
From: Tim Dyer
Sent: 04 May 2018 16:13
To: Sam Dumbrell
Cc: Jane Moseley
Subject: RE: Former Wealden Brickworks - Planning Application WSCC/015/18/NH - Internal

Hi Sam,

Please find below my comments regarding WSCC/015/18/NH Former Wealden Brickworks.

Relevant Planning Permission -

WSCC/018/14/NH - Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD. Proposed Waste Transfer Facility to handle inert and non-inert waste with associated open air inert waste recycling operations, landscape improvements and vehicle parking

Existing Building. Chimney 29.5m high Ridgeline 16.5m
Permitted Building. Chimney 30.0m Ridgeline 16.5m

WSCC/062/16/NH - Former Wealden Brickworks. Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure

Proposed Building. Chimney 95m, Building Ridgeline 48.75m

Concerns raised in Regulation 22 request for clarified information or evidenced regarding; plume assessment and addition to viewpoint photomontages, heritage assessment, higher resolution plans, viewpoints, plume size and likely frequency

Outstanding issues remained regarding; specific matters in the landscape impact evidence, the scale of building compared to those based on other technologies, how the scheme draws upon the surrounding landscape context, colour study, appropriateness of site/site selection, impact upon the Land North of Horsham, spoil retention, long sections showing context and heights.

Current proposals - WSCC/015/18/NH

Proposed Building. Chimney 95m Building Ridgeline 35.92m

The changes to the design have meaningfully reduced the visual impact of the proposals by lowering the building height, creating a curved roof line and using a palette of colours that are characteristic of the area. The proposed building position, massing and height now seek

to use existing topography and surrounding trees rather than completely projecting above them. These are welcome improvement to the scheme and demonstrate iterative development of the proposals.

The development proposals include a 95m stack and it is undoubtedly this element which will now form the most visible part of the design. The main criteria for the stack are not defined by landscape and visual impact parameters however the proposal have kept it slender and of an appropriate colour.

In addition to the improvements to the scheme itself the documentation to support the application (Vol 1 Chpt 5) has been fleshed out and highlights the areas raised in our discussions (see previous application response mentioned above). The determination of likely effects is comprehensive and seems to accord with my desk and site based work.

The scale of the proposed development is such that mitigation measures to screen the development only has limited effect and this is why the design iterations of the facility itself is so important. As is identified in the report the proposals will cause adverse impacts on some receptors and resources. However the majority of the built form in the scheme now sits below the treeline from the majority of viewpoints. The stack is an exception to the above statement together with a small number of receptors that have views to the proposed building. These are identified and defined in Volume 1 Chapter 5.

Conclusion

On balance the large scale of the proposed building, in its new form, is accommodated on this site and within the majority of the landscape. The stack however would form a new element in the landscape which will be visible from the surrounding area. Weighing up the number of receptors and viewpoints that are affected by the stack, with the limited significance of effect demonstrated in the reports I conclude that, overall, it would not cause an unacceptable adverse effect.

Relevant Policies

WSCC Waste Local Plan

Strategic Objective 8: To protect and, where possible, enhance the special landscape and townscape character of West Sussex.

Strategic Objective 9: To protect the SDNP and the two AONB from unnecessary and inappropriate development.

Strategic Objective 10: To protect and, where possible, enhance the natural and historic environment and resources of the County.

Strategic Objective 11: To conserve and safeguard the County's important mineral resources.

Policy W11: Character.

Proposals for waste development will be permitted provided that they would not have an unacceptable impact on:

(a) the character, distinctiveness, and sense of place of the different areas of the County and that they reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics);

Policy W12: High Quality Developments.

Proposals for waste development will be permitted provided that they are of high quality and, where appropriate, the scale, form, and design (including landscaping) 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;
- (c) includes measures to maximise water efficiency;

8.3.6 New development should also protect and, where possible, reinforce the character of the surrounding area (see Policy W11). It should work with rather than against the characteristics of the site and of the surrounding area. It should protect existing views and create new views, and use materials and building styles which are appropriate in the local context.

Policy W13: Protected Landscapes.

(b) Proposals for waste development located outside protected landscapes will be permitted provided that they do not undermine the objectives of the designation.

Policy W15: Historic Environment.

(a) known features of historic or archaeological importance are conserved and, where possible, enhanced unless there are no alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features;

8.6.2 Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. The significance of any heritage assets should be assessed and described in a manner appropriate to their importance to enable the impact of a proposal upon the asset (and the setting of a heritage asset) to be understood. Significance derives not only from a heritage asset's physical presence but also from its setting, and that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

8.6.4 In general, proposals that adversely affect designated heritage assets, including listed buildings, scheduled monuments and registered parks and gardens should not be permitted, particularly those that would result in substantial harm to or loss of designated heritage assets of the highest significance (notably scheduled monuments, grade I and II* listed buildings, grade I and II* registered parks and gardens). In some exceptional cases, however, there may be overriding reasons, such as the achievement of substantial public benefits, that outweigh that harm or loss.

Policy W19: Public Health and Amenity.

(b) the routes and amenities of public rights of way are safeguarded, or where temporary or permanent re-routeing can be justified, replacement routes of comparable or enhanced amenity value are provided;

8.10.3 Public amenity is a general term used to describe people's reasonable expectations for enjoyment of their surroundings. It can cover a range of issues from noise, odour, and disturbance, to perceptions of the possible health effects of development.

Policy W21: Cumulative Impact.

Proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result from waste management and other sites

operating simultaneously and/or successively. Phasing agreements may be sought to co-ordinate working, thereby reducing the cumulative impact.

8.12.2 It is appropriate to consider the cumulative impact of development upon the well-being of local residents, the local economy, the local environment, and the local road network. In determining an application for a new waste management facility, therefore, account will be taken of the potential cumulative impact of waste management and other operations on the locality.

Policy map 4 - Brookhurst Wood, Horsham (Built Waste Site)

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