

Town and Country Planning Act 1990
The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
County Matter Application (EIA)

Date	4th May 2021
Application Number	WSSC/011/21
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

I. Comments

- I.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.
- I.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 (compromising retail, commercial and community facilities) a library, healthcare facilities and sports pitch. A masterplan (23885 Masterplan Document A25) was submitted to Arun District Council in December 2020.
- I.3. An extant permission for an Energy Recovery Facility of approx. 22m height with stack of 50m exists for this site (WSSC/096/13/F).
- I.4. 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

Landscape Architect Response to Planning Application

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**
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. **Public Right of Way (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 Open Access Land (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 twin 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.

2. Relevant landscape-related planning policy

West Sussex Waste Local Plan (April 2014)
Policy W10: Strategic Waste Allocations

Landscape Architect Response to Planning Application

Policy W11: Character
Policy W12: High Quality Developments
Policy W13: Protected Landscapes

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

3. The submitted Design and Access Statement.

- 3.1. This sets out clearly the design journey, the constraints of the site and what has been done to address these.
- 3.2. If *Fraxinus excelsior* (Ash) trees are to be planted (as proposed in 5.7) species should be selected for their resistance to *Chalara ash dieback*. If Ash is not to be included this text should be amended to correlate with the species mixes given within the Landscape Implementation and Management Plan
- 3.3. It should be noted that the vegetation to the north and east of the site boundary which is shown in accompanying visualisations is off-site and therefore not in the control of the applicant. If this vegetation is considered to form an essential part of the screening strategy, then consideration should be given to protecting them with a Tree Preservation Order or looking to ensure any future loss is mitigated by additional planting.

4. The submitted Landscape Softworks - General arrangement 2829-01-001 Rev D

- 4.1. 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. However, by orientating the built form diagonally on the site space has been provided for significant bunding in the north-east and north-west corners. In addition, by setting part of the site below ground level the apparent height of the built form is also slightly reduced, albeit by less than was anticipated, due to hydrological constraints.

Landscape Architect Response to Planning Application

- 4.2. The landscaping as shown on this plan does not appear to well reflect the 'indicative landscaping' shown on Proposed Site Plans I404 PL05, PL106 and PL107 which show many more trees. These plans should correlate.
- 4.3. In the north-east of the site there appears to be an access route under the bund which connects southwards with the road to the staff car park. More details of this are required.
- 4.4. No hard landscaping plan appears to have been submitted. Whilst I appreciate that this is a soft landscaping plan no details of proposed surfacing are shown beyond the area of feature paving in the staff car park. In addition some areas appear unhatched (for example to the south of the blue paving and west of the staff car park), although they are shown as pale grey on PL05, 6 and 7. There exists opportunity for some of these 'grey areas' to contain soft landscaping .
- 4.5. I consider there are opportunities for additional tree and shrub planting within and around the two car parking areas to provide greater ecological enhancement, amenity and natural shading and provide some separation and enclosure for the car parks from the wider EfV site.
- 4.6. Consideration should be given for the long-term prospects of the off-site coniferous tree belt to the north and suitable advance tree-planting should be proposed, in conjunction with the developer of The Landings if space cannot be found on site, to ensure a continuation of screening of sensitive views from the north until at least the proposed planting has matured.
- 4.7. The inclusion of flint walls and flint filled gabions is a welcome feature and I would wish to see more detail of these provided in due course. The wildlife pond is another welcome feature and marks the location of the former canal and I would wish to see details of the construction of the pond and any planting in due course. Marking the line of the canal across the staff car park is also a welcome feature but more consideration should be given to the choice of materials, their durability and how they will relate to the demarcation of the parking bays to avoid potential confusion.
- 4.8. If outdoor spaces are to be provided for workers, then more consideration needs to be given to their location and the experience of those using them. The space provided to the north-west appears to allow views only of the back of the workshop and the yard. If possible, views facing outwards away from the facility should also be provided, assuming that this does not overlook proposed residential properties in The Landings. The previous application included a nature trail path and it is a pity that this idea has not been carried forward to provide opportunities for informal exercise.
- 4.9. Details of the various fences are considered acceptable. It should be ensured that sufficient gaps are left to allow species such as hedgehogs to pass easily through the fence lines and access the newly-created habitats.

Landscape Architect Response to Planning Application

5. The submitted Landscape Implementation and Management Plan

- 5.1. The submitted plan is generally sound but I would recommend a contamination survey be undertaken to ensure there is no on-site contamination and to ensure the long-term success of the landscape proposals.
- 5.2. The woodland mix specified contains a wide range of species, including some not typically found in the locality, and should be reconsidered to better reflect those found locally. Similarly the native hedgerow mix needs to be better informed by the local area.
- 5.3. Specimen trees which fail within 5 years shall be replaced with stock to match the size of adjacent trees of the same species, not of the size originally specified (as stated in 6.1) to ensure a consistent height to areas of formal tree planting.

6. The submitted ES Chapter 3: Proposed Development

- 6.1. Chapter 3 of the submitted ES sets out the proposed development including lighting. It is stated at 3.48 that the *'site access and internal access roads will be illuminated during the hours of darkness to permit night time working (mainly during the winter period) as the ERF is operational 24 hours a day. The lighting proposals allow for lighting control options of photocells and time clocks.'* Further details of the lighting and its control, including controlling spill from office windows, should be provided to ensure minimal light pollution in local and distant views.
- 6.2. It is also noted that the bunds and landscaping will not be installed until the final phase of the works within the fourth year of construction until which times open views of the site and works will be visible (Figure 3.12).

7. The submitted ES Chapter 12: Landscape and Visual Impact Assessment (LVIA)

- 7.1. 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.

8. Assessment methodology

- 8.1. 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. Following a pre-application meeting additional visualisations from a number of key viewpoints have been included in the submission.

9. Landscape baseline

- 9.1. The account of the 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 is also *'augmented with some detail from'* the West Sussex Landscape Character Assessment (2003). In addition, The South Downs Landscape Character Assessment has been referred to in L13, L14, L15, L16 and L17- Landscape effects on the South Downs national Park (SDNP) and the Marine Character Areas have been referred to in relation to L18.
- 9.2. It is acknowledged that the extant permission for a smaller EfW facility granted under WSCC/096/13/F will have a significant effect on the landscape character of the immediate area if it were to be implemented but the enlarged Energy Recovery Facility and Waste Transfer Station being considered under this applications has the potential to impact a far wider landscape character due to its considerably larger bulk and height.
- 9.3. At H 2.38 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.'*
- 9.4. In addition at H 2.39 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*
 - *Rarity*
 - *Representativeness*
 - *Conservation interests*
 - *Recreational Value*
 - *Perceptual aspects including wildness and or tranquillity*
 - *Associations'*
- 9.5. The baseline assessment of landscape receptors L2 to L12 which are stated as *'taking into account both the ASDC and WSCC assessments'* (para 12.51) omits key recreational or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees.
- 9.6. Of particular relevance to L2, L4, L5, L7, L9, L11 and L12 is the West Sussex Landscape Character Assessment which highlights key characteristics of the Chichester to Yapton Coastal Plain as including:

West Sussex County Council

Landscape Architect Response to Planning Application

- *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.*

In addition 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*

and 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.'

9.7. Of relevance to L3, L6, L8, L10 which lie within the adjacent WSCC LCA: Lower Arun Valley.

Key characteristics of the adjacent 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*

9.8. A more detailed examination of the landscape baseline, which took into effect these characteristics may have resulted in different weighting to the sensitivity of the landscape receptors and affected the final significance.

9.9. The lighting proposals, as described in 12.200, state that *'light from administration building windows will be controlled through the use of blinds, so that no window lighting would be visible during the hours of darkness.'* I would wish to see further details of the mechanism used to ensure this and if the council are minded to approve this application, that this be a planning condition.

10. **Assessment of landscape effects**

10.1. As outlined 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

Landscape Architect Response to Planning Application

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.

10.2. 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 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).*

10.3. With regard to Landscape effects on the site (L 1), there appears to be no consideration given to the effect on some of the individual elements which comprise the landscape (as outlined at 10.3 above)- in particular: tranquillity, associations, and topography, all of which will be subject to change during the construction period and at completion. I disagree with the blanket statement there are 'no landscape elements within the site'. Reference should also be made to the effects on key characteristics as set out in the relevant LCA studies, such as views, and landform.

10.4. Whilst the proposed building is of a modern design using high-quality materials and there is proposed mounding and landscaping to the site boundaries, the scale of the proposed built form is nevertheless still very significant and would be overbearing within the landscape character area due to its size and height which is considerably larger than that of the existing hangars and the extant permission granted under WSCC/096/13/F. The existing buildings including the retained hangars (at approx. 16m height) whilst large, have an almost agricultural appearance, not wholly at odds with their rural location, and are often screened from view by intervening tree belts. The extant permission is for an EfW site with built form of 22m height (plus single stack at 50m) which is considerably less than the max. 38.5m height (plus twin stack at 85m) under consideration here. The hangars also reflect 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. The proposed changes in landform, whilst offering some

Landscape Architect Response to Planning Application

mitigation, will have a negative impact on the characteristically flat landscape and, in combination with the proposed built form potentially interrupt the characteristic long views to the South Downs and Arundel.

- 10.5. It is acknowledged that whilst the existing wider landscape is still largely rural in character, it is of relevance that the extant permission exists (as discussed above) and that the site sits within the allocation of 'The Landings' which will see the character change from rural to residential. Regardless of this the scale of the proposals under consideration within this application are such that they still have the potential to further impact negatively on the landscape character, especially on the surrounding area during construction phases and at completion.
- 10.6. With regard to landscape effects on L2 to L12 there appears to be no consideration of the effect that the proposals will have on the panoramic views which are key characteristics of these receptors and set out in the WSCC LCA study as outlined at 10.5 and 10.6 above.
- 10.7. With regard to Landscape effects on the South Downs National Park (L13, L14, L15, L16) there is no acknowledgement that panoramic views are one of the key characteristics of many areas of the SDNP and effects on them should be weighted accordingly. Reference should also be made to the key sensitivities of the SDNP LCA.
- 10.8. 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.
- 10.9. With regard to landscape effects on L18 (Marine Character Area 7) there is no acknowledgement that views of the South Downs are a key characteristics and effects on them should be weighted accordingly.

11. Visual baseline

- 11.1. The LVIA has tested the visual envelope of the proposed development site by considering the visual baseline conditions at 38 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 Table 12.2.

12. Assessment of visual effects

- 12.1. Some of the visual effects would, in my opinion be greater than stated, and I feel that 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 within this study 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 as one of the factors which contribute to the magnitude of visual

Landscape Architect Response to Planning Application

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. 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. Greater consideration should be given to the impact of the increased 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 vertical elements, in excess of those in the extant permission, into these wide panoramic views is likely to be particularly noticeable when seen against the rolling downs or the horizontal offing.

13. Visualisations submitted

- 13.1. The visualisations submitted as part of this applications (found at 12.56- 12.82) are considered very helpful in assessing the extent of the proposals. It is 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. Lighting of the built-form and of offices will need to also be carefully considered and controlled to minimise the impact on landscape character, views for local residents, those in the SDNP, and wildlife.

14. Submitted Planning Supporting Statement

- 14.1. This reports sets out the main elements of the planning submission and how the applicants have responded to consultee's comments on the earlier withdrawn application (WSCC/036/20).
- 14.2. Concerns were raised about the likely unacceptable landscape and visual impact of the previous proposals in particular and it is noted that this revised application has attempted to address these by a reduction in mass and height of built form, changes in materials and colour and enhanced landscaping, however the proposal are still for a very large buildings sitting within a noticeably flat landscape where it will prove to be very visible. The proposals under consideration are still much larger than those of the previously consented scheme.
- 14.3. With regard to NPPF it is considered that the proposals represent a generally '*well-designed place*' in respect of being a relatively compact and carefully considered design which attempts to minimise its visual impact as far as possible, however, this impact is still likely to be considerable during construction and at completion, as demonstrated by the submitted LVIA. Similarly whilst the landscape proposals will result in an increase in habitat locally, due to the proposed built form's mass it cannot be considered to be in accordance with the NPPF's aim of '*conserving and enhancing the natural environment*' due to its impact on the wider landscape character.

Landscape Architect Response to Planning Application

- 14.4. With regard to policy W10 of the Waste Local Plan it is considered that opportunities exist for further landscaping within the site, as outlined in Section 4 above and that existing proposals should better reflect those species found locally. Benches for staff or visitors should be carefully located to ensure that they attractive places to sit.
- 14.5. With regard to impacts on users of public rights of way, whilst it is acknowledged that opportunities for mitigation have been explored, whin the limited space available, the LVIA still predicts significant negative effects on these receptors.
- 14.6. 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. Key elements of the landscape character (as outlined in the West Sussex assessment) are the topography and long views to the South Downs and Arundel. Both of these will be impacted by the proposals.
- 14.7. It is acknowledged that the character of the surrounding area is set to change due to the large housing allocation and the extant permission which represents the EfV 'fallback position' however this will have less impact on these characteristic long views or on the flat topography that the proposals under consideration which represent a substantial increase in scale and include additional earthworks. Whilst the proposals in this submission are for arguably higher quality buildings than the other industrial buildings in the vicinity and the extant permission, and have a quality of horizontality that is welcomed, by the nature of their scale and mass they will prove to be a very dominant feature in the wider landscape. The planted earth mounds and screening may well serve to screen the lower portions of the buildings in close views but the upper parts will still be visible in close and long views and the mounds themselves are not characteristic of this flat coastal plain. Put simply, and as stated in para 7.150, *'a building of this scale cannot be lost in the local landscape'*.
- 14.8. The submitted LVIA concludes that there will be *'adverse effects on some landscape character areas and on some visual receptors, which is inevitable given the large scale of the buildings and the height of the twin flue'* (para 7.153) but that *'this must be seen in the context of the allocation of the site for the use proposed [and] the changes in local character that will result from the large strategic housing allocation'*. As discussed above, the housing allocation and extant EfV permission will undoubtedly have an impact on some elements that comprise landscape character and on some visual receptors but some elements, such as topography will remain largely intact. The impact on long views of the housing and extant EfV permission will be less than those under consideration here. In some views the housing allocation will be screened by intervening vegetation and the extant permission (excluding stack) is only 6m higher than the existing hangars whereas these proposals are for built form in excess of twice the height of the hangars and due to its large size the proposed EfV will, as has been shown by the visualisations, rise above the treeline and in many places break the horizon.
- 14.9. I consider that these proposals, although well-designed insofar as they recognise and attempt to address key constraints, and on an allocated site, 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*

Landscape Architect Response to Planning Application

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;, due to their height and mass, including lighting and plume, and effect on key landscape characteristics and are therefore contrary to Policy W12.

- 14.10. 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. As a result I disagree with the applicant's overall conclusion on compliance (at 7.362) that *'the proposals satisfy all policies of the WLP'*.

15. Conclusion

- 15.1. The site has an extant 'fallback' permission for a proposed EfW and sits within an allocated development site known as 'The Landings' however due to the considerably increased height and bulk of the proposed development under consideration, and its location within a low-lying and flat coastal plain landscape the impacts are found to be far-reaching and significant. Whilst the proposed bunding and planting does in part mitigate these effects they also are contrary to the intrinsic landscape character.
- 15.2. The LVIA omits to assess the impacts on a number of key elements that comprise landscape character (for example, tranquility, topography and views to the SDNP) and would benefit from greater examination of all the constituent elements which comprise the landscape and its character and how then contribute to sensitivity.
- 15.3. Notwithstanding my comments above, the LVIA as submitted concludes that out of the 18 landscape receptors assessed 11 would experience significant adverse effects at completion of the construction period, including the highly sensitive South Downs National Park (L17) and 10 would experience significant adverse effects within the construction period. Of the 27 visual receptors assessed 20 would be considered to experience significant adverse effects at completion including visitors to the South Downs National Park (VR12) and 17 during construction. The proposed built form, which is considerably larger than the extant permission, 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 during both construction and operational phases.
- 15.4. Due to the adverse impact on landscape character and the lack of a possibility of adequately mitigating these impacts, because of the adverse impacts on the character and sense of place, the scale 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 found to be contrary to the West Sussex Waste Local Plan Policies W11, W12 and W13.

West Sussex County Council

Landscape Architect Response to Planning Application

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