

Landscape Architect Response to Planning Application

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

County Matter Application

Date 20th August 2020

Application Number WSCC/036/20

Description Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works

Address Ford Circular Technology Park, Ford Road, Ford, Arundel, BN18 0XL

Summary Response: Objection

Comments

1. The application site is located at the Ford Circular Technology Park to the west of Ford and forms part of the former Ford Airfield and lies at approx. 6m AOD. The application site is partially used as an existing waste transfer station and comprises buildings relating to this business and areas of hardstanding and former hangars. Concrete access roads connect the site to Ford Lane in the east and to Ford Airfield Industrial Estate and Rollaston Park in the west. Agricultural land lies to the north, east and west with a sewage works and market site to the south. Further south lies Rudford Industrial Estate, HMP Ford and the village of Climping. The village of Yapton lies to the west. The River Arun lies approx. 1km to the east and the English Channel approx. 2km to the south. A railway line runs east-west approx. 900m to the north of the site before diverging north, south and east to the west of Littlehampton. The wider landscape is generally flat and low-lying before rising up to the South Downs approximately 2km further north.
2. The application site is surrounded by the Ford strategic allocation (known as 'The Landings') which is due to provide at least 1,500 dwellings, school facilities, a community hub (comprising retail, commercial and community facilities) a library, healthcare facilities and sports pitch. A public exhibition was held in January 2020 at which the latest proposals for 'The Landings' were presented.
3. Context/ baseline assessment
 - i. Landscape Character;
The site lies within Chichester to Yapton Coastal Plain landscape character area (LCA) as identified in the West Sussex Landscape Character Assessment. Lower Arun Valley LCA lies immediately to the east of Ford Lane. The boundaries of other LCA lie close by to the south, north and east. Marine Character Area (MCA) 7: Selsey Bill to Seaford Head lies offshore to the south.
 - ii. Historic Landscape character;

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The site is identified as lying within the Historic Landscape Characterisation Broad Character Type 'Industry' and the Historic Landscape Characterisation Character Type 'Other Industry'

- iii. Designations;
The South Downs National Park lies approx. 2.3km to the north. There are no designated ecological sites within the immediate vicinity, the closest is Climping Beach SSSI which lies approx. 2.8km to the south. There are a number of heritage assets and conservation areas in the surrounding area, the closest being the Grade II Atherington House and New House Farmhouse and the Grade I Parish Church of St Andrew.
- iv. PROW;
Footpath 200-3 runs along the entrance road from Ford Lane and connects with other local PROW, it also forms part of the promoted 'Canal Walks' which follow the course of the former Chichester and Arundel Canal.
The Monarch's Way long-distance footpath lies approx. 4km to the north on higher ground.
- v. Common land and OAL;
The closest Registered Common Land/Open Access Land to the site is The Pond at Horsemere Green which is located approx. 1km to the south of the site.
- vi. Settlement:
Ford is a small, scattered settlement comprising a group of older buildings centred on the junction of Ford Lane and Station Road close to the Grade I listed church, small developments of post-war houses at Rodney Crescent and Nelson Row, The Ship and Anchor riverside public house and an area of park homes to the east of Ford Station
- vii. Tranquillity;
In my opinion the site is generally tranquil despite occasional traffic and train noise and some noise associated with current site use.
- viii. Visibility and Views;
Due to the flat landform and the scale of the proposed development including the stack it is likely that this will be a highly visible feature in near and middle-distant views of the site. Even where vegetation provides some screening the built form is likely to be visible above this. In more distant and elevated views including those from the South Downs or from the sea it is likely that the built form will break the horizon..

4. Relevant landscape-related planning policy;

West Sussex Waste Local Plan (April 2014)

Policy W10: Strategic Waste Allocations

Policy W11: Character

Policy W12: High Quality Developments

Policy W13: Protected Landscapes

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Arun Local Plan 2011-2031 (July 2018)

Policy LAN DM1: Protection of landscape character

Policy LAN DM2: The Setting of Arundel

Policy D SPI: Design

Policy D DM1: Aspects of form and design quality

Policy HER DM3: Conservation Areas

Policy HER DM5: Remnants of the Portsmouth and Arundel Canal

Policy ENV SPI: Natural Environment

Policy ENV DM5: Development and Biodiversity

Policy W DM3: Sustainable Urban Drainage Systems

Policy QE SPI: Quality of the environment

Policy QE DM1: Noise pollution

Policy QE DM2: Light pollution

Ford Neighbourhood Plan 2017-2031 (January 2019)

Policy EH1: Protection of trees and hedgerows

Policy EH8: Light Pollution

Policy EE10: Quality of Design of commercial buildings

A Pre-app meeting was held on 11th February

A Response to Planning Consultation Request for Scoping was issued on 17th February

A Conference call was held on 1st May to discuss proposed viewpoints

5. The submitted Landscape Design 2829-01-SK002

- 5.1. Due to the height and scale of the proposals, including the EfW and the stack, effective onsite screening is not feasible as the applicant acknowledges. In order to screen the built form effectively considerable off-site planting would be required in conjunction with 'The Landings'. The space allowed for landscape proposals even limits the opportunity for effective screening in close views.
- 5.2. Opportunities exist for much more effective screening tree-planting to be provided offsite in conjunction with 'The Landings' to mitigate the impact of views from offsite towards the EfW/WS&TF and protect the amenity of future residents. An opportunity also exists to work with the developers of 'The Landings' to ensure the proposed habitat connects via 'The Landings' to the wider landscape thus providing maximum benefits for ecology.
- 5.3. Within the parameters of the very limited space allocated for the onsite landscape proposals they do appear to be generally sound and achievable. The plan would benefit from showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context. The north point is incorrectly orientated.
- 5.4. I would wish to see scrub planting and hedgerow mixes that are better informed by the local ecology. To the bunds I would wish to see some additional native tree planting, rather than reliance solely on scrub mix. These could be concentrated towards the lower slopes to better disguise the alien landform.
- 5.5. I consider there are opportunities for additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological

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enhancement, amenity and natural shading and provide some separation and enclosure for the car parks both from the wider EfW site.

- 5.6. Consideration should be given for the long-term prospects of the off-site coniferous tree belt and suitable advance tree-planting should be proposed to ensure a continuation of screening of sensitive views from the north.
- 5.7. The inclusion of flint walls is a welcome feature although this would only be noticeable in very close views, and I would wish to see more detail of these provided. The wildlife pond is another welcome feature and marks the location of the former canal, however this will not be visible for visitors outside the site and I would wish some evidence of the former canal to be shown on the eastern boundary, as it is on the western side of the site to give context for visitors. I would wish to see details of the construction of the pond and any planting.
- 5.8. The nature trail path is a welcome feature however as it does not form part of a route leading to anywhere or form part of a circular route and as it is contained by the bund and the security fence, I cannot see it being very appealing. Greater thought should be given to this and how it might make a more appealing route for staff.
- 5.9. There are no proposals shown for the funnel-shaped piece of land to the north-west of the site and I would wish to see details of proposals for this, especially as it lies close to future housing within 'The Landings', and all land on the site, including the access roads and their verges.
- 5.10. I would wish to see the inclusion of climbers to the acoustic fence to both enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing.
- 5.11. The colour and design of the security fence is an important factor and I would wish to see a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should also be ensured that sufficient gaps are left to allow species such as hedgehogs to pass through the fence and access the newly-created habitat.
- 5.12. No details of proposed surfacing are shown beyond the area of paving around the entrance foyer and there are no details of the proposed fill for the gabions. More details of these are required.

6. The submitted Landscape Implementation and Management Plan

The submitted plan is generally sound but I would recommend a soil survey be undertaken to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals

7. The submitted Landscape and Visual Impact Assessment (LVIA)

An LVIA has been prepared by Terence O'Rourke Ltd on behalf of the developer Viridor and Grundon in support of the proposed development. The LVIA is included within the submitted Environmental Statement at Chapter 12 and supported by Technical Appendix H.

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8. Assessment methodology

The methodology setting out the way in which the LVIA has been undertaken is set out within Appendix H, with methodology for producing visualisation material set out in Chapter 12 at 12.15. These indicate the intent for the assessment work to follow the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013), published by the Landscape Institute and Institute for Environmental Management and Assessment, with visualisations prepared in accordance with 'Visual Representation of Development Proposals. Technical Guidance Note 06/19' by the Landscape Institute. Whilst it is noted that due to restrictions in place due to the Covid-19 pandemic the production of high accuracy visualisations has been affected, it is accepted that the visualisations are sufficiently accurate for the purposes of assessment. However, there are some very important and significant omissions from a number of key viewpoints that need to be addressed and these are included as Appendix B. Whilst there are not an insignificant number of visualisations requested I believe that it is proportionate considering the scale of the proposals and the potentially wide area of their landscape and visual impacts. Should more visualisations be provided once Covid-19 restrictions have eased it is expected that these would be of a greater degree of accuracy.

9. Landscape baseline

The account of landscape baseline refers to the Arun District Council (ADC) Arun Landscape Study (2006) as the most recent and fine-grained assessment of land outside the South Downs National Park and includes an assessment of landscape value and sensitivity. The submitted LVIA notes that 'the ADC assessment was prepared to assist selection of new major development areas and also omits areas of significant existing development, which skews its assessment of landscape sensitivity'. The LVIA also refers to the West Sussex Landscape Character Assessment (2003) 'to augment and inform this report's assessment of landscape value in addition to the ADC study'. The South Downs Integrated Landscape Character Assessment does not appear to have been referred to in LI3- Landscape effects on the South Downs national Park (SDNP).

9.1. I acknowledge that the strategic allocation will have a significant effect on the landscape character of the immediate area but the proposed Energy Recovery Facility and Waste Transfer Station have the potential to greatly impact the wider landscape character due to their more substantial bulk and height.

9.2. The submitted methodology refers to 5.44 of the GLVIA which states that;

- *'The value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particular landscape features, notable aesthetics, perceptual or experiential qualities and combinations of the contributors.'*

9.3. In addition at H 2.40 it states that

'Landscape designations should not be over relied upon to signify the value of landscape receptors. Other factors that can help in the identification of valued landscapes include:

- *Landscape quality (condition)*
- *Scenic quality*

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- *Rarity*
- *Representativeness*
- *Conservation interests*
- *Recreational Value*
- *Perceptual aspects including wildness and or tranquillity*
- *Associations'*

9.4. I do not consider that sufficient consideration has been given in the landscape baseline to recreational value or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are a highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees. In particular the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain (within which the site is located) as including:

- *Long views to Arundel, the Downs and to the distinctive spire of Chichester Cathedral*
- *The relatively open character of much of the area allows long views so that village church towers are important landmarks in views*

According to the West Sussex LCA, key issues highlighted with respect to the Chichester to Yapton Coastal Plain include;

- *Introduction of large scale industrial buildings and glasshouses with distribution sheds*

According to the West Sussex LCA, Landscape and Visual sensitivities on the Chichester to Yapton Coastal Plain include:

- *Key views to the South Downs... and Arundel*

The West Sussex LCA also notes in relation to the Chichester to Yapton Coastal Plain that

'Industrial buildings, for instance in the Ford and Tangmere areas, are strong suburban element. Where these occur, they create visual confusion and poor definition between town and countryside, and erode distinctive landscape character.'

9.5. Due to the considerable scale of the proposals and the location of the site towards the eastern edge of the character area it is informative to also refer to the adjacent character area Lower Arun Valley.

Key characteristics of the Lower Arun Valley include:

- *Long views of river valley towards the Chalk Downs and Arundel from the south*

Key issues highlighted with respect to the Lower Arun Valley include;

- *Loss of pastoral character of the valley*
- *Any large scale housing/commercial development*
- *Loss of long views to Arundel and the Downs*

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- 9.6. A more detailed examination of the landscape baseline may have resulted in different weighting to the sensitivity of the landscape receptors and affected the final significance.
- 9.7. The nearest landscape character area to the site within the SDNP is BI: Goodwood to Arundel Wooded Estate Downland. One of its listed key characteristics is
- *The panoramic views across the coastal plain*
- 9.8. According to the West Sussex LCA, Landscape Management/ Development Considerations specific to the Goodwood to Arundel Wooded Estate Downland include:
- *Pay particular attention to panoramic views, for example from the popular viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary.*
- 9.9. There is no consideration of the potential effects on the Seascape Assessment for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head) which includes the following key characteristic;
- *Coastal geology dominated by chalk, also forming the prominent ridgeline of the South Downs visible in views from the sea*

10. Assessment of landscape effects

As discussed above I do not consider that enough consideration has been given to some of individual elements that comprise landscape character and to the effects on key characteristics of landscape character as defined in the West Sussex Landscape Character Assessment that a development of this scale and height could have. Even allowing for the age of this assessment and that of the ADC study they are still of relevance. Where they are considered to be out of date additional surveys should be undertaken.

10.1. As GLVIA states:

- *Existing assessments must be reviewed critically as their quality may vary, some may be dated and some may not be suited to the task in hand. Before deciding to rely on information from an existing assessment a judgement should be made as to the degree to which it will be useful in informing the LVIA process. (GLVIA 5.13)*
- *Existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA – for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Fieldwork will also be required to check the applicability of the assessment throughout the study area and to refine it where necessary, for example by identifying variations in character at a more detailed scale. (GLVIA 5.15).*
- *Even where there are useful and relevant existing Landscape character Assessments and historic landscape characterisations, it is still likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or*

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surroundings. This provides the opportunity to record the specific characteristics of this more limited area, but also to analyse to what extent the site and its immediate surroundings conform to or are different from the wider Landscape Character Assessments that exist, and to pick up other characteristics that may be important in considering the effects of the proposal. (GLVIA 5.16).

- 10.2. With regard to Landscape effects on the site (L 1), I am surprised that the magnitude of effect at completion is considered to be 'medium beneficial' and the significance 'slight beneficial and not significant'. Whilst the proposed building is of a dramatic and modern design using high-quality materials of local provenance such as flint and there is proposed landscaping to the site boundaries, the scale of the proposed built form is nevertheless still very significant and potentially overbearing within the landscape character area due to its size and height. The existing buildings including the retained hangars, whilst large, have an almost agricultural appearance, not at odds with their rural location, and due to their comparatively low height and pale colouring are not obtrusive features and are often screened from view by intervening tree belts. The hangars also relate well to the site's history as an airfield. Regardless of the quality of the built form, the proposals will further erode the areas remaining rural character by introducing a large-scale industrial building with stack and occasional plume.
- 10.3. With regard to Landscape effects on the South Downs National Park (L 13) there is no acknowledgement that panoramic views are one of the key characteristics of this part of the SDNP, or any assessment of the effect that the proposals would have on these highly sensitive views.
- 10.4. It is also noted that there is apparently no consideration given in night-time landscape effects to the potential effects of plume at night, with light sources reflecting on the water droplets in vapour, and its likely contribution to eroding the rural character.
- 10.5. There is no examination at all of the potential effects on the Marine Character Areas as requested in my earlier comments.

11. Visual baseline

- 11.1. The LVIA has tested the visual envelope of the proposed development site by considering the visual baseline conditions at 36 representative viewpoints. These viewpoints have been grouped variously to represent different types of visual receptors which might be expected to have broadly similar sensitivities, for example residents within 1.5km of the site or walkers on Public Rights of Way (PROW). Assessment of the sensitivity of these visual receptors (comprising value and susceptibility to change) is given in the tables which can be found at 12-39 to 12-59. Whilst this approach is considered sound, I feel that for the sake of transparency the grouping of viewpoints would benefit from more consideration. I would wish to see visual receptors in Conservation Areas, who are considered to be highly sensitive, assessed separately rather than in combination with other less sensitive receptors. Whilst I acknowledge that the receptor value and susceptibility to change is based on the highest in the group, this is somewhat confusing.

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- 11.2. There is a lack of consideration given to the very large number of future residents, and therefore visual receptors, of The Landings who will be living in close proximity to the site with its limited onsite screening. Unless there is much more effective offsite screening proposed there is a high risk that achieving an acceptable level of visual impact for these future residents is not achievable. The applicant and the developer of The Landings need to work together to ensure both schemes are acceptable.
- 11.3. A lack of consideration has also been given to some PRoW in the immediate vicinity such as 200-3 and 363. Additional viewpoints which I would wish to see examined are listed in Appendix A.
- 11.4. Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), would benefit from being taken from nearer to the receptor, for example in the churchyard to the front of the church where there are some open views to the site, to give a better impression of the existing view.
- 11.5. For clarity the report would benefit from the inclusion of those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission.
- 11.6. It is important that a LVIA is proportionate to the development proposed and with a development of such a considerable scale as this I would wish to see greater examination of closer viewpoints. Those that I wish to see examined are included in Appendix A.

12. Assessment of visual effects

- 12.1. Some of the visual effects would, in my opinion be greater than stated, and the assessment as whole understates the magnitude of some visual effects. This may be partly due to the use of a 7-point scale which permits magnitudes to be described as low/medium, medium/high etc. However, I note that the highest magnitude given is medium-large. With a development of this considerable scale in such a flat landscape and residents/walkers at a close proximity I would anticipate some magnitudes of visual effects would be classed as high. One of the factors which contribute to the magnitude of visual effect is size/scale. A development of this scale would take up a large proportion of the view composition in viewers close to the site. This is not adequately reflected in the visualisations provided, with some key visualisations of the chosen viewpoints omitted. With this in mind I do not understand what criteria these views have met to warrant the downgrading of the magnitude of change from high to medium/high.
- 12.2. If the grouping of viewpoints to form visual receptors has resulted in this 'averaging out' of effects then I would suggest that it is more appropriate to re-examine those groupings. For example, for residents of Rodney Crescent or walkers on PRoW 200-3 close to the site I would anticipate the magnitude of visual effect would be high.
- 12.3. Whilst it is acknowledged that 'the appreciation of the design is subjective' I do not agree that the proposals may result in a 'feature of interest in a landscape that lacks

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distinctiveness'. The distinctiveness of this landscape, as discussed above, stems from its low-lying, coastal-plain character with historic villages and ancient churches set against the backdrop of the South Downs, albeit having been subject to modern housing development.

12.4. Greater consideration should be given to the impact of the proposed built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north. The addition of angled elevations and vertical elements into these wide panoramic views is likely to be particularly noticeable when seen against the rolling downs or the horizontal offing.

12.5. I would wish to see greater consideration given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact.

13. Visualisations submitted

13.1. The visualisations submitted as part of this applications (found at 12.48- 12.62) are considered very helpful in assessing the extent of the proposals. However, it is noticeable that some of the viewpoints closest to the site, where one would expect the effects to be most noticeable are lacking visualisations, specifically viewpoint 26 (Ford Lane) and Viewpoint 36 (Rodney Crescent). It is also noticeable that the visualisations do not show the plume which, although potentially visible on only approximately 25% of days, would still be a noticeable feature, and would draw attention to the built-form. The stack and plume are particular elements which would undermine the agricultural character of the landscape by introducing industrial features into views.

13.2. Of the viewpoint photographs which lack visualisations I have attached a list (at Appendix B) which indicates those which I would wish to see additional visualisations produced for in order to fully understand the visual effects of this development. Due to its considerable height it is likely to be very visible above intervening layers of vegetation and this needs to be examined.

14. Compliance with policy

West Sussex Waste Local Plan (April 2014)

14.1. As per my comments above I do not consider that the LVIA adequately assesses the impacts on the amenity of users of close public rights of way, close dwellings or future dwellings or offers sufficient mitigation or enhancement and is therefore contrary to the development principles of Policies W10.

14.2. Even in more distant views where the degree of visual intrusion may be not so great, due to the high sensitivity of these receptors the resultant impact is considered significant and contrary to Policy W10.

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- 14.3. The very limited onsite landscaping scheme submitted does not provide acceptable mitigation as required by Policy W10. It will require a significant offsite element to be considered acceptable considering the adjacent housing/mixed use allocation. There exists an opportunity for the applicants to work in conjunction with the developers of 'The Landings' to ensure that existing residents and future residents of 'The Landings' are protected from any loss of amenity through careful site planning and mitigation measures. I would wish to see this opportunity explored.
- 14.4. I consider that the proposals will have an unacceptable impact on *'the character, distinctiveness, and sense of place'* and fail to *'reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics)'* and are therefore contrary to Policy W11.
- 14.5. I consider that the proposals do not adequately *'take into account the need to: (a) integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities; (b) have regard to the local context including: (i) the varied traditions and character of the different parts of West Sussex; (ii) the characteristics of the site in terms of topography, and natural and man-made features; (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area; (iv) views into and out of the site; and (v) the use of materials and building styles,'* and are therefore contrary to Policy W12.
- 14.6. Furthermore I do not consider that the proposals accord with Policy W13: Protected Landscapes (with regard to the SDNP) and will *'undermine the objectives of the designation'* by causing significant adverse effects, as established within the submitted LVIA.

15. Conclusion

- 15.1. Due to the considerable height and size of the proposed development and its location within a low-lying and flat coastal plain landscape it is unsurprising that the impacts are found to be far-reaching and significant. The limited screening possible and proposed does little to mitigate these effects. There are a large number of sensitive landscape and visual receptors within the study area which all have the potential to be significantly and adversely impacted by the proposals including the SDNP, listed buildings and conservation areas. Visual receptors also include walkers on the many local PRow and existing and future residents of the area including the large proposed development at The Landings which surrounds the site.
- 15.2. The LVIA omits to assess the impacts on a number of key receptors and greater discussion of the method of assessing sensitivity and effects for each receptor is required. Grouping of visual receptors is also not considered helpful in some instances. The assessment of landscape effects would benefit from greater examination of all the constituent elements which comprise the landscape and its character.

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15.3. Notwithstanding my comments above, and the report's apparent lack of a conclusion of its own, the LVIA as submitted concludes that out of the 13 landscape receptors assessed 8 would be considered to experience significant adverse effects, including the highly sensitive South Downs National Park. Of the 22 visual receptors assessed 16 would be considered to experience significant adverse effects including visitors to the South Downs National Park. The proposed built form is of such a large scale and mass as to have a significant adverse impact on visual receptors both close to the site and further away and also to impact adversely landscape character over a considerable geographical area.

15.4. Due to the adverse impact on heritage assets and PRow and the lack of a comprehensive landscaping scheme which mitigates these impacts, because of the adverse impacts on the character and sense of place, the scale/form/design of the proposals being such that they will not integrate and enhance adjoining land uses, because it will adversely affect local context including landscape, skyline and views into and out of the area, and because it would undermine the objectives of nearby protected landscapes, and in particular the South Downs National Park, the proposals are contrary to the West Sussex Waste Local Plan Policies W10, W11, W12 and W13.

The terra firma Consultancy / Keith Baker for and on behalf of West Sussex County Council
(Environment & Heritage Team)

APPENDIX A

Supplementary viewpoints and visualisations requested

Description	Reason
Close PRow to north and west of site (366/ 363/ 200-2 Old Canal)/ 200-3/200-4/359) which will be within The Landings	Representative of local footpaths and future residents of The Landings
Close PRow 175 to south of site which will be within The Landings)	Representative of local footpaths and future residents of The Landings
Riverside PRow further south than VP 14	Representative of PRow users
From western side of churchyard of St Andrew's, Ford	Representative of Church visitors and PRow
Views from sea	Representative of Marine Character Area with views to South Downs

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APPENDIX B

Supplementary visualisations requested

TOR Viewpoint Number	Description	Reason
5	Poling Street	Represents mid-range views in countryside to east
6	East of Littlehampton	Represents footpath users and residents in the Arun Valley
9	Night view from Nore Folly	Day time view and visualisation requested
11	Ford Lane	Representative of close views from local roads and dwellings
13	Lyminster Conservation Area	Representative of views within Conservation Area and adjacent to Grade I listed church
16	Ford airfield	Representative of residential views on Rollaston Park new dwellings on 'The Landings'
17	North edge of Middleton on Sea	Representative of residential views towards South Downs.
19	SDNP PROW	Representative of views from lower slopes of SDNP to north of A27 where there is intervening woodland.
21	A259 Bognor	Representative of residents, PRoW and motorists crossing the open coastal plain
25	St Mary's Climping	Representative of views within Climping. To demonstrate potential screening effect of trees
26	Ford Lane	Representative of workers, motorists, local PRoW and residents of Atherington Ho etc.
30	North of Arundel Castle	Representative of views from Arundel Park within SDNP.
31 (Landings VP11)	Arundel Castle Keep	Representative of view from Grade I listed Arundel Castle. A key view for Arundel Castle and SDNPA
32 (Landings VP10)	West of Littlehampton	Representative of residents on the west of Littlehampton looking across the Arun valley

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33 (Landings VP 8)	PROW 166 south-east of Burndell/Yapton	Representative of PROW and residents
34 (Landings VP3)	Horsemere Green	Representative of effects on local residents and motorists
36	West of Rodney Crescent	Representative of neighbouring residents and PRoW