

West Sussex County Council

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 (EIA)

Date	13th September 2021
Application Number	WSCC/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

Comments in response to additional information received dated 26th July 2021 which should be read in conjunction with my previous comments dated 4th May 2021.

1. The hard landscape plan and additional information regarding soft landscaping have been received and are appreciated. I remain of the opinion that further opportunities for soft landscaping exist and if permission is granted this could be dealt with by suitably worded planning condition.
2. I am still of the opinion that these proposals will result in unacceptable landscape harm as summarised below:

Landscape character

3. With regard to the landscape baseline I do not consider that all the individual elements which comprise landscape as defined in Guidelines for Landscape and Visual Impact Assessment (3rd edition) have been adequately assessed which could result in a different weighting to sensitivity of landscape receptors and thus a greater final significance of impact.
4. I consider that the proposals will have an unacceptable impact on key aspects of the landscape character (as set out in the WSCC Landscape Character Assessment) which include long views to the South Downs and Arundel (as shown in visualisations from viewpoint 7, 8, 15, and 17). The proposals will introduce industrialising elements into this landscape which retains areas of rural character. The proposed built form, stack and plume will break the horizon of the Downs or be seen in front of it as an intrusive industrial form. The applicant appears not to have assessed the visual characteristics in the landscape assessment.
5. It is acknowledged that 'The Landings' development will change the character and sensitivity of the local surroundings but the lower height of those proposals will have a lesser impact on long

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views which are a key aspect of the character than the proposed ERF and Waste Sorting and Transfer Facility which due to its height, mass and plume will interrupt and be a prominent feature within these views and therefore adversely affect a key characteristic of the landscape character areas (LCA).

Visual effects

6. In addition to the impact on the characteristic key views which form part of landscape character (as above), the proposals will result in significant visual effects including on views from the South Downs National Park in the north. The scale of the building, the verticality of the stack and the plume will be prominent features in the flat coastal plain and will not relate to either the tower blocks of Bognor or the gasholder at Littlehampton as is suggested by the applicant but will sit between them as an isolated, industrialising landmark, in some cases with the River Arun leading the viewer's eye towards it. I disagree that by occupying a small part of the view vertical elements become 'diluted'. Because of their rarity, scale and verticality they 'catch the eye' and in fact become more noticeable.
7. Whilst the proposed built form has reduced in height from the withdrawn application it is still significantly taller and of greater bulk/mass than the consented scheme. The stacks are 35m taller with double the diameter and the building is 16.5m taller with greater mass and bulk, and unlike the previously consented scheme are significantly larger than any existing structures in the locality. As a result it will be visible over a much wider area and therefore of significant and unacceptable landscape impact.
8. The proposed bunds may offer some visual screening and softening of the lower parts of the building and operation areas in distant views but from close range they, and the associated tall fencing, will be visually dominant especially when the planting is first installed and for several years as it matures. The proposed bunds are considerably taller than those at the nearby waste-water plant and are considered an uncharacteristic land-form in the otherwise flat coastal plain. I disagree that blocks of woodland are characteristic in the area. The WSCC LCA SC9 states that there are '*occasional shelterbelts*' and the landscape is '*relatively open*'. Views of the South Downs and Arundel from the south will inevitably be interrupted and impacted by a new landform of this scale.
9. Views from the north (including those from the South Downs National Park, footpaths, and Arundel) will be adversely impacted by the presence of the proposed built form, stack and plume as illustrated in visualisations from viewpoints 4, 10, 18, 19, 24, 26, 28, 29, 31, and 37.

South Downs National Park

10. As stated above and in the applicant's LVIA the proposals will result in a significant adverse residual effects on two landscape receptors and, as noted above on visual receptors (including PROW), within the SDNP which is contrary to the purposes of the SDNP which are:

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

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

These seven special qualities* of the South Downs National Park include:

1. *Diverse, inspirational landscapes and breathtaking views*
3. *Tranquil and unspoilt places*

The proposals which result in a significant adverse effect neither conserve nor enhance the area or promote opportunities for enjoyment of the inspirational landscape and breath-taking views and tranquil and unspoilt places.

Summary

11. The applicant's LVIA anticipates a considerable number of significant adverse residual effects (both landscape and visual) from the proposed development at the vast majority of assessed receptors. Whilst I may disagree on the degree of negative impact, which in my view could be worse than stated in some cases, there is no doubt they are at least as bad as the findings of the applicants own LVIA, and which is considered an unacceptable landscape and visual impact and contrary to policies W11, W12 and W13 of the WSCC Waste Local Plan.

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

* <https://www.southdowns.gov.uk/our-history/why-are-we-a-national-park/sdnp-special-qualities/>