House).
 - The submitted Traffic Statement suggests (at paragraph 5.25) that *“the internal access roads will be lightly-trafficked and designed to encourage low vehicle speeds. It is anticipated that the needs of footpath users can be prioritised where the footpath crosses or runs parallel with the proposed access road through appropriate design and/or signage”*. Whilst this statement demonstrates an intent to manage the relationship between vehicle and pedestrians, no details have been provided to confirm the volume of motorised traffic likely to use the shared use track (noting that ‘lightly-trafficked’ is rather indeterminate), or what ‘appropriate design and/or signage’ would be provided as measures to slow vehicle movements.
- Acoustic fencing is proposed broadly as previous, but on different alignments. However, an additional section is proposed alongside the newly proposed parking area. A detail of this fencing has been provided, appended to the Planning Statement (drawing number RCo201/14 Rev00, by Ramsey & Co. Landscape Architecture).
- No details have been provided of any other fencing to confirm heights, materials, colour etc, (such as Deer fencing, other estate railings or similar).
- Aside from the picnic area proposed at the top of the Buck Field ‘amphitheatre’ landform, the submitted drawings do not indicate any other similar amenity provision, whereas the consented scheme included 2 viewpoints with seating and information boards at Buck Field, and 2 viewpoints with seating and information boards at Hill House Lawn.

Issues to be addressed:

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Issues to be addressed:

Clarifications are required regarding the following:-

- All of the submitted plans showing contours of the proposed landform should be re-submitted, rectifying the anomaly relating to the 3 incomplete contour lines to the eastern side of the Buck Field area, approximately 140m north of Hill House Farm.
- The submitted sections should be extended further than the edge of the site, showing how the proposed landform would relate to the surrounding landscape.
- The submitted drawings do not indicate how the re-profiled landform would be treated, beyond those areas to be covered with native tree and shrub planting. The applicant should confirm if this treatment would be as indicated on the previously approved Restoration Plan (drawing reference MAT/KC/02-10/15407revA, by MJCA), i.e. to be sown with wildflower / grass mix, with seed sourced from Weald Meadows Initiative. If it is not, the applicant should make clear what the proposals are.
- It would be beneficial to understand the anticipated volume of motorised traffic likely to be using the shared vehicular/pedestrian use track northwards from the proposed car park at the south of the Floodgates Farm landscape, and any measures which might slow their movement as appropriate for a shared vehicular-pedestrian route (for instance, the material used to surface the track).
- Further details should be provided in relation to the proposed divergence of the footpath away from the access track to the north-west of Charleston House, including an explanation of the purpose of this divergence. Alternatively a design change should be considered in order to continue the approach of facilitating both vehicular and pedestrian movement along the access track a little further north than currently proposed.

Design changes should be considered to address the following:-

- More amenity provision along the length of the track, in a manner similar to that previously approved (i.e. 2 seating areas with information boards at Buck Field, and a further 2 at Hill House Lawn).
- The applicant should give careful consideration to the appearance of the proposed car-park, south of the Floodgates Farm landscape in relation to the existing car-park for the business premises to the south. Plans should be submitted detailing an appropriate landscape treatment, taking into account both parking areas and measures to prevent a cumulative appearance of larger car-park, and also accounting for any residual spaces between the two areas and to the east of the proposed car-park.
- Details should be provided regarding re-positioning of the telegraph pole within the area proposed as a car-park.

Landscape proposals should be submitted, demonstrating a sensitive design solution for all hard and soft landscape treatments associated with the development should be supplied preferably prior to determining a Full Planning application. These details should include:-

- Specific Hard and Soft Landscape Proposals Plan(s) showing all the various hard and soft treatments, and boundary treatments (with no exclusions), within a legend which should give sufficient level of detail and not allow any misinterpretation.

Planting Plans should show:-

- all existing vegetation to be removed or retained, and confirm methods of safeguarding that vegetation.
- planting arrangement (which may be indicated as a matrices)
- written specifications (stating cultivation and other operations associated with plant and grass establishment)
- schedules of proposed tree and shrub planting (noting species, plant sizes and proposed numbers/densities (i.e. quantities))
- details such as requirements for tree guards and staking, and tree-pit construction.

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- an implementation programme.
- Other landscape drawings should show:-
- technical information regarding all proposed hard surface treatments (including the surface treatment of the proposed footpath / re-purposed haul road / new car parking area)
 - technical information regarding all proposed site furniture (such as any seating, information boards etc)
 - technical information regarding all proposed fencing, boundary treatments and structures (such as Deer fencing, other estate railings or similar).

A landscape management plan should be submitted, including long term design objectives and a schedule of landscape maintenance for a minimum period of 10 years – *N.B. this should give comprehensive details of the maintenance operations to be undertaken, including a programme and arrangements for its implementation.*

The above clarifications should be taken into account in a new, or substantially re-written LVIA based on the 'Guidelines for Landscape and Visual Impact Assessment' 3rd Edition (Institute of Environmental Management and Assessment and The Landscape Institute, 2013). – *N.B. this should consider the potential effects of all the design and management proposals submitted, as detailed above alongside other non-landscape related design information.*

- It is important that any identified effects are measured in relation to the landscape and visual amenity offered by the consented development. I.e. the consented development should be regarded as the Baseline Conditions.
- The study should be proportional to the development being considered and the likely extent of the landscape and visual effects. Accordingly, I believe that it need not be a lengthy document.
- It is also important that the assessment should be undertaken in an objective and measurable way, and the document should 'show it's workings'. In this regard:-
 - each identified landscape or visual effect should relate to an individual landscape or visual receptor, each of which is attributed a sensitivity (which accounts for its value and its susceptibility to change)
 - the magnitudes of visual effect should make reference to the verified photowires, and also take into account the mass and verticality of the proposed vegetation over the proposed 'bare-earth' landform represented on the photowires.

Summary

The 'Knepp Castle Deer Park: Restoration Management Plan' was the catalyst for a broad vision of landscape enhancement within the estate, part of which are the proposals now under consideration, in itself having evolved from 2 previously submitted applications (notwithstanding the restoration of Knepp Mill Pond by dredging).

The first design included a distinctive 'Tor' landform feature in the north east of Knepp Park. To the disappointment of WSSC's Senior Landscape Architect at the time, these proposals were withdrawn, and the second design omitted the Tor feature. Nevertheless, the proposals for a less distinctive landform in the north east of the estate were granted consent.

The design now under consideration introduces a distinctive 'amphitheatre' landform feature in the same area as the originally proposed 'Tor' landform feature.

I believe that the principle of the proposals now under consideration would, broadly speaking, improve on the landscape and visual amenity provided by the consented development. However, lack of clarity in the submission documents causes some doubts regarding the workability of the proposals, the manner in which they would be executed, and the resultant experience of landscape and visual amenity at the human scale.

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Further details and clarifications (as outlined above) are required in order to provide the necessary assurances that any forthcoming consent would be enforceable, and would not compromise the landscape and visual amenity of the consented development.

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