

TOWN AND COUNTRY PLANNING ACT 1990

SECTION 78 APPEAL

APPEAL BY: Britaniacrest Recycling Ltd

SITE: Former Wealden Brickworks, Langhurstwood Road, Horsham, RH12 4QD

PROPOSAL: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure

APP/P3800/W/18/3218965

WSSC/015/18/NH

PROOF OF EVIDENCE ON BEHALF OF THE LOCAL PLANNING AUTHORITY

WEST SUSSEX COUNTY COUNCIL

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Date: 01.10.19

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1. Experience and Qualifications

- 1.1. I am David Frank Harvey Coomes. I am a Landscape Architect, a Chartered Member of the Landscape Institute. I have a BA (Hons) Degree in Geography from Durham University and a postgraduate Diploma in Landscape Architecture. I have over 30 years of experience working as a Landscape Architect, including extensive work in both public and private sectors, in numerous high-quality schemes from master planning through to implementation and maintenance. I was resident landscape architect on site at the award winning Stockley Park for seven years continuously at the beginning of my career and have been involved with large scale prestigious schemes ever since.

- 1.2. I have acted successfully as an expert witness in planning public inquiries at Moulton and Ashford and, as leader and sole owner of EDCO Design, I am the author of all its award-winning work. I have been awarded 5 no. Civic Trust Awards for my work and am comfortable in all aspects of the discipline of landscape architecture.

2. Introduction

2.1. This appeal relates to West Sussex County Council's (the County Council's) refusal of an application for planning permission by Britaniacrest Recycling Limited (the Appellant) for a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure at the Former Wealden Brickworks, Langhurstwood Road, Horsham on 11th July 2018.

2.2. The County Council defends the appeal on the basis of Reason 2 of the original refusal:

"The development would have an unacceptable impact on landscape and the visual amenity of the area, contrary to policies W12 and W13 of the West Sussex Waste Local Plan 2014".

2.3. I provide my evidence in support of the County Council's defence of the appeal.

2.4. I have read the Landscape and Visual Impact Assessment (LVIA) by RPS dated March 2018. I have also carried out my own field study, undertaking a number of site visits between March and September 2019, covering locations within the local and more distant environs of the proposed development site. My findings are included here, and they include assessment of where this proposal will be seen from and what area it is likely to affect the landscape character of. I also assess the magnitude of the visual impacts that it would make on receptors and the magnitude of the effects that it will have on the landscape character.

2.5. I have prepared my own verified views at seven locations at the same points as RPS view numbers 14, 16, 18, 21, 24, 27 and 29. These I have found are highly similar to the views produced by RPS which has given confidence in the accuracy of the RPS views 1-29 which I have therefore taken to be accurate in their totality. I have also prepared my own night- time Verified Views from three of RPS's view locations nos: 14, 24 and 29 (**Appendix 13**), with Methodology (**Appendix 14**).

2.6. In this Proof of Evidence, I will therefore independently assess the landscape and visual baseline conditions and make my own professional assessment of the landscape and visual effects of the proposed development. I will also comment on the LVIA by RPS.

2.7. I do not seek to comment on "planning balance" issues or the interpretation and application of policy, as these are dealt with separately on behalf of the County Council in the evidence by James Neave.

2.8. My Summary Proof of Evidence is encompassed in the Summary and Conclusions section at the end of this Proof of Evidence.

2.9. I understand my duty to the inquiry. I confirm that the evidence which I have prepared is true and that the opinions expressed are my true and professional opinions.

3. Summary of Landscape Policies

3.1. I do not deal with the interpretation or application of landscape and visual policies; that is dealt with in the Proof by Mr James Neave. However, I understand the key policies relevant in considering the impact of the proposed development on landscape and visual amenity of the area are as follows:

West Sussex Waste Local Plan (April 2014):

- Policy W10: Strategic Waste Allocations
- Policy W11: Character
- Policy W12: High Quality Development
- Policy W13: Protected Landscapes

National Planning Policy Framework (2019)

National Policy Statements for Energy

National Planning Policy for Waste

Horsham Landscape Capacity Assessment (2014)

High Weald AONB Management Plan 3rd Edition (2014-2019)

4. Evaluation Methodology

- 4.1. In this Proof, I draw on the methodology for carrying out an LVIA as set out in the Landscape Institute and Institute of Environmental Management and Assessment's "Guidelines for Landscape and Visual Impact Assessment", Third Edition (Spon Press 2013), herein referred to as "GLVIA".
- 4.2. The GLVIA concentrate on the principles and process of the LVIA and do not provide a detailed or formulaic "recipe" for the assessment of likely significant effects. The aim of the GVLIA is to set high standards for the scope and content of landscape and visual assessments, and to establish certain principles that will help to achieve consistency, credibility and effectiveness in landscape and visual impact assessment. Guidance and techniques contained in the GVLIA have been found to be effective and useful in practice by landscape professionals, however they are not intended as a prescriptive set of rules, nor as an exhaustive manual of techniques. They are however the rules that we have taken as seminal and therefore the core of our approach.

Study Area:

- 4.3. The study area for the LVIA assessment by RPS is described as extending to a 20km radius from the outer edges of the site (**RPS Fig 5.7**). This is appropriate given the nature of the proposal.

Baseline:

- 4.4. Having set the study area, the next step as explained in the GVLIA, is to establish the baseline landscape and visual conditions.
- 4.5. Following on from assessment of the baseline conditions, and consistent with the usual approach when carrying out an LVIA, I will, in this report, assess the sensitivity of both the landscape and visual receptors, and then the effect of the proposed development on them.

Landscape Sensitivity:

- 4.6. As stated in GLVIA, assessing the sensitivity of the landscape involves combining: (i) judgements of its susceptibility to the type of change or the development proposed, and (ii) the value attached to it (the latter being part of the baseline assessment).
- 4.7. RPS have set out at Table 5.1 of their LVIA the definitions they have used to guide their judgement as to the sensitivity of the landscape receptors, and their susceptibility to change.
- 4.8. I prefer to adopt an approach which is slightly less prescriptive in its descriptions, and also recognises the complex relationship between the value attached to the landscape and its susceptibility to change to accommodate the proposed development (for example, a nationally valued landscape does not automatically have high susceptibility to all types of change). I therefore adopt a grid approach as follows:

Table A: Landscape Sensitivity

Susceptibility of landscape receptor to change to accommodate the proposed development	Value of the landscape receptor		
	High (Important/highly valued landscape of particularly distinctive character)	Medium (Landscape of moderately valued characteristics)	Low (Relatively degraded or low value landscape)
High (Highly susceptible to changes)	High	Medium/High	Medium
Medium (Reasonably tolerant of changes)	Medium/High	Medium	Medium/Low
Low (Tolerant of changes)	Medium	Medium/Low	Low

Landscape Magnitude of Change:

- 4.9. This step involves using professional judgement to identify the effect on the landscape, or the magnitude of the potential change to the landscape, that would result from the proposed development.
- 4.10. As stated in GLVIA, this needs to be assessed in terms of the size or scale of the effect; the geographical extent of the area influenced; and its duration and reversibility.
- 4.11. At Table 5.2 of their LVIA, RPS set out the definitions they use when assessing the scale and magnitude of change.
- 4.12. I do not agree with all the definitions used by RPS, and prefer to take a broader approach using the following criteria:

Table B: Landscape Magnitude of Impact

Magnitude Rating	Criteria
High	Significant effect (positive or negative) on the landscape
Medium	Moderate effect (positive or negative) on the landscape
Low	Minor effect (positive or negative) on the landscape
Negligible	Negligible effect (positive or negative) on the landscape

Visual Sensitivity:

4.13. As stated in GLVIA, each visual receptor is one or more human beings, i.e. the particular person or group of people likely to be affected at a specific viewpoint. Their sensitivity should be assessed in terms of both their susceptibility to change in views and visual amenity, and also the value that they attach to particular views.

4.14. When determining the sensitivity of a visual receptor, the following parameters are considered:

- Occupation/activity of the receptor;
- Expectations of the receptor;
- Degree of exposure to the view;
- Location and context of the viewpoint;
- Importance of the view.

4.15. RPS have set out at Table 5.1 of their LVIA the definitions they have used to guide their judgement as to the sensitivity of the visual receptors, and their susceptibility to change.

4.16. I do not agree with all the definitions used by RPS, and prefer to take a broader approach using the following criteria:

Table C: Visual Sensitivity

Sensitivity Rating	Criteria
High	Receptors with a high interest in/high expectation of the visual environment
Medium	Receptors with a moderate interest in/moderate expectation of the visual environment
Low	Relatively disinterested/ low expectation of the visual environment.

Magnitude of the Visual Effects:

4.17. This step involves using professional judgement to identify, for each visual receptor, the degree of alteration in the baseline view that would result from the loss/change of baseline landscape elements and the introduction of the proposed development.

4.18. For this step, I adopt the following criteria which are similar to the definitions set out at Table 5.2 of the RPS LVIA:

Table D: Visual Magnitude of Impact

Magnitude Rating	Criteria
High	Large scale changes that would alter the overall perception of the view.
Medium	Changes to a view that would be readily noticeable but would not change the overall perception of the view.
Low	Small scale visual changes that may be missed by the casual observer or receptor.
Negligible	Changes that would be barely perceptible to the naked eye.

Significance of landscape and visual effects:

- 4.19. Having assessed the sensitivity of both the landscape and the visual receptors, and the effect of the proposed development on them, the significance of these effects will then be determined by the inter-relationship of the magnitude of effect and receptor sensitivity. This represents a standard and accepted principle in the LVIA process.
- 4.20. RPS have outlined at Table 5.3 of their LVIA “the broad approach adopted to assess the level of effect, together with professional judgment”. I agree with this in principle but set out here my own table which is based on the terms I have set out above in Tables A to D:

Table E: Significance of Landscape and Visual Effects

Magnitude of potential change to receptors	Sensitivity of receptor to proposed change		
	High	Medium	Low
High	Major/Substantial	Moderate/Major	Minor/Moderate
Medium	Moderate/Major	Moderate	Minor/Moderate
Low	Minor/Moderate	Minor/Moderate	Minor
Negligible	Insignificant/Minor	Insignificant/Minor	Insignificant

- 4.21. I would also add that in assessing the significance of the visual effects of the proposal, it is relevant in my opinion to consider the likely number of current and future receptors.

5. Project Description/ Specification

5.1. The proposed development comprises a Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure at the Former Wealden Brickworks, Langhurstwood Road, Horsham.

5.2. The proposed development would comprise the following key elements:

- A main building, 170m x 107m, with a curvilinear roof up to a height of 35.9m;
- A flue stack with a diameter of 2.5m, and height 95m;
- Two sets of red aviation obstruction lights on the flue stack – one set at 1.5m below the top of the stack, ie at 93.5m high, and the other set at 52m below the top of the stack, ie at 53m high;
- The tallest part of the main building (the boiler hall at maximum height 35.92m) would also have four red medium intensity red steady aviation obstacle lights, one in each corner;
- Various other smaller buildings and structures.

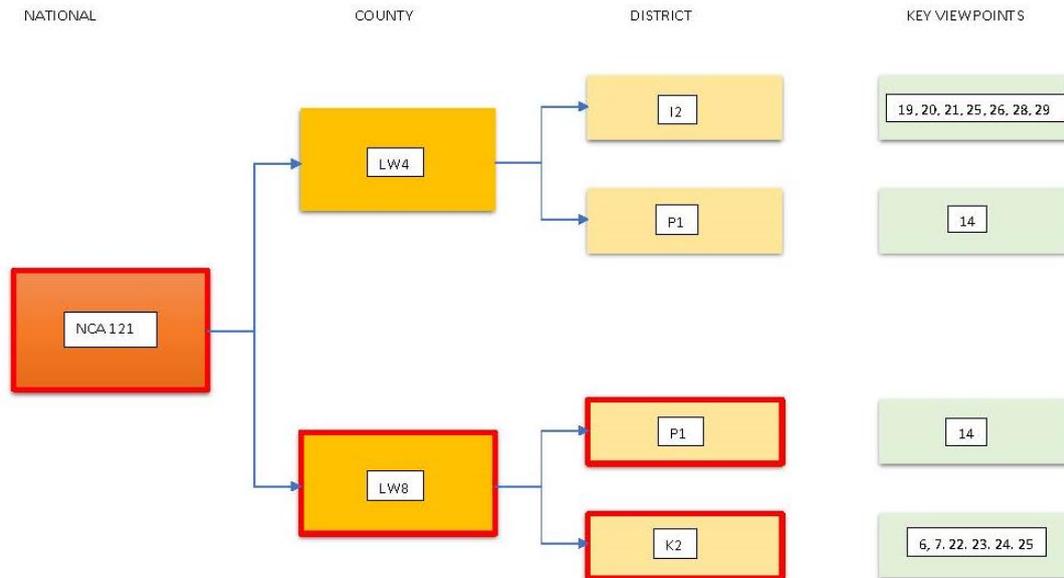
5.3. In addition, there would at times be a plume visible during the day, some 5 – 7 metres high and 30m long.

6. Landscape Baseline and Sensitivity

- 6.1. For the landscape baseline, the GVLIA state that the aim is to provide an understanding of the landscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the landscape is experienced, and the value attached to it.
- 6.2. There are seven separate criteria here. The RPS LVIA does not seem to work this required detail through.
- 6.3. When writing a landscape baseline, a good place to start is to look carefully at all relevant landscape classification assessments that the site either features within or influences. This requires analysis of LCAs at three levels: National, County and District. As GLVIA states, the LCA is the key tool for understanding landscape and should be used for baseline studies. RPS have assessed some but not all of the relevant LCAs. They have not assessed LW4 (Low Weald Hills) or I2 (Warnham and Rusper Wooded Ridge) which is a serious omission since, as outlined below, the proposed development would have a significant adverse effect in these LCAs.
- 6.4. The need to consider LCAs does not, of course, override the need to form an independent opinion regarding the baseline. Firstly, one must interpret the LCAs in the specific localised context of the site and its surroundings rather than applying broadbrush characteristics in a blanket fashion. Secondly, there may be instances where there are inaccuracies in LCAs (such as in this case, in the District level LCA P1 as described in paragraph 6.69 below). The LCAs should not therefore be taken as gospel truth without one's own professional interrogation. Indeed, it is essential that part of this would include visual assessment in the field, using I would suggest RPS's ZTV as a guide by anyone seeking to fully understand this proposal. In addition, it must be recognised that each LCA affected by this proposal must be accurately acknowledged and this becomes a lengthy process if done properly as the site immediately affects three LCAs because it is located at their intersection. To me, this location at the touching point of three LCAs is significant. Analytically, it is a complex situation as a result but once worked through it makes for a full understanding of the complexity of this subtle landscape and of its susceptibility and sensitivity to vertically dominant elements. The complexity of the LCAs is in fact a reflection of the subtle changes that occur in this landscape and therefore a reflection of its intrinsic beauty. The landscape is a gently rolling scene which calms and stimulates its receptors. It simply cannot tolerate something so brutally alien to it as the proposed stack, and this is proven by thorough examination of each LCA upon which it will intrude.
- 6.5. Furthermore, due to the extreme height of the proposal in this case, and its potential visibility between and across LCA boundaries, it is necessary to stand back and take a more holistic approach. Indeed, given that the analysis of this proposal relies on analysis of before and after views, many of which sit outside the LCAs assessed by RPS, this is implicit. The overall sense of place with which we need to be concerned in this case is one which crosses over, and is not contained within, LCA boundaries.
- 6.6. It is in my view a serious omission in the LVIA by RPS that they have not sufficiently considered the wider landscape character.
- 6.7. Firstly, they consider only the LCAs within which the site is located, with no proper reference to the relevant wider context. They state at paragraph 5.8.9 of their LVIA that "Impacts on adjacent LCAs would be indirect and limited to the visual influences of the proposals. Due to the high level of enclosure provided by both the landform and the well-wooded landscape, there would be a lack of significant effects on adjacent areas. As such, the effects of the proposed building during the operational phase upon LCAs that the site is not located in are not considered in this assessment. Similarly, the distance between the site, the AONBs and the National Park, means that no significant

effects upon these designated landscapes would occur”.

- 6.8. I fundamentally disagree with this conclusion. The key issue in this case is the visibility of the proposed 95m tall stack which will in my view adversely affect not only visual receptors but also the landscape itself in surrounding areas. One has to remember that the reason for assessing potential effects on the landscape itself is to preserve the landscape as a custodial act, to future-proof it from the point of view of future receptors, which cannot exclude consideration of views from the landscape.
- 6.9. As made clear in the GLVIA, landscape is important because it provides:
- A shared resource which is important in its own right as a public good
 - The setting for day to day lives – for living, working and recreation
 - Opportunities for aesthetic enjoyment
 - A sense of place and a sense of history, which in turn can contribute to individual, local, national and European identity
 - Continuity with the past through its relative permanence and its role in acting as a cultural record of the past
 - A source of memories and associations which in turn may contribute to wellbeing.
- 6.10. GLVIA further states a definition of sustainable development (Brundtland Report) as “development that meets the need of the present without compromising the ability of future generations to meet their own needs”. In this context, “their own needs” would in my opinion include access to and enjoyment of the countryside including views.
- 6.11. Landscape character therefore includes not only the features and other physical elements of the landscape, but also its aesthetic qualities which include its perceptual and experiential qualities. The latter in turn includes both visual and aural tranquillity.
- 6.12. It is highly relevant, therefore, when assessing the impact of a proposal on the landscape to consider how it will affect people’s experience of views from the landscape as this is part of the make-up of the aesthetic qualities of the landscape itself and therefore an important part of its base line assessment.
- 6.13. Secondly, RPS limit their analysis to reference of LCAs only, without seeming to form their own independent opinion beyond this. I disagree with this blinkered site isolation approach. In both respects, this results in an LVIA which is incomplete.
- 6.14. A further point to consider is any relevant changes likely to occur independently of the development proposal. This in turn includes information on the value attached to the different environmental resources. In this regard, the proposed residential development North of Horsham together with its proposed landscape uses are relevant. These will be of a low-rise nature which will fit well within the existing landscape and include no structure of a height anything approaching the 95m proposed here.
- 6.15. Taking the LCAs as a starting point, I set out below a chart showing the relationship between the key LCAs at National, County and District Level, as well as the key viewpoints (verified views) that fall within those LCAs. The site falls within those LCAs shown with a red border. I also refer to **Appendix 3** which shows the inter-relationship in plan of the County and District level LCAs.



National Landscape Character

National Character Area 121: Low Weald (See area shown in purple on RPS Fig 5.2) (*Appendix 3*)

6.16. The development site lies within NCA 121: Low Weald.

6.17. I summarise below the key characteristics of NCA 121 which are relevant to the area of the site and its surroundings:

- The NCA contains many sites critical for understanding of complex Wealden geology (and therefore its landform)
- Despite its proximity to London and pressure for development, the area remains essentially rural in character with small scale villages.
- There are broad, low lying, undulating clay vales with frequent north/south routes and lanes, many originating as ancient drove roads along which livestock were moved to downland grazing or forests to feed on acorns.
- This broad vale rarely exceeds more than 40m above sea level, with many areas as low as 15m.
- The resulting landscape is gently undulating with occasional steep sided stream valleys, ridges and plateaux, becoming hillier to the south as it reaches the South Downs.
- The rural character of most of the Low Weald now contrasts against modern urban centres, most notably the areas around Gatwick in the centre of the area.
- This is geologically an important area. (This is made manifest in the topographic experience of moving through the NCA).

6.18. With regard to the sensitivity of the Low Weald to the proposed development, RPS assess this as medium “due to its large scale and areas of noticeable decline, such as Gatwick, coupled with designated landscapes and some stronger characteristics”.

6.19. In my opinion, this is a meaningless analysis:

- There is no explanation as to what is meant by “large scale”, or what is the relevance of using that descriptor. A national character area may be thought of as large scale by

definition, but this is not a factor relevant in assessing sensitivity.

- RPS suggest that there is a prevalence of areas of “noticeable decline” such as Gatwick. Of course, I accept that the area includes Gatwick Airport, but I do not agree that it is characterised by “areas of noticeable decline”. It is clear from the NCA description that this is not the case – it is an area that remains essentially rural in character despite the existence of urban centres particularly around Gatwick.
- It is not clear what is meant by the following clause: “coupled with designated landscapes and some stronger characteristics”. This is too broad and unsubstantiated as to hold any meaning.

6.20. In my view, the sensitivity of the Low Weald to the proposed development is high within the area of the NCA that would be affected by the proposed development.

6.21. Although there are some urban areas and a large airport (Gatwick) within the NCA, the vast majority of the NCA, in the area potentially affected by the proposed development, is rural and free from areas of noticeable decline.

6.22. According to the NCA description, there is a typical maximum variation in altitude above AOD of 25 metres. In other words, 25 metres is the local amplitude of undulation of the topography in the area across the NCA as a whole. This, however, does not apply to the area where the proposed development site is located (within K2). Here, the variation in altitude is greater because of the fact that the Low Weald is rising up on a clearly defined escarpment which is the context of this proposal. The top of the escarpment at Graylands is between 90 – 100 AOD descending to around 50 AOD at the bottom of the escarpment on the northern edge of Horsham. Any vertical object introduced into such a key, mid escarpment, location steps on hallowed land or in terms of GLVIA has no integration with the landscape that is there. Furthermore, the views available to the public of this are exquisite showing as they do the sinuous slope sweeping down to Horsham. The essence of grandeur created at Viewpoints 21 – 26 would be irrevocably changed and deflated by this proposal. This is because the amplitude of the land is circa 50 metres and the scale of the vertical component of this proposal is getting on for double that. Relative to the baseline, such a proposal is very significantly negative in impact visually because it is totally at odds with, and out of scale with, the general roll of the land.

6.23. It is therefore a landscape of rural character with broad low-lying undulating clay vales and a prevalence of north-south views and therefore view corridors with an inherent sensitivity due to its subtle rolling character and nature.

6.24. To help illustrate this point, I refer to Viewpoint 26.

6.25. I also refer to my marked-up copy of RPS Fig 5.37 (Viewpoint 29) in **Appendix 1** attached.

6.26. This gives a flavour of the NCA in the area affected by this proposal and shows a wide expansive view looking south which is almost entirely rural and highly sensitive to the introduction of tall vertical elements. This view (Viewpoint 29) has been marked up to illustrate its sensitivity in terms of the depth of view and the layering up of horizons one on top of another which gives the receptor the relief and enjoyment of what is a long-range view. This view is large-scale, but it is large scale horizontally not vertically, and is therefore very sensitive to vertical intervention. Areas of noticeable decline are not readily visible and certainly not prevalent.

6.27. Photograph A in **Appendix 9** shows a similar picture looking north from the Public Right of Way at Tower Hill which is south of Horsham.

6.28. It can be seen from this photograph that Horsham itself is assimilated well into the landscape because it is essentially low rise and it does not threaten the horizon, perhaps other than slightly on

the right-hand side of this photograph. This creates a harmonious interface and transition between Horsham and the multiple horizons framed beautifully in the view from this location which is in the heart of suburbia where people's imagination is drawn to the countryside beyond. As is readily apparent from this photograph, the introduction of a very tall vertical structure would be wholly incongruous in the landscape which is currently devoid of such features. The landfill north of the proposal is visible in this view and has been well shaped so as not to offend the view.

National Character Area 122: (High Weald) (See area shown in green on RPS Fig 5.2) (Appendix 3)

- 6.29. NCA 122 (High Weald) is adjacent to NCA 121 (Low Weald) and lies broadly south east of the proposed development site.
- 6.30. Within NCA 122 falls the High Weald Area of Outstanding Natural Beauty (AONB) - **(See hatched area marked on RPS Fig 5.5) (Appendix 3).**
- 6.31. As stated in Natural England's National Character Area Summary for NCA 122:
- "The High Weald is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. The High Weald Area of Outstanding Natural Beauty covers 78 per cent of the NCA, reflecting the outstanding natural and scenic beauty of the landscape".
- 6.32. RPS assess the sensitivity of the High Weald AONB as high, and I agree with this.
- 6.33. I refer to **RPS Fig 5.12** Viewpoint 4, the location of which is shown on **RPS Fig 5.7**. This is a long-range view with multiple horizons and considerable visual depth. It is currently free from any vertical intrusions to which in my view it is very sensitive. This sensitivity is amplified by night in terms of the introduction of otherwise absent lighting at 93.5m high.

Warnham Court (Designated Landscape)

- 6.34. Warnham Court is a Grade II Listed Park and Garden. Viewpoint 6 (**RPS Fig 5.14**) shows the view towards the site from the public footpath at the Listed Park and Garden. I agree with RPS that the sensitivity of the Listed Park and Garden is high.

County Landscape Character

West Sussex Landscape Character Area LW8: Northern Vales (See numbered areas LW8 shown in brown on RPS Fig 5.3) (Appendix 3)

- 6.35. The site is located in LW8 which is termed the Northern Vales, an element of the Low Weald.
- 6.36. See the West Sussex Landscape Land Management Guidelines for LW8 in **Appendix 2**, on which I have marked up the location of the site of proposed development.
- 6.37. LW8 is split into two separate areas. The northern area is dominated by Gatwick Airport. The proposed development site is located in the southern area which sits adjacent to Horsham.
- 6.38. Key characteristics of the Northern Vales are listed in the LW8 Guidelines. Those which seem to me to apply to the area potentially affected by the proposed development site are:

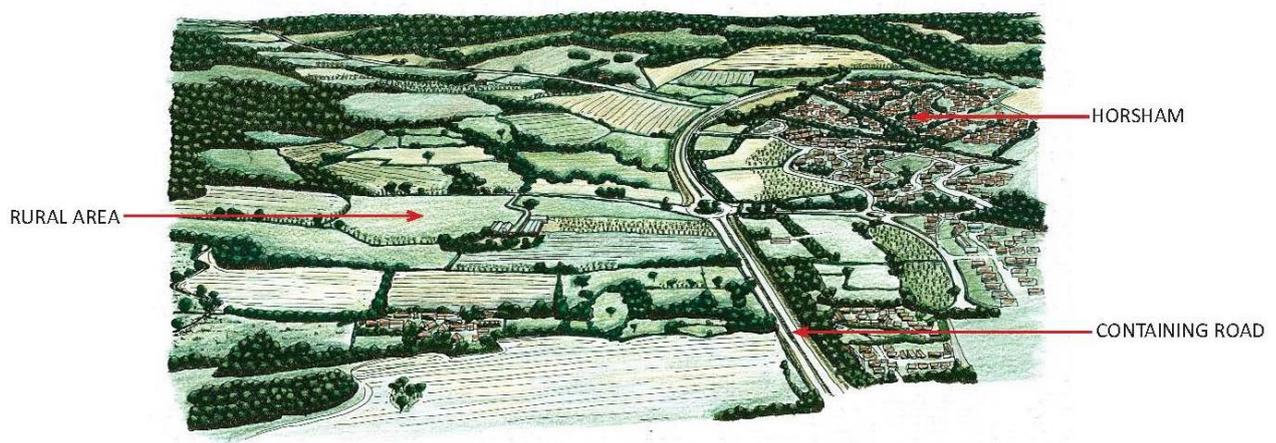
- Flat to gently undulating narrow clay vales.
- Crossed by the upper reaches of the River Arun including one of its main tributaries, Boldings Brook.
- Pattern of small, medium and large fields with a variable density of hedgerows.
- Predominantly arable farmland with smaller areas of pasture around Warnham and Faygate.
- Scattered tree cover, isolated woodlands and copses.
- Distinctive field trees and farm ponds.
- Major road and rail corridors.
- Strong suburban fringe influence of Horsham, albeit contained by the A264 road.
- Significant areas of historic parkland of Warnham Court.
- Visual intrusion in parts from sand and gravel workings.

6.39. In the LW8 Guidelines, it is stated under the heading of Landscape and Visual Sensitivity, that those parts of the Northern Vales that retain a strong rural character and the remaining woodlands, hedgerows, unimproved grasslands and historic lanes are particularly sensitive to change, with large scale development being cited as a key sensitivity.

6.40. The site of the proposed development is in that part of LW8 which retains a strong rural character and is therefore particularly sensitive to change associated with large scale development such as that proposed. Due to the height in particular of the stack, it is not possible for the hedgerows, hedgerow trees and occasional woodlands to reduce any sensitivity sufficiently.

6.41. Indeed, the LW8 Guidelines urge the conservation of the mostly rural character of the area and refer only to small scale development as being appropriate. Such small-scale development should, according to the LCA, respond to the historic settlement pattern and local design and materials which the proposed development does not.

6.42. The drawing in the LCA for LW8 is reproduced and marked up below. It provides a pictorial reference of the essence of the character of the Northern Vales and this very good picture tells a thousand words.



6.43. This picture defines how the interface between Horsham and the countryside beyond should be regarded to the benefit of both. It traces the delight of preserved rural valleys connecting into Horsham and to the expanded Horsham. Above all else, this pictorial reference does not contain any vertical element above the top of woodlands.

6.44. It is true to say that, if this was an aerial photograph of the area in which the proposed development site is located, as opposed to a picture designed to capture the essence of the place, it

would to some extent show the “industrial buildings” currently on the site of the proposed development and its immediate surroundings.

- 6.45. However, the current “industrial buildings” including the two existing chimneys/stacks are all significantly lower in height than the appeal proposal and they do not alter the overall sense that this is essentially a rural area. The landfill to the north of the proposed site is the most noticeable feature of the “industry” in this area, but it does not in my view appear as alien or intrusive. These “industrial” elements do not therefore impinge on the rural essence of the landscape character of the Northern Vales.
- 6.46. A 95m tall flue stack would, during the day and when lit at night, industrialise this sensitive composition. The proposal would be out of keeping and have a very significant negative impact on the landscape character and sense of place.
- 6.47. The first of the key change issues listed in the LW8 Guidelines is the “Visual and noise impact of Gatwick Airport”. The landscape is therefore particularly sensitive to change in this regard.
- 6.48. I believe that suspending red aviation warning lights nearly a hundred metres up in the air would suggest a spread effect of the visual impact of the airport in peoples’ minds.
- 6.49. With regard to the sensitivity of the Northern Vales (LW8) to the proposed development, RPS assess this as medium “due to the thick hedgerows, hedgerow trees and woodlands”.
- 6.50. I note that this is in line with the assessment of sensitivity as moderate in the LW8 Guidelines. However, I do not think this assessment applies to this localised part of LW8.
- 6.51. Firstly, while the sensitivity of LW8 as a whole area may be moderate, the sensitivity of the more localised part of LW8 with which we are concerned here is in my opinion high. It should be noted that while the Guidelines state that “Thick hedgerows, hedgerow trees and occasional woodlands to some extent reduce its visual sensitivity”, it then goes on to qualify this by stating: “However, those parts that retain a stronger rural character and the remaining woodlands, hedgerows, unimproved grasslands and historic lanes, are particularly sensitive to change”.
- 6.52. In my opinion, the area surrounding the proposed development site does *retain a stronger rural character*, and this in my opinion places it in a higher category of sensitivity. Further, the reference to sensitivity being reduced by thick hedgerows, hedgerow trees and woodlands does not apply here with the extreme height of the appeal proposal.
- 6.53. I would also add that RPS’s reasoning (“due to the thick hedgerows, hedgerow trees and woodlands”), is completely at odds with their own ZTV which demonstrates that the proposed building would be visible from the areas shown in yellow, and the proposed stack from the areas shown in blue “taking into account screening effects of existing vegetation (12m) and buildings (9m)”.
- 6.54. I refer to **RPS Figures 5.7 and 5.8**.
- 6.55. This is a low-lying rural undulating landscape which at ground level presents a series of subtle, high value, views, many of which have a considerable depth which would be significantly negatively affected by this proposal.
- 6.56. To help illustrate this point, I refer to the existing views from Viewpoint 6 (RPS Fig 5.14) which clearly falls within LW8 and Viewpoint 25 which appears to fall on the cusp of LW8 and LW4.
- 6.57. I, therefore, believe that the sensitivity of the Northern Vales (LW8) to the proposed development

is high.

West Sussex Landscape Character Area LW4: Low Weald Hills (See numbered area LW4 shown in light green on RPS Fig 5.3) (Appendix 3)

- 6.58. Immediately to the north of LW8 is LW4: Low Weald Hills. The Low Weald Hills are above the Northern Vales and on routes south (which are ancient drove roads). They set the stage for revealing very valuable rural views to the south.
- 6.59. See the West Sussex Landscape Land Management Guidelines for LW 4 in **Appendix 2**, on which I have marked up the location of the site of proposed development.
- 6.60. The LW4 Guidelines state that despite the relative proximity to Gatwick Airport and Crawley to the east, the area retains a strong rural character. The key characteristics of the area which are relevant to the proposed development site and its surroundings are:
- Undulating, low and densely wooded ridges running mostly east-west. Distinct escarpment to the North of Horsham and low escarpment at Rowbrook.
 - Mostly rural character with intricate patchwork of small to medium size pasture fields with a combination of sinuous and straight boundaries. Larger, more open field patterns in the east.
 - Includes the main tributaries of the River Arun; North River and Boldings Brook which meander through mostly narrow valleys with undulating valley sides, dissecting the area north to south.
 - Strong historic vernacular of sandstone, half-timber and plaster/brick, tile hanging and weatherboarding.
 - Occasional clay quarries/pits and brickworks. Notably in Kingsfold Valley.
- 6.61. The LW4 Guidelines include:
- Ensuring that any development respects historic settlement pattern and form and building materials.
 - Avoiding skyline development and ensuring any new development is well integrated into the wider landscape. Using new woodland, shaw and hedgerow planting as appropriate.
 - Paying particular attention to the siting of telecommunication masts.
- 6.62. RPS do not include any analysis of LW4 in their assessment which I believe renders their assessment incomplete.
- 6.63. The proposed site is not within LW4, but it is highly relevant to consider because the site is immediately adjacent to LW4 and views and experience of the landscape from LW4 will be affected by the proposed development, including very key views from Viewpoints 21, 26, 28 and 29. Viewpoint 25 also appears to fall on the cusp of LW4 and LW8.
- 6.64. Viewpoint 29 is a long-range view down one of the ancient drove roads heading south. This view bisects at a right angle the geology and the LCAs which are arrayed loosely in parallel in front of it. This increases its sensitivity because of the depth of the view involved which provides an important scale referencing factor for the landscape beyond. The delicate poise of scale arrayed forward in this view is highly sensitive to interruption by any object which breaks the skyline. Because of the nature of the landscape, a vertical intrusion will immediately draw the eye and reduce the beholder's appreciation of this long-range rural glimpse.
- 6.65. In my opinion, the sensitivity of the Low Weald Hills, LW4, to the proposed development is high.

This is because the high value views from LW4 in the longer distance looking south will be significantly negatively affected as well as those in the nearer distance looking south west.

District Landscape Character

- 6.66. The site itself appears to fall within Horsham District Landscape Character Areas P1 and K2 and to be immediately adjacent to I2.
- 6.67. **(See numbered areas P1 shown in pink, K2 shown in purple, and I2 shown in pale orange on RPS Fig 5.4) (Appendix 3)**

Horsham District Landscape Character Area P1: Upper Arun Valleys

- 6.68. See in **Appendix 2**, the relevant extract from the Horsham District Landscape Character Assessment (Horsham District Council, 2003) containing Landscape Character Overview, Description and Guidance for P1.
- 6.69. Note, however, that the map in the LCA for P1 appears to show P1 in the wrong location. See instead the location of the numbered area P1 shown in pink on **RPS Fig 5.4. (Appendix 3)**
- 6.70. P1 straddles LW4 in the north and LW8 in the south. This is because it is the river valley of Boldings Brook which runs from north to south.
- 6.71. The LCA for P1 sets out a number of key characteristics of the area. Those which are relevant to the site and surroundings are as follows:
- Mostly narrow valleys with undulating valley sides.
 - Lush valley bottoms with small drained irregular pastures.
 - Occasional curving strips of woodland on valley sides.
 - Tightly meandering and steeply banked river and stream courses.
 - A few widely dispersed small farms on elevated valley sides.
 - Mostly rural unspoilt character except for urban edge influence around Horsham and some road and aircraft noise in places.
- 6.72. The Overall Character is described as follows:
“The Upper Arun Valleys include the upper reaches of the Arun from Pulborough northwards to Horsham, and its main tributaries of North River and Boldings Brook. Throughout they meander through relatively narrow valleys, with gently to strongly undulating valley sides. Occasionally curving strips of woodland are a feature of the valley sides whilst seasonally flooded wet pastures occur on the valley floor. There is very little settlement apart from small scattered farmhouses, except in the north around Rookwood Park and Tower Hill. Few roads cross the rivers, although those that do are busy in nature. As a result, the area has a mostly unspoilt rural character with only limited visual and noise intrusion around Horsham”.
- 6.73. The Landscape Condition is described:
“The overall condition is good, with some local areas of decline of unspoilt character in the Horsham area”.
- 6.74. Under the heading of “Sensitivity to Change”, the LCA for P1 states:
“Overall sensitivity to change is high reflecting many landscape qualities of the area, visual

prominence of some valley sides”.

Key sensitivities relevant to the area in question are:

- Any development that would damage the integrity of the valley floors
- Any largescale development on valley sides.

6.75. Under “Planning and Landscape Management guidelines” the following points are relevant:

- Conserve the open character of the floodplain
- Ensure any small-scale development on the valley sides respects historic settlement pattern, form and building materials and is integrated into the existing landscape pattern of small woodlands and hedgerows.

6.76. I refer here to a set of photographs (at **Appendix 9**) to illustrate the landscape character of P1, moving from north to south. The photograph locations are shown on the plan at **Appendix 10**.

- Photograph B is taken from the Public Right of Way at Gunbarn Crossing, and clearly shows some of the key characteristics of P1.
- Photograph C shows a view across P1, with the existing vegetation almost completely obscuring the artificial landform of the landfill site beyond it.
- Photograph D is an example of a ghyll in P1/I2. A ghyll is the combination of landform and trees which forms a more or less unique and very signature element. The dynamic influence is the occasional erosive force of water which leaves distinct channels that are dry for much of the year. Dry valley features such as these are rare, and they form part of this very rich landscape.
- Photograph E is looking north towards the woods in which the ghyll in photograph D is to be found. The topography gently undulates down to the Boldings Brook floodplain. It illustrates the subtlety but significance of relatively shallow changes in topography which define the landscape character area, making it a landscape which is inherently sensitive and susceptible to negative impact from vertical objects of the scale proposed here which would spoil the subtlety of the composition.
- Photographs F and G. These two adjoining photographs show an unadulterated rural landscape panorama looking south from P1. The Boldings Brook stream is not visible as these photographs are on the higher surrounding ground which is part of P1. Although this land is in private ownership, these views are breath taking. These photographs show perhaps a highly valuable and partially hidden landscape resource. As the population of Horsham increases, its value will only increase. The existing chimney is just visible in Photograph F and is very well accommodated within the landscape. It sets a standard for the height to which vertical objects can be placed on this development site and be successfully assimilated into the landscape.
- Photograph H illustrates a path albeit on private land which has been worn by people connecting to P1 from Station Road.

6.77. RPS set out at paragraph 5.5.14 of their LVIA the key characteristics of P1 which they state are found at or surrounding the site. They appear to mis quote from the LCA, as I note that they exclude, crucially, the word “*unspoilt*” from the final bullet point which in the LCA actually reads as follows: “Mostly rural **unspoilt** character except for urban edge influence around Horsham and some road and aircraft noise in places”. This is a critical omission in my view because P1 is a distinct and valuable landscape in its own right which is essentially underused for passive tranquil activities and has considerable geography education value. This is a valuable landscape example that is hidden away and is a treasure. The consequences of upsetting the baseline value is unacceptable here particularly as the impact of the proposed stack will be very large in views from raised fields in P1 which are obviously inherently susceptible and sensitive to this proposal. New residents explore the countryside

and the outcome of this appeal will have an ongoing cumulative and negative visual impact.

- 6.78. The landscape is intact and unspoilt, a clearly rural and idyllic landscape that extends right up to the edge of Horsham. The adjacency of this rural landscape defines Horsham as a town nestled into the countryside, and long should it remain even though the line of the boundary between the two will change as expansion occurs. In my view, change and development can be accommodated within this ancient and defining landscape, but what must be avoided is the introduction of a highly visible industrial component as a further landscape typology.
- 6.79. With regard to the sensitivity of the Upper Arun Valleys (P1) to the proposed development, RPS assess this as medium, stating that: “The overall condition of the landscape character area is good with some local areas of unspoilt character that are in decline around the Horsham area”.
- 6.80. This appears to be based on the LCA description of the landscape condition of P1. However, I do not consider that the area affected by the proposed development is one of the areas referred to in the LCA as being in decline. In my opinion, the sensitivity of those parts of the Upper Arun Valleys (P1) that are potentially affected by the proposed development is high. This is because these areas are mostly rural and unspoilt in character and cannot absorb development of the type proposed, particularly in relation to the height of the 95m tall flue stack.

Horsham District Landscape Character Area K2: Warnham and Faygate Vale

- 6.81. See in **Appendix 2**, the relevant extract from the Horsham District Landscape Character Assessment (Horsham District Council, 2003) containing Landscape Character Overview, Description and Guidance for K2.
- 6.82. See also the location of the numbered area K2 shown in purple on **RPS Fig 5.4. (Appendix 3)**
- 6.83. Area K2 is split into two separate areas. Part of the proposed site appears to fall in the eastern area of K2.
- 6.84. K2 appears to fall within LW8.
- 6.85. The LCA for K2 sets out the key characteristics of Area K2. Those which are relevant to the site and surroundings are as follows:
- Flat to gently undulating clay vale
 - Medium to large scale field pattern of arable farmland, with smaller areas of pasture.
 - Isolated patches of woodland.
 - Semi enclosed or open character.
 - Dominance of major road and rail communication routes.
 - Significant area of historic parkland of Warnham Court.
 - Visual intrusion in parts from retail and industrial areas, housing and sand and gravel workings
- 6.86. The final bullet point appears to me to refer mainly to areas within K2 which are not relevant to this appeal. If and insofar as it refers to the existing “industrial” area of which the proposed development site is a part, this is generally very well screened and does not in my view cause significant negative visual intrusion. I have outlined my views on this in further detail below.
- 6.87. The Landscape Condition is described as:

“Condition is considered to be overall declining, locally poor, due to intensive arable agriculture, visual and noise intrusion of major traffic routes, and visual impact of industrial/retail areas in the Broadbridge Heath area”.

- 6.88. RPS assess the sensitivity of the Faygate and Warnham Vale (K2) to the proposed development as low. Their reasoning is as follows: “The condition of this LCA is considered to be declining overall. Some areas are locally poor due to intensive arable agriculture, visual and noise intrusion of major traffic routes, and visual impact of industrial/retail areas in the Broadbridge heath area”. This is virtually a copy and paste from the LCA description of the Landscape Condition which in my opinion is not appropriate in this instance.
- 6.89. Firstly, the Broadbridge Heath area is not relevant as it is towards to the south of the western section of K2 and has little or no bearing on the sense of place which requires analysis in this case. Secondly, visual and noise intrusion of major traffic routes affects only some areas but does not in my view impact negatively on the relevant sense of place.
- 6.90. In my opinion, the sensitivity is high in those parts of K2 which are in the immediate locale of the site, moving to moderate in other parts. Key sensitivities as stated in the LCA include large scale development.
- 6.91. The Guidelines in the LCA further state: “Buildings should also blend in with the landscape in scale, form, colour and design”.

I2 (Warnham and Rusper Wooded Ridge)

- 6.92. See in **Appendix 2**, the relevant extract from the Horsham District Landscape Character Assessment (Horsham District Council, 2003) containing Landscape Character Overview, Description and Guidance for I2.
- 6.93. See also the location of the numbered area I2 shown in pale orange on **RPS Fig 5.4. (Appendix 3)**
- 6.94. I2 appears to fall within LW4.
- 6.95. Area I2 is immediately adjacent to the site of the proposed development. It contains key viewpoints which would be affected by the proposed development, most significantly Viewpoints 21, 25, 26, 28 and 29.
- 6.96. RPS do not include analysis of Area I2 in their assessment, presumably because the site itself does not fall within it. This renders their assessment incomplete and flawed as Area I2 is highly relevant.
- 6.97. The LCA for I2 sets out the key characteristics of Area I2. Those which are relevant to the area in question are as follows:
- Undulating wooded ridges
 - Distinct escarpment to the north of Horsham
 - Secretive wooded ghylls
 - Strong pattern of shaws and hedgerows
 - Intricate pattern of small pasture fields
 - North to south running narrow lanes, sunken in places
 - Linear ridgetop villages and hamlets. Farms and cottages dispersed along lanes.
 - Strong historic vernacular of half-timber with plaster/brick, tile hanging and weatherboarding.

- Mostly rural character.

6.98. The Overall Character is described as follows:

“This area is characterised by dense woodland covering the low ridges of Weald Clay, with mostly small irregular fields surrounded by large and small woodlands and many shaws/hedgerows. As a result, there is a strong sense of enclosure, and views are confined, except from some ridgetops. A distinctive pattern of north to south running lanes cut across the landscape becoming narrow and sunken as they descend valley sides, with broad grassy verges and hedgerow boundaries on the ridgetop. Despite noise intrusion from Gatwick, the area retains a rural unspoilt character and the historic dispersed settlement pattern is largely intact”.

6.99. With reference to the first sentence of the above, I would point out that the fields are larger in the area of I2 that is most relevant to the proposed development, and as a result, views are less confined.

6.100. The Landscape condition is described as “mostly good”.

6.101. The LCA goes on to state that the “overall sensitivity to change is high”, with key sensitivities including vertical structure on ridge slopes.

6.102. I do not agree that Area I2 is extensively characterised by a strong sense of enclosure with confined views except from some ridgetops. Viewpoints 21, 25 and 26 show that the character of I2 in this area is not strongly enclosed with confined views. Instead, and quite to the contrary, the views from these viewpoints are open, and long range and very sensitive to vertical development. These views contain depth and multiple horizons and would be devalued by the introduction of the proposed development. The proposed chimney stack would not so much “break” the skyline as destroy it, proposed as it is at 95m tall which is a dimension completely at odds with the subtle landform which can in no way accommodate it.

6.103. To help illustrate this point, I refer to my marked-up copy of RPS Fig 5.29 (Viewpoint 21) in **Appendix 1** attached.

6.104. I also refer to Photographs I, J and K in **Appendix 9** which further illustrate key characteristics of I2, particularly the undulating wooded ridges and the existing rural character.

6.105. In my opinion, the sensitivity of the Warnham and Rusper Wooded Ridge (I2) to the proposed development is high in the area potentially affected by this development. This is because of the long-range views with depth and multiple horizons. The land slopes majestically away to the south and the subtlety of these high-quality views would be irreparably damaged by major vertical intrusions.

Horsham Landscape Capacity Assessment Character Areas

6.106. A Landscape Capacity Assessment is an analysis of the capacity an area has for employment and housing development. The site is located in Area 15 of the “Zone 1 – North Horsham to Crawley Landscape Capacity of Local Landscape Character Areas for Employment Development” map. Area 15 is the Warnham Brickworks.

6.107. This is an area which although “industrial”, is not highly visible.

6.108. The existing industry on and around the site is contained by the railway line to the west from which it is well screened. I refer to Photograph M (**Appendix 9**) which shows the view down the railway line in a southerly direction from the footbridge at Gunbarn Crossing and the screening effect of the vegetation on the left.

- 6.109. From the fields to the west of the railway line, the existing industrial buildings are also well screened due to their low-rise nature, with the chimneys being in scale with the vegetation. I refer to Photographs C, F, J and N in **Appendix 9**.
- 6.110. The existing industrial area is also contained to the east by Langhurstwood Road and is largely hidden from view due to its low-rise nature, the on and off-site vegetation, and the local topography.
- 6.111. The industrial area is also highly screened from the south. For example, I refer to the existing view from Station Road as shown on Viewpoint 17 (RPS Fig 5.25).
- 6.112. Even from the immediate approach road (Mercer Road), the existing industry is largely screened and appears of low impact in a generally green setting. See for example Photograph L in **Appendix 9**.
- 6.113. The most noticeable aspect of the existing “industry” in the area is the artificial landform created on the landfill site to the north of the proposed development site. According to plans attached to latest landfill permission ([WSCC/005/16/NH](#)) and a current (under consideration) application to vary the proposed planting from woodland to grassland ([WSCC/067/19](#)), the approved landfill contours are 100m AOD at its highest elevation (pre-settlement) and 85m AOD (post-settlement).
- 6.114. This artificial landform can be seen in some short, mid and long-range glimpses and views.
- 6.115. In the short distance, there are very occasional glimpses from Langhurstwood Road. It can also just be seen from some of the fields to the west of the railway line although it is mainly hidden from view by the existing vegetation (see Photograph C in **Appendix 9**).
- 6.116. In the mid-range, it can be seen from parts of the public right of way at Warnham Court. I refer to Photograph O (**Appendix 9**) where the landform can be seen in the middle in the background.
- 6.117. In the longer distance, the landform can be seen from the public right of way at Tower Hill to the south of Horsham. I refer to Photograph A (**Appendix 9**) where it appears in the middle of the photograph on the horizon.
- 6.118. In all these instances, the landfill landform is well assimilated into the landscape. In my opinion, it sets a height that is acceptable and shows that the introduction of any significantly taller vertical object would do considerable damage visually to the landscape in the area as a whole. The top of the proposed flue stack would be considerably higher at approximately 145m AOD (that is 95m above the approximate site level of 50m AOD).
- 6.119. Another aspect of the existing “industry” in this area is the conveyor belt which crosses over Langhurstwood Road at the northernmost end of the industrial area. The conveyor is, however, surprisingly visually inconspicuous and could easily be mistaken for a small overhead pedestrian bridge by road users to whom it appears in a relatively short visual exposure.
- 6.120. Further low-rise development within Area 15 is therefore logical and congruous but not the introduction of a 95m high stack as it will be seen from, and will adversely affect and negatively change the character of, the landscape in the surrounding area.
- 6.121. I agree with RPS that the sensitivity of Area 15 itself to the proposed development is low. However, as explained above, the development (particularly the proposed stack) will affect landscape areas far wider than simply Area 15 in isolation.

Topography

- 6.122. The drawing at **Appendix 4** shows the existing contours within the local area. It demonstrates the intense valley forms and localised hills which typify the Northern Vales.
- 6.123. It shows that the topography in the area around the site is rising up on a clearly defined escarpment which is the context of this proposal. The top of the escarpment at Graylands is between 90 – 100 AOD descending to around 50 AOD at the bottom of the escarpment on the northern edge of Horsham.
- 6.124. Any vertical object introduced into such a key, mid escarpment, location steps on hallowed land or in terms of GLVIA has no integration with the landscape that is there. Furthermore, the views available to the public of this are exquisite showing as they do the sinuous slope sweeping down to Horsham. The essence of grandeur created at Views 21 – 26 would be irrevocably changed and deflated by this proposal. This is because the amplitude of the land is circa 50 metres and the scale of the vertical component of this proposal is getting on for double that. Relative to the baseline, such a proposal is very significantly negative in impact visually because it is totally at odds with, and out of scale with, the general roll of the land.
- 6.125. This drawing also shows the landfill contours in the area to the north of the development site. Although these are high (currently approximately 100m AOD), they are, as can be seen, not out of keeping with the local topography.
- 6.126. The topography in this area is capable of absorbing low-rise development due to its undulating nature. It is, however, highly sensitive to large vertical objects which may rise above it. If this occurs, the inherent value of this topography and its ability to assimilate low rise development is devalued.
- 6.127. The contours themselves (apart from those created by the landfill site) are a result of mainly natural processes operating over tens of thousands of years to create what is a signature landscape at the foot of the Low Weald.
- 6.128. The source of the River Arun (Boldings Brook) is a valley within which the site is located, and the line of the source is discernible from the contours. Being located near the source means that the site has in my view an enhanced sensitivity and value. It is an important location in the understanding of the geology and geomorphology of the land. To locate a 95m tall stack in such a sensitive location will pierce the heart of the landscape character and its sense of place.

7. Landscape - Sensitivity

- 7.1. I have set out above and summarised in the table at **Appendix 5** my assessment of the sensitivity of the landscape receptors.
- 7.2. My assessment is shown on the table in the column coloured green. For comparison, I have shown RPS's assessment in the blue coloured column to the right.
- 7.3. The site is in my view strategically located at national, county and district levels. It is in a more or less unfettered to the eye, rural landscape which retains its identity within the domain concerned right up to the A24 and Horsham. This is because the landscape has the ability to absorb low rise development, which is sparse other than in Horsham, and still feel rural.
- 7.4. The key to the land and its sensitivity comes in the main from its topography which is unusually natural, varied and unspoilt. It is a library of natural geomorphic types which have persisted to this day and in this way its heritage value as landscape is clear. Its hitherto preserved subtlety would be obviously compromised significantly by this proposal.
- 7.5. It is also relevant to note that views affected by this proposal are in themselves so elegant and full of depth and grandeur that they have a high art value eg viewpoint 29. The slopes of the land are by any standard sculptural. This is not surprising because they have been slowly formed by fluvial erosion over the last 20,000 years and display therefore profiles which are in "steady state" in evolutionary terms. The topography and, therefore, the landscape are both resultant and resolved – nature's signature in the land.
- 7.6. At national and county level, the landscape is part of a set of experiences and views across the English countryside which are afforded as a series of events along the routes of today which are north-south and were ancient drove roads. These cross routes have and will provide humanity with a sequence of connected views between London and the sea. This sequence is part of our national heritage and it must be recognised and protected. It is a sequence that results from both the underlying variation in material strength / geology which defines the Weald coupled with 20,000 years of natural erosion from rain.
- 7.7. There is at national, county and district level, clear narrative about the character of the landscape, its constituent elements etc. The thrust is that it is a rural landscape capable of absorbing additional low-rise buildings but by definition incapable of absorbing a 95m high element due to the very reasons described in the LCAs. The narrative in the LCAs to me clearly presupposes the obvious damage done by such an out of scale proposal, it did not need specific exclusion as it is patently obvious. Such an alien element within this rural landscape would in my view bring significant negative visual impact on both human receptors and the landscape itself at all levels of LCA analysis.
- 7.8. There is also the need to protect the landscape from what might be referred to as the "creep effect" of Gatwick Airport, with the visual and noise effect of the Airport being cited as a specific key issue in the LCAs. It is the case that the noise of aircraft does reduce tranquillity as does the more damaging sound of cars. The latent threat of bad development or the spread of Gatwick is in the mind of many if not all receptors.
- 7.9. It should further be noted that there are within the domain a number of designated assets which enhance the sensitivity of the landscape. These designated assets include the moated site (scheduled monument) to the east of Langhurstwood Road and St. Mary's Church, Warnham which is a Grade I Listed Building, as well as Warnham Court which is a Grade II Listed Park and Garden.

8. Landscape – magnitude of impact of the proposed development

- 8.1. Before analysing the impact of the proposed development on the relevant Landscape Character Areas, I make the following general points:
- 8.2. The photomontages produced by RPS are day-time views. They do not show the views by night. I have produced night time verified views for Viewpoints 14, 24 and 29 (**at Appendix 11**) which I discuss in further detail below.
- 8.3. Neither do the RPS photomontages take into account the potential effect of the plume. According to RPS, the plume tends to be up to 2 - 3 times the diameter of the stack, which means 5 – 7m high, and up to a few tens of metres in length although this varies with the weather.
- 8.4. In the LVIA Appendix 5.1 Visible Plume Assessment Methodology, it is stated at paragraph 5.1.1 that *“the visible plume could increase the visual effects of the proposed development by giving the local area a more industrial appearance to visual receptors who witness it”*.
- 8.5. In addition, at paragraph 5.1.4, it states: *“The proposed development would appear as a more noticeable element in wider views from more elevated locations and the visible plume would cause views to be drawn to the development by appearing from the top of the stack due to the plume emphasising the location of the 3Rs facility. Where the proposed development is not visible, the visible plume would, on occasion, alert visual receptors of its presence despite being entirely screened from view”*.
- 8.6. I refer to **Fig 5.1.2** Modelled Plume in RPS Appendix 5.1.
- 8.7. Although the proposal would not cause any physical change to the landscape of the surrounding areas, it would in my opinion as outlined below, negatively affect its aesthetic, perceptual and experiential qualities. This is also fully described above as an integral part of the assessment of landscape baseline and sensitivity.
- 8.8. The proposed additional landscape in mitigation would not screen the stack from the surrounding landscape, even after 15 years. To borrow from the words used by the Inspector in Appeal Decision APP/M1900/V/18/3195373 [Ratty’s Lane, Hertfordshire], at paragraph 17.212, the sheer scale of the stack would loudly herald the presence of the proposed facility, undermining and materially detracting from the rural character of the surrounding landscape.
- 8.9. In terms of the impact on the LCAs, I set out my views below:

High Weald AONB

- 8.10. Viewpoint 4 (**RPS Fig 5.12**) is from the High Weald AONB, designated as such due to the outstanding natural and scenic beauty of the landscape and its history.
- 8.11. In the part of the AONB that is affected by the proposed development as shown in Viewpoint 4, the proposal will have a moderate negative impact on the landscape by day. The stack will be visible in the distance, descaling the view and reducing its apparent depth, i.e. the introduction of a vertical element 95m high will appear alien because there is no context for it within the existing view of the landscape. It will be out of scale with the balance of the view which is delicate. In addition, it will draw the eye to it and away from enjoyment of the current rural view. The viewer’s experience of the view will therefore be significantly diminished.

- 8.12. It will as a result, alter the aesthetic / perceptual aspects of the landscape by introducing an alien vertical element which draws the eye. Once the eye so drawn rests on the stack, it presents to the view almost a visual conundrum.
- 8.13. This is of particular relevance in the context of the AONB designation.
- 8.14. The High Weald Management Plan 2019-2024 (4th Edition) sets out objectives to secure the conservation and enhancement of the AONB. Of particular relevance to the proposed development are the 'Other Qualities' and 'Key Characteristics' on page 59 which include: "Scenic beauty and glimpsed long views" and "Unspoilt rural landscape with a sense of naturalness unusual in South East England."
- 8.15. Further, the corresponding 'Vision' (page 59) states: "An AONB in which people have the means to access the landscape easily and can enjoy outstanding quality multi-sensory experiences and increased contact with nature; all contributing to individual health and wellbeing and an improved sense of community, without damage to characteristic habitats and species. People's emotional engagement with the landscape generates a sense of responsibility and connection to the area leading to more sustainable lifestyles that protect and enhance natural beauty."
- 8.16. The corresponding objectives of key relevance are OQ3 (To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty) and OQ4 (To protect and promote perceptual qualities that people value). Also, of particular relevance is the 'Proposed Action' for objective OQ4 which highlights the need to "identify and protect valued views and act to reduce scenic impact of intrusive developments".
- 8.17. By night, the negative impact on the landscape will be even more significant because it will introduce an alien set of red lights into a view currently free from such elements. This will add to the apparent industrialisation of what is currently a rural view. It will also seem to create a significant and unacceptable increase in the zone of influence of Gatwick Airport which is a key LCA issue.
- 8.18. It is relevant to note in this context that the "Key Characteristics" on page 59 of the High Weald Management Plan also include: "Intrinsically dark landscapes with a sense of remoteness and tranquillity". Further, Objective OQ4 includes as a proposed action, to "Follow the Institute for Lighting Professionals Guidance; promote information on dark sky-friendly lighting; install outside lighting only when needed and use dark sky-friendly lighting".
- 8.19. I also note that AONB comments state that: "The High Weald currently enjoys some of the darkest skies in the south-east, and the illumination of the night sky remains a significant issue within and adjacent to the AONB ...".
- 8.20. The impact of the proposed development on the landscape in the area of the AONB which contains Viewpoint 4 will in my opinion be medium by day and high by night for the reasons set out above.

National Character Area 121: Low Weald

- 8.21. The impact of the proposed development on the landscape will in my opinion be high in the affected area of National Character Area 121.
- 8.22. In the area potentially affected by the proposed development, the existing landscape is essentially rural in character, and free from areas of noticeable decline. A 95m high stack would to no small degree introduce a sense of industrialisation entirely out of keeping with this essential rural landscape

which has no other vertical elements in it other than trees.

- 8.23. The complex and important Wealden geology creates a subtle varying topography, with broad low-lying undulating clay vales. There is a more than typical variation in topography in the immediate area around the proposed development site, but it remains nonetheless a landscape which is highly sensitive to tall vertical objects. It is in my view the clear implication of the LCA that these should be avoided because such vertical objects, if they challenge the natural roll of the land, and if they break the skyline, will have a significant negative effect on the landscape which in addition is more or less entirely rural up to the A24 and Horsham.
- 8.24. Another of the key characteristics of this LCA is the prevalence of north-south routes, many originating as drove roads along which livestock were moved to downland grazing or forests to feed on acorns. These north-south routes create view corridors and therefore views.
- 8.25. To help illustrate these points, I refer to my marked-up copy of RPS Fig 5.37 (Viewpoint 29) in **Appendix 1** as this view gives a flavour of the LCA at national level in the area affected by this proposal. It shows a wide expansive view looking south which is almost entirely rural and highly sensitive to the introduction of tall vertical elements. This view can be described as both “glimpsed” and long range. It should be noted that although this is not in an area of AONB, it is prudent to work to AONB guidance.
- 8.26. My mark-up of VP 29 illustrates its sensitivity in terms of the depth of view and the layering up of horizons one on top of another which gives the receptor the relief and enjoyment of what is a long-range view. This view is large-scale, but it is large scale horizontally not vertically, and is therefore very sensitive to vertical intervention. Areas of noticeable decline are not readily visible and certainly not prevalent.
- 8.27. Photograph A in **Appendix 9** shows a similar picture looking north from the Public Right of Way at Tower Hill which is south of Horsham. Horsham itself is assimilated well into the landscape because it is essentially low rise and it does not threaten the horizon, perhaps other than slightly on the right-hand side of this photograph. This creates a harmonious tree rich interface and transition between Horsham and the multiple horizons framed beautifully in the view from this location in the heart of suburbia where people’s imagination is drawn to the countryside beyond. In other words, the roll and the amplitude of the roll of the existing landscape holds Horsham well within it. As is readily apparent from this photograph, the introduction of a very tall vertical structure would be wholly incongruous in the landscape which is currently devoid of such features.
- 8.28. In summary, the introduction of a 95m tall stack would be wholly out of context with the subtle nature and scale with the landscape topography which it would overwhelm. On geologically and historically important north-south routes, it would significantly break the skyline, descaling views and causing a loss of depth in them by bringing the mid ground forward. Simultaneously, it will out compete the natural amplitude of the roll of the landscape and it will win visually so to speak.
- 8.29. This will adversely affect enjoyment and appreciation of the undulating landscape and views over it. The stack would also industrialise what is essentially a rural landscape by adding an unwelcome and incongruous element to views, with the effect made significantly worse at night as a result of the aviation warning lights high up on the stack. The key to successful development within this sensitive landscape is to stay below the horizon and below the trees. This proposal if allowed, would impose and ignore the working landscape pattern of history in this area.

Warnham Court

- 8.30. Warnham Court is a Grade II Listed Park and Garden. Viewpoint 6 (RPS Fig 5.14) shows the view towards the site from the Listed Park and Garden.
- 8.31. As a landscape receptor, the Park and Garden at Warnham Court will in my view be adversely affected by the proposal because it will detrimentally alter the character of the landscape. Although the existing chimney on the site is just visible in this view, it does not break the skyline and will in the long run be mitigated even further by tree growth. In contrast, the proposed 95m tall stack would, at least for the foreseeable future, break the skyline and significantly so. It would, therefore, introduce a highly visual industrial component into an otherwise rural setting. The impact of the proposal would in my opinion be medium by day, but high at night when the red aviation lights on the stack will significantly industrialise the view.

County LW8: Northern Vales

- 8.32. The impact of the proposed development on the landscape in the affected area of LW8 will be high in my opinion.
- 8.33. This is evident in the views from Viewpoints 6, 14, 22, 24 and 25 which are all relevant in assessing the aesthetic, perceptual and experiential qualities of the landscape.
- 8.34. The views from Viewpoints 6 (a significant area of historic parkland at Warnham Court) and 25 show the gently undulating narrow clay vales characteristic of the area. The introduction of a 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling the views.
- 8.35. In Viewpoint 25, the stack draws the eye away from a beautiful composite rural view which on a clear day stretches into the distance and whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 8.36. The area of LW8 surrounding the proposed development site is one which retains a strong rural character. This is very evident in Viewpoints 6, 22, 24 and 25. A 95m tall flue stack would, during the day and when lit at night, industrialise the views experienced from such areas and would be significantly out of keeping with the sense of place.
- 8.37. LW8 is crossed by the upper reaches of the River Arun including one of its main tributaries, Boldings Brook. The effect on this aspect of the landscape within LW8 would be highly negative as described in detail below in the context of district level LCA P1 which at its southern end falls within LW8.
- 8.38. The pattern of fields within LW8 is described as small, medium and large with a variable density of hedgerows. Within the area of LW8 surrounding the site, the fields are medium to large which makes the mid and longer range views relatively open and means that a 95m tall stack would be highly visible regardless of the density of the hedgerows which it would soar above, especially on the higher ground. This is evident in the photomontages for Viewpoints 6, 22, 24 and 25.
- 8.39. It is also evident from RPS's ZTV that the proposed stack would be very extensively visible (in the

areas shown yellow and blue) “taking into account screening effects of existing vegetation (12m) and buildings (9m)”.

8.40. The sand and gravel workings which are mentioned in LW8 are not visible to any visually assertive extent as I have explained above. In fact, they are well hidden and well-tailored to the site’s ability to accommodate elements of their scale and height. They are well embedded within the scale of the landscape and they do not therefore impinge on the rural essence of the landscape character of LW8. Their presence does not affect my view that the proposed development would have a high negative impact on the landscape character of LW8 in the area surrounding the site.

County LW4: Low Weald Hills

8.41. The impact of the proposed development on the landscape in the affected area of LW4 will be high in my opinion.

8.42. The proposed site is not within LW4, but it is highly relevant to consider because the site is immediately adjacent to LW4 and views and experience of the landscape from LW4 will be affected by the proposed development, including very key views from Viewpoints 21, 25, 26, 28 and 29.

8.43. I have described the experience of the view from Viewpoint 29 in the context of National Character Area 121 above. The same factors apply in assessing the impact of the proposed development on that part of LW8 which, like NCA 121, contains Viewpoint 29.

8.44. In summary again, this is a long-range view down one of the ancient drove roads heading south. It is on the escarpment to the north of Horsham and bisects at a right angle the geology arrayed loosely in parallel in front of it. There is considerable depth in the view providing an important scale referencing factor for the landscape beyond. The delicate poise of scale arrayed forward in this view is highly sensitive to interruption by any object which breaks the skyline. Because of the nature of the landscape, a vertical intrusion such as the proposed 95m high stack will immediately draw the eye and reduce the beholder’s appreciation of this long-range rural glimpse.

8.45. The topography, which is mainly low and undulating, is for reasons set out above, unable to assimilate very high vertical structures. The 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling views.

8.46. In all views (21, 25, 26, 28 and 29), the proposed stack would bring an unwelcome industrial feel which would be exacerbated in Viewpoint 28 where the building would also be clearly visible. The building in this view is also clumsily over-scaled and blots out part of the horizon, causing problems of scale in an otherwise perfect unspoilt rural view.

8.47. In my view, this element of industrialisation in a vista such as this would have a significant negative effect on the landscape in this area which is still rural in nature. It would also be at odds with the LW4 Guidelines which state the need to ensure that any development respects historic settlement pattern and form and building material which clearly this proposal does not.

8.48. In all of these views, the proposed stack would significantly break the skyline which is a key feature to be avoided in LW4. Likewise, the stack would not be well integrated into the wider landscape, indeed quite the opposite, which again falls foul of another key feature to be avoided in LW4. It is clear in the LW4 Guidelines that the landscape in this area is considered so sensitive to the introduction of tall vertical elements that the need to pay particular attention to the siting of telecommunications masts is specifically mentioned.

8.49. The brickworks which are mentioned in LW4 are not visible to any assertive extent as I have explained above. In fact, they are well hidden and well-tailored to the site's ability to accommodate elements of their scale and height. They are well embedded within the scale of the landscape and they do not therefore impinge on the rural essence of the landscape character of LW4. Their presence does not affect my view that the proposed development would have a high negative impact on the landscape character of LW4 in the area surrounding the site.

Horsham District Landscape Character Area P1: Upper Arun Valleys

8.50. The impact of the proposed development on the landscape in the affected parts of P1 will be high in my opinion.

8.51. The source of the River Arun (Boldings Brook) is a valley within which the site is located. Being located near the source means that the site has in my view an enhanced sensitivity and value. It is an important location in the understanding of the geology and geomorphology of the land. To locate a 95m tall stack in such a sensitive location will pierce the heart of the landscape character and its sense of place from where it is visible in the mid part of P1.

8.52. It is readily evident from the RPS ZTV that the proposed stack will be visible extensively throughout the area. This is due to the topography which cannot absorb development of the type proposed, particularly in relation to the height of the 95m tall flue stack. Although we have not independently validated this, the ZTV states that it allows for the influence of trees which is along with topography what defines the views.

8.53. The stack will be seen high above the tops of any existing (or proposed) vegetation which does not provide a screening effect in views other than those at near distance. This is especially the case on the higher ground or open elevated valley sides within P1. Although views from these areas are on private land, they are to some extent enjoyed by the public and given the proposals adjacent for the expansion of Horsham, it is highly likely that they are very valuable within the context of the imminent future so cannot be ignored.

8.54. The introduction of a 95m high stack would create a much greater industrial feel in areas that are essentially rural and unspoilt in character. This would result in a significant shift in landscape character towards the more industrial which will be exacerbated at night where there will become a spread effect of Gatwick into the previously rural landscape character.

Horsham District Landscape Character Area K2: Warnham and Faygate Vale

8.55. The impact of the proposed development on the landscape in the affected parts of K2 will be high in my opinion.

8.56. This is evident in the views from Viewpoints 6, 22, 24 and 25 which are all relevant in assessing the aesthetic, perceptual and experiential qualities of the landscape.

8.57. The views from Viewpoints 6 (a significant area of historic parkland at Warnham Court) and 25 show the gently undulating narrow clay vales characteristic of the area. The introduction of a 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling the views within views that are essentially entirely rural.

- 8.58. The area of K2 surrounding the proposed development site is one which retains a strong rural character. This is very evident in Viewpoints 6, 22, 24 and 25. Despite the effect of the noise of the A264 around the edge of Horsham, this landscape is essentially unaffected visually by it. In other words, Horsham is invisible from views within much of K2. Its rural character is not eroded by Horsham and it is wrong to suggest that it is. Horsham is in fact very well integrated within the landscape respecting as it does, the relevance of minimising vertical elements. A 95m tall flue stack would, during the day and when lit at night, industrialise the views experienced from such areas and would be significantly out of keeping with the sense of place which is rural countryside.
- 8.59. Within the area of K2 surrounding the site, the fields are medium to large which makes the mid and longer-range views relatively open and means that a 95m tall stack would be highly visible regardless of the density of the hedgerows which it would soar above. This is evident in the photomontages for Viewpoints 6, 22, 24 and 25.
- 8.60. It is also evident from RPS's ZTV that the proposed stack would be very extensively visible (in the areas shown yellow and blue) "taking into account screening effects of existing vegetation (12m) and buildings (9m)".
- 8.61. The sand and gravel workings which are mentioned in K2 are not visible to any assertive extent as I have explained above. In fact, they are well hidden and well-tailored to the site's ability to accommodate elements of their scale and height. They are well embedded within the scale of the landscape and they do not therefore impinge on the rural essence of the landscape character of K2. Their presence does not affect my view that the proposed development would have a high negative impact on the landscape character of K2 in the area surrounding the site.

I2 (Warnham and Rusper Wooded Ridge)

- 8.62. The impact of the proposed development on the landscape in the affected parts of I2 will be high in my opinion.
- 8.63. This is because of the long-range views with depth and multiple horizons (for example Viewpoints 28 and 29 which I have described in detail under NCA121 and LW4 above). To repeat, the land slopes majestically away from the escarpment top towards the south and the subtlety of these high-quality views would be irreparably damaged by the proposed 95m tall stack which would be a major vertical intrusion.
- 8.64. The effect on views from Viewpoints 21, 25 and 26 are also described under NCA121 and LW4 above. Again, to repeat, the topography is mainly low and undulating and is unable to assimilate very high vertical structures. The 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling views.
- 8.65. The proposed stack would also bring an unwelcome industrial feel which would be exacerbated in Viewpoint 28 where the building would also be clearly visible. In my view, this would have a significant negative effect on the landscape in this area which is essentially still rural in nature.
- 8.66. I have set out in the table at **Appendix 5** my assessment of the magnitude of the impact of the proposed development on the landscape receptors, using the terms: High, Medium, Low and Negligible. My assessment is shown in the column coloured green, with RPS's assessment in the blue coloured column to the right.

Horsham Landscape Capacity Assessment Character Areas

8.67. The impact of the proposed development on Area 15 will be medium in my opinion.

9. Landscape - Significance of the Impact of the proposed development

- 9.1. I have set out in the table at **Appendix 5** my assessment of the significance of the impact of the proposed development on the landscape receptors. I have adopted the Assessment Matrix at Table E above in this Proof.
- 9.2. My assessment of the significance is shown in the column coloured green, with RPS's assessment in the blue coloured column to the right.

10. Visual Baseline

- 10.1. For the visual baseline, the GLVIA state that the aim is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.
- 10.2. I refer to the ZTV (Zone of Theoretical Visibility) produced by RPS (see RPS Figs 5.7 and 5.8). This ZTV has not been tested in my work scientifically, but it is at least an indication of where the 95m tall flue stack will be seen from. Furthermore, RPS state that their ZTV takes into account the screening effects of existing vegetation and buildings. It is, therefore, an accurate “in theory” diagram to show where you could see the proposed buildings and stack from.
- 10.3. The blue areas on the ZTV, (ie where the stack will theoretically be visible from) together with the yellow areas show loosely where the boundary of negative visual impact is.
- 10.4. The photomontages show that the negative visual impact is generally within a 1km radius, extending some 1.5 km to the north (Viewpoints 28 and 29) and some 3-4 km to the south east (Viewpoint 4).
- 10.5. Having established the areas in which the development may be visible from, one then has to identify the different groups of people who may experience views of the development. As per RPS’s LVIA, this will include the following in this case:
- Residential receptors
 - People on Public Rights of Way
 - People on Roads and Railways
 - People at work
- 10.6. One can also establish the places where such different groups of people may be affected within the area in which the development may be visible from, ie the locations of the residential properties, the PRowS, the roads and railways, and the industrial and commercial premises.

Residential Receptors:

- 10.7. RPS have outlined their description of existing views from various groups of residential properties (RPS LVIA 5.5.23 – 5.5.50). The locations of these groups of properties are shown diagrammatically in blue on the plan at **Appendix 12**. RPS’s assessment of the visual impact of the proposed development on these groups of properties is set out at 5.8.11 – 5.8.24 and summarised in their Table 5.6.
- 10.8. There are no verified views available to test any opinions. However, from my own field work and observations I would add to the assessment (including assessment of impact) the following:
- Properties to the south of the access road to the Wealden Brickworks site, east of the site (Group 3)
 - RPS assessment of impact: Low to Medium
 - In my opinion, this may underestimate the visual impact of the proposed stack.
 - Properties on Mercer Road, south of the site (Group 8)
 - RPS assessment of impact: Medium
 - In my opinion, the impact may be medium or possibly higher.
 - Insofar as Viewpoint 16 is representative of views that will be experienced by these

residents, the impact on them will be medium/high in my opinion as referred to under Viewpoint 16 below.

- Properties at Andrews Farm, Station Road, west-south west of the site (Group 12)
 - RPS assessment of impact: Medium
 - In my opinion, the impact may be high. These properties are critically located in an open area, sufficiently far away from the site to gain the full negative visual impact of the stack which will read over the tops of the intervening woodland.
 - These residential receptors will also experience the view from Viewpoint 14 on a very regular basis. The impact on them at that viewpoint will be high in my opinion, for reasons set out under Viewpoint 14 below.
- Properties at Knob Hill Corner, Warnham, west-south west of the site (Group 13)
 - RPS assessment of impact: Low to medium.
 - In my opinion, the impact may be medium as these properties are at a critical distance which will make the stack clearly visible.
- Properties to the west of the A24, north of Warnham, west of the site (Group 14).
 - RPS assessment of impact: Negligible
 - In my opinion, the stack will be visible from Old Manor, and probably visible from Cider Mill Farm. It is not possible to be certain of the impact on these residential receptors, but I believe it could be medium.
- Properties on high land to the east of the A24, west-north west of the site (Group 15)
 - RPS assessment of impact: Negligible
 - In my opinion, there is likely to be a view of the stack from Cox Farm Lodge, not only from the conservatory as mentioned by RPS, but also from at least one ground floor and one first floor window, especially in winter. Such views could be of medium impact.

10.9. I also consider that the following residential receptors which are not assessed by RPS are likely to experience some adverse visual effect from the proposed development:

- Residents at Graylands will have oblique views of the stack and impact would likely be moderate.
- Residents of some properties on higher ground south of Horsham, such as those near Tower Hill are also likely to have views of the stack although it is not possible to assess the impact.

Public Rights of Way:

10.10. I do not agree with RPS's assessment of visual impact on people using the following Public Rights of Way:

- 1574-1: This follows the route along Station Road. As pedestrians walk towards the railway line, they will experience the view of the proposed buildings and stack as shown in the photomontage for Viewpoint 14 (**RPS Fig 5.22**). In my opinion, the impact on these receptors will be high, not medium, and this is for the reasons set out below under Viewpoint 14.
- 1421-2: Viewpoints 23, 24, 25 and 26 occur on this PRoW. In my opinion, the impact on receptors using this footpath would be high, not low, for the reasons set out below with regard to those viewpoints.

- 1573-1: Viewpoint 20 occurs on this PRoW. In my opinion, the impact on receptors using this footpath would be high, not negligible, for the reasons set out below with regard to Viewpoint 20.
- 1577-2: Viewpoint 6 occurs on this PRoW. In my opinion, the impact on receptors using this footpath would be high, not low, for the reasons set out below with regard to Viewpoint 6. It should also be noted that Viewpoint 7 is from the churchyard of St Mary's Church, just to the north of this PRoW. In my opinion, the impact of the proposal on receptors visiting the churchyard will be medium/high, not negligible, for the reasons set out below with regard to Viewpoint 7.

Roads and Railways:

10.11. I do not agree with RPS's assessment of the visual impact on people using the following roads:

- People travelling southbound on the A24: Viewpoint 29 occurs on the A24 travelling southbound just south of Kingsfold. I do not agree that the impact on people experiencing this view from the road is low. In my opinion, the impact will be high for the reasons set out below in relation to Viewpoint 29.
- People travelling northbound on the A24 towards the Great Daux roundabout: this is illustrated by Viewpoint 13. In my opinion, the impact on people using the road in this location will be medium, not low, for the reasons set out below under Viewpoint 13.
- People travelling east along Station Road, towards the railway line: this is illustrated by Viewpoint 14. In my opinion the impact will be high, not medium, for the reasons set out below under Viewpoint 14.

Designated Landscapes:

10.12. I discuss the effect on the High Weald AONB under Viewpoint 4 below, and the effect on Warnham Court RPaG under Viewpoint 6.

Land North of Horsham Development Area:

10.13. If the proposed development North of Horsham proceeds, then there will also be, within the foreseeable future, a further group of people who will experience views of the proposed development. For example:

- Those visiting and working at the proposed cemetery (Area 8 on the Illustrative Masterplan at **Appendix 6** herewith). Viewpoint 21 appears to be within the area proposed as a future cemetery. In my opinion, the impact on people in the cemetery will be high for the reasons set out under Viewpoint 21 below.
- Those visiting and working at the proposed allotments (Areas 9 on the Illustrative Masterplan at **Appendix 6** herewith). Viewpoint 22 appears to be within the area proposed as future allotments. In my opinion, the impact on people in the allotments will be high for the reasons set out under Viewpoint 22 below.
- Viewpoint 24 is adjacent to the area proposed for use as a primary school. In my opinion, the impact on people going to and from the school will be high for the reasons set out under Viewpoint 24 below.
- Viewpoint 3 appears to be in the area allocated for Community Uses and on a Green Way. In my opinion, the impact on people experiencing views from this location will be medium

by day and high by night for the reasons set out under Viewpoint 3 below.

- Viewpoint 23 appears to be on the new link road which is part of the proposed residential development. The orientation of this road in plan will direct future receptor views towards the proposed development as it heads in a south east to north west direction. The impact is likely to be high for the reasons set out under Viewpoint 23 below.

10.14. According to RPS's ZTV, there are significant areas within the land allocated to the North of Horsham Development which are coloured yellow or blue, meaning that both the proposed building and the proposed stack will be visible.

11. Visual Receptors - Sensitivity

- 11.1. I would agree with RPS that in principle, all the potential residential receptors and those on Public Rights of Way are of high sensitivity.
- 11.2. I do not, however, agree that people experiencing views from roads are necessarily low sensitivity. It is more complex than this.
- 11.3. Not all road users are in vehicles. Some will be cyclists, or on horseback, or pedestrians. These latter groups of people are more sensitive by definition and are more likely to be on the road for recreational purposes which again increases their sensitivity.
- 11.4. People therefore use the roads for different purposes, whatever their means of transport, which affects their sensitivity to views.
- 11.5. Taking the A24 Dorking Road for example, some people will drive along this specifically for recreational purposes, either to reach places locally, or on their way to other places which heading south may include the seaside.
- 11.6. In my opinion, people who experience the A24 travelling southbound are of medium sensitivity.
- 11.7. With regard to Station Road, those in vehicles travelling from west to east are of medium sensitivity in my opinion due to the proximity to the site, and the fact that many will be travelling towards their homes. Other users such as cyclists, those on horseback or pedestrians (including those running) are of high sensitivity.
- 11.8. With regard to other road users who will experience views at other Viewpoints assessed in this Proof, I refer to the table at **Appendix 8** where I have set out my assessment of the sensitivity of the visual receptors at these Viewpoints.
- 11.9. I agree with RPS that the sensitivity of passengers using the Dorking to Horsham railway line is medium.
- 11.10. It is difficult to quantify the totality of humanity that would see this development if it were to go ahead. However, I think the totality of humanity is neatly avoided by RPS. They give preference of course to local residents which is right. They seem to play down the impact of the proposal on public rights of way. They seek to limit I think the definition of receptors. The truth is that their own ZTV shows that this proposal will not be invisible due to existing hedgerows or woodland, and that it will in fact be highly visible and damagingly so. This is not reflected in RPS's text or their assessment of the effect and impact.
- 11.11. Furthermore, the LCAs express the perceived negativity of any apparent extension of or to, or because of, Gatwick Airport, the spread effect of which is rightly resisted.
- 11.12. This is clearly a latent human concern within the area on a county and district level. The night-time impact of this proposal is catastrophic in this regard, fouling what is clearly a sensitivity among many receptors.
- 11.13. Further, if the proposed development North of Horsham proceeds, a greater number of people will be adversely affected by the proposed development as is evident from the yellow and blue areas within the boundary of the North of Horsham development shown on RPS's ZTV.

Viewpoints

- 11.14. RPS have set out at Table 5.1 of their LVIA the definitions they have used to guide their judgement as to the sensitivity of the visual receptors, and their susceptibility to change. I take a broader approach, using Table C above in this Proof, using the terms: High, Medium, Low and Negligible.
- 11.15. I have set out in the table at **Appendix 5** my assessment of the sensitivity of the receptors at these Viewpoints. My assessment is shown in the column coloured green. For comparison, I have shown RPS's assessment in the blue coloured column to the right.

12. Visual Receptors – Magnitude of impact of the proposed development

- 12.1. At Table 5.2 of their LVIA, RPS set out the definitions they use when assessing the scale and magnitude of change that the proposed development would have on the visual receptors. In other words, the effect or impact of the proposed development on the landscape and the visual receptors. I adopt similar criteria as set out in Table D in this Proof above.
- 12.2. I have set out in the table at **Appendix 8** my assessment of the magnitude of the impact of the proposed development on the visual receptors at these Viewpoints. Again, my assessment is shown in the column coloured green, with RPS's assessment in the blue coloured column to the right.
- 12.3. I have already set out above (at paragraph 10.7 onwards) some assessment of impact on general visual receptors. I set out below my assessment of the impact of the proposed development on visual receptors at those specified viewpoints which I consider to be most relevant.

Viewpoint 3 – Public Footpath at Moathouse Farm (RPS Fig 5.11)

- 12.4. The proposed stack is clearly visible in this view in which there are no other vertical elements.
- 12.5. The impact of the proposed development would be medium by day. The proposed stack significantly breaks the skyline and draws the eye. This means that the receptor's attention is drawn to this incongruous vertical object which detracts and distracts from the current rural view. Although the stack only occupies a small proportion of the view, it changes the composition of the view by its verticality, causing a significant visual impact. The proposal will also create a significant degree of contrast with the existing landscape due to its vertical nature. Views to the stack will be full and not partial glimpses and walkers will see it for a relatively long period of time. Because it reads against the sky, there is strong contrast.
- 12.6. By night, the impact would be highly negative, there being no other similar high forms of lighting in this view.
- 12.7. It should be noted that in addition to people who currently use this public footpath, Viewpoint 3 appears to be in the area allocated for Community Uses and on a Green Way under proposals for future development North of Horsham, thereby increasing the significance of the impact on this view.

Viewpoint 4 – Public Footpath at Roffey Park (RPS Fig 5.12)

- 12.8. This is the view from within the AONB.
- 12.9. The proposed stack is visible in the middle of this view in which there are no other vertical elements.
- 12.10. The impact of the proposed development would be medium by day. The proposed stack would de-scale the view, bringing an industrial element into an otherwise rural view. It would draw the eye away from the view. This means that the receptor's attention is drawn to this incongruous vertical object which detracts and distracts from the current rural view. Although the stack only occupies a small proportion of the view, it changes the composition of the view by its verticality, causing a significant visual impact. The proposal will also create a significant degree of contrast with the existing landscape due to its vertical nature. Views to the stack will be full and not partial glimpses and walkers will see it for a relatively long period of time. Because it reads against the sky, there is strong contrast.

12.11. By night, the impact would be highly negative, there being no other similar high forms of lighting in this view.

Viewpoint 6 – Public Footpath at Warnham Court Registered Park and Garden (RPS Fig 5.14)

12.12. This view is from within the Listed Park and Gardens.

12.13. The proposed stack is visible in the middle of this view.

12.14. The impact of the proposed development would be medium/high by day. There is an existing chimney in this view, but it does not break the skyline and it will become mitigated by tree growth as time goes on. The proposal however clearly breaks the skyline and lends an industrial quality to the view. The receptor's attention is drawn to this incongruous vertical object which detracts and distracts from the current rural view. Although the stack only occupies a small proportion of the view, it changes the composition of the view by its verticality, causing a significant visual impact. The proposal will also create a significant degree of contrast with the existing landscape due to its vertical nature. Views to the stack will be full and not partial glimpses and walkers will see it for a relatively long period of time. Because it reads against the sky, there is strong contrast.

12.15. The impact at night would be high as there are no other high illuminated vertical elements in this view.

Viewpoint 7 – Churchyard of St. Margaret's Church, Warnham (RPS Fig 5.15)

12.16. The proposed stack is moderately visually apparent in the middle of this view, in which there is no other similar element. Although only a glimpsed view, the stack draws the eye and reads against the sky, providing an unwelcome focus in an otherwise unfettered rural view.

12.17. The impact of the proposed development would be medium/high by day.

12.18. The impact would be high by night as there are no other high illuminated vertical elements in this view.

12.19. It is significant that this alien and industrial intrusion will occur within the visual domain of a Grade I Listed Building which will, in my opinion, add detriment to its setting.

Viewpoint 13 – Layby on A24 northbound carriageway (RPS Fig 5.21)

12.20. The proposed buildings are visible in this view, along with the proposed stack.

12.21. The proposed buildings will provide the visual termination of this channelled view and in so doing will industrialise it. The stack is not without context but is much taller than the other vertical elements and reads much more strongly against the sky backdrop behind. It therefore shortens the depth of the view and adds to the industrial feel.

12.22. The impact of the proposed development would be medium by day. By night, the impact would be medium/high because it introduces lights up into the sky higher than any others around it.

Viewpoint 14 – Station Road/Footpath (RPS Fig 5.22)

- 12.23. The key visual issue in this view is the proposed building which appears out of scale with the landscape and feels oversized and highly industrial. The effect is much greater than that caused by the existing building which can be seen in the view because the existing building does not obstruct the horizon. In contrast, the proposed building brings forward the mid ground and wipes out the horizon, causing loss of depth in the view.
- 12.24. There is an existing chimney that can be seen currently, but the top of this is below the skyline and the view to the trees in the distance is currently preserved. The proposed building would cause loss of this significant feature, namely the views to the woodlands beyond.
- 12.25. The scale of change introduced by the proposed building is very big and the proportion of the view that is affected is large. The degree of contrast with the landscape is also high due to the bulky form scale and mass of the proposed building which is much bigger than the current building. This view will be experienced for relatively short periods of time but on a regular basis by local residents, including those at Andrews Farm which can just be seen in the photomontage behind the speed restriction sign.
- 12.26. The proposed stack is also clearly visible adding to the sense of industrialisation and reading against the sky behind. The existing chimney and stack are currently visible but the proposed stack due to its vertical height will have a much bigger impact reading against the sky and breaking the horizon along with the proposed buildings.
- 12.27. The impact of the proposed development would be high by both day and night.
- 12.28. At night, the red lights will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. The lighting of the buildings is also a new alien intrusion and contributes significantly to the feeling of industrialisation. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.
- 12.29. I refer to our verified view of this proposal by night (**Appendix 13**)

Viewpoint 16 – Entrance to Warnham Station (RPS Fig 5.24)

- 12.30. For pedestrians and residents, the impact of the proposed development would be medium by day despite the existing vertical chimney which provides some mitigation. By night the impact would be high due to the visible high red lights. For people in vehicles and people at work, the impact would be low by day and medium by night.

Viewpoint 17 – Mercer Road / Footpath (RPS Fig 5.25)

- 12.31. The impact of the proposed development would be low by day. However, it would be medium impact at night as the stack breaks the top of the trees so the red lights would be visible. The existing trees are mature so are unlikely to get much taller.

Viewpoint 19 – Southern Entrance Drive to Graylands (RPS Fig 5.27)

- 12.32. The impact of the proposed development would be high on pedestrians by day and night. The impact of the proposed development would be low on people in vehicles by day and night as the view will be behind them. Users of this entrance drive include residents of Graylands.
- 12.33. The proposed stack is very visually intrusive.
- 12.34. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.35. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.36. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.37. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.38. This is a view that will be experienced for fairly long periods of time by people walking along the drive.
- 12.39. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors’ minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 20 – Northern Entrance Drive to Graylands (RPS Fig 5.28)

- 12.40. The impact of the proposed development would be high on pedestrians and people in vehicles by day and night.
- 12.41. The proposed stack is very visually intrusive.
- 12.42. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.43. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.44. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.

- 12.45. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.46. This is a view that will be experienced for fairly long periods of time by people walking along the drive.
- 12.47. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 21 – Field South of Graylands (RPS Fig 5.29)

- 12.48. The impact of the proposed development would be high by day and night.
- 12.49. The proposed stack is very visually intrusive.
- 12.50. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.51. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.52. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.53. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.54. This is a view that will be experienced for fairly long periods of time by people at the proposed cemetery in the future.
- 12.55. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 22 – Field East of Moated Site (Close to land proposed as allotments within Land North of Horsham Development) (RPS Fig 5.30)

- 12.56. The impact of the proposed development would be high by day and night.
- 12.57. The proposed stack is very visually intrusive.
- 12.58. There are no other vertical references in this view. The proposed stack is completely unintegrated

with the landscape and it breaks the skyline.

- 12.59. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.60. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.61. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.62. This is a view that will be experienced for fairly long periods of time by people using the proposed allotments in the future.
- 12.63. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors’ minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.
- 12.64. It should also be noted that on this beautiful sweeping slope and on the left in this view, is the moated site scheduled monument, hidden by woodland. It is significant that the alien and industrial intrusion that the proposed stack will cause will occur within the visual domain of this monument. It will, in my opinion, add detriment to its setting.

Viewpoint 23 – Public Footpath (RPS Fig 5.31)

- 12.65. The impact of the proposed development would be high by day and night.
- 12.66. The proposed stack is very visually intrusive.
- 12.67. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.68. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.69. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.70. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.71. This is a view that will be experienced not at a glimpse but for fairly long periods of time as people walk along the public right of way.

12.72. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

12.73. It should be noted that in addition to people who currently use this public footpath, Viewpoint 23 appears to be on the line of the new link road which is part of the proposed residential development North of Horsham. The orientation of this road in plan will direct future receptor views towards the proposed development as it heads in a south east to north west direction. This increases the significance of the impact of the proposed development on this view.

Viewpoint 24 – Public Footpath (a green way, adjacent to proposed school site) (RPS Fig 5.32)

12.74. The impact of the proposed development would be high by day and night.

12.75. The proposed stack is very visually intrusive.

12.76. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.

12.77. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.

12.78. The proposed stack draws the eye away from a beautiful composite rural view whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it "descales" the view and creates visually problems of scale and depth interpretation.

12.79. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.

12.80. This is a view that will be experienced not at a glimpse but for fairly long periods of time as people walk along the public right of way.

12.81. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

12.82. I refer to our verified view of this proposal by night (**Appendix 13**).

12.83. It should also be noted that in addition to people who currently use this public footpath, Viewpoint 24 is located adjacent to the site proposed as a primary school as part of the future residential development North of Horsham. This increases the significance of the impact of the proposed development on this view.

Viewpoint 25 – Public Footpath (RPS Fig 5.33)

- 12.84. The impact of the proposed development would be high by day and night.
- 12.85. The proposed stack is very visually intrusive.
- 12.86. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.87. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.88. The proposed stack draws the eye away from a beautiful composite rural view which on a clear day stretches into the distance and whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.89. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.
- 12.90. This is a view that will be experienced not at a glimpse but for fairly long periods of time as people walk along the public right of way.
- 12.91. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors’ minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 26 – Public Footpath (RPS Fig 5.34)

- 12.92. The impact of the proposed development would be high by day and night.
- 12.93. The proposed stack is very visually intrusive.
- 12.94. There are no other vertical references in this view. The proposed stack is completely unintegrated with the landscape and it breaks the skyline.
- 12.95. It creates a high degree of contrast as it reads very clearly against the sky behind, and it is completely out of scale with the roll of the land.
- 12.96. The proposed stack draws the eye away from a beautiful composite rural view which on a clear day stretches into the distance and whose vertical objects are only trees. The introduction of the stack does great damage in this view because having grabbed the eye of the viewer, it then competes with and confuses the scale and size of the trees in the foreground. It presents a difficulty for the eye to resolve and it confuses and to large extent prevents the foreground from connecting to the distance. In this sense, it “descales” the view and creates visually problems of scale and depth interpretation.
- 12.97. Further, the proposed stack introduces an unwelcome alien element into an otherwise rural view.

12.98. This is a view that will be experienced not at a glimpse but for fairly long periods of time as people walk along the public right of way.

12.99. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 28 – Public Footpath (RPS Fig 5.36)

12.100. The impact of the proposed development would be high by day and night. By day, the proposed stack descales the view, introducing an alien industrial element into an otherwise rural view. Further, the mass of the proposed building, which is highly visible, would also partially block views to the "blue" horizon. It further dominates and undermines the mid ground of this view.

12.101. This is a long-range view in which there is considerable depth providing an important scale referencing factor for the landscape beyond. The delicate poise of scale arrayed forward in this view is highly sensitive to interruption by any object which breaks the skyline. Because of the nature of the landscape, a vertical intrusion such as the proposed 95m high stack will immediately draw the eye and reduce the beholder's appreciation of this long-range rural view which will be experienced by people walking along the PRoW.

12.102. The 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling views.

12.103. By night, the red aviation lights on the stack will cause high negative impact. They would be an alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

Viewpoint 29 – View from A24 (RPS Fig 5.37)

12.104. The impact of the proposed development would be high by day and night. By day, it descales the view, drawing the eye away from the view, introducing an alien industrial element into an otherwise rural view.

12.105. This is a long-range view in which there is considerable depth providing an important scale referencing factor for the landscape beyond. The delicate poise of scale arrayed forward in this view is highly sensitive to interruption by any object which breaks the skyline. Because of the nature of the landscape, a vertical intrusion such as the proposed 95m high stack will immediately draw the eye and reduce the beholder's appreciation of this long-range rural glimpse.

12.106. The topography which is mainly low and undulating is unable to assimilate very high vertical structures. The 95m tall stack would be wholly out of context with the subtle nature and scale of the landscape topography, breaking the skyline, removing the depth of and descaling views.

12.107. By night, the red aviation lights on the stack will cause high negative impact. They would be an

alien imposition within a rural landscape. These red lights suspended high in the air will draw the attention of the receptors, industrialising the night-time view. These suspended red lights at the height that they are proposed, will also raise questions in the minds of the receptors as to what they are. This will fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs.

12.108. I refer to our verified view of this proposal by night (**Appendix 29**)

12.109. In addition to the Viewpoints assessed above, I would add that in Viewpoints 1, 9 and 12, the red lights on the stack will be visible at night.

12.110. I note that RPS are producing further viewpoints in their evidence. I reserve the right to comment on these further viewpoints once I have seen them.

13. Visual Receptors - Significance of the Impact of the proposed development

- 13.1. I have set out in the table at **Appendix 8** my assessment of the significance of the impact of the proposed development on the visual receptors at these Viewpoints. I have adopted the Assessment Matrix at Table E above in this Proof.
- 13.2. Again, my assessment is shown in the column coloured green, with RPS's assessment in the blue coloured column to the right.

14. Summary and Conclusions

- 14.1. This section also forms my Summary Proof of Evidence.
- 14.2. The proposed development will have an extremely negative effect on local views and on local landscape. It will also negatively affect some more distant views and create a negative effect on the landscape therefore from where those views are seen. This is because the scale of what is proposed is completely incongruous within a landscape which by its baseline definition is highly sensitive and susceptible to visually over-scaled proposals relative to it.
- 14.3. The value of these views both near and far is high and they are views of a landscape that is highly sensitive and susceptible to the change in them that this proposal would bring. The proposal should therefore be refused to protect both the landscape and the views as the proposal would seriously undermine their value.
- 14.4. This is particularly evident and important given the local authority allocations to more or less simultaneously increase residential development next to the site. This will mean that the number of sensitive visual receptors local to the site will increase and that therefore the magnitude of negative visual impact will increase over time and significantly so.
- 14.5. Not only therefore will this proposal visually blight the local landscape, it will also blight to varying degrees, often severely, the views of local receptors both now and on an increased basis into the future. This adds to the significance of the negative visual impact of this proposal in my view.
- 14.6. Whilst the landscape can accommodate low rise development, it cannot accommodate vertical elements that are so high that they visually make a mockery of its subtle topography which is a key sensitivity. This increases again the significance of the negative visual impact proposed.
- 14.7. This is contrary to the policies of the development plan covered by Mr James Neave.
- 14.8. Although the site is on a piece of land designated for this type of use, its form and scale are contrary to the development plan. What is proposed is a stack 95m tall as well as ancillary buildings up to almost 36m high. The proposed stack is so high that it almost tops the table of stacks of its kind elsewhere (**See Appendix 11**). Such a high stack will dominate an otherwise gentle and rolling rural scene which despite its ability to accommodate low rise development successfully in visual impact and character terms would, due to its topographic and contextually sensitive which is high, be very significantly and negatively impacted.
- 14.9. The existing landscape accommodates in a visually successful way the current buildings, chimneys and stored materials on the site. In the same way, the broader landscape accommodates Horsham itself within its gently rolling wooded landscape. This proposal will not integrate visually into the landscape to any meaningful extent due to the excessive height of the stack proposed. It will visually assert and proclaim itself as a most unwelcome element in an otherwise mainly balanced rural and suburban scene. It will, because of the height of the proposed stack, draw the eye of all who see it and distract them from the pre-existing view. To propose such a tall stack in such a gentle rural scene would be damaging. The baseline study of the existing landscape proves this as set out above in this Proof.
- 14.10. The site occupies a strategic location which makes it capable within a proposal such as this of exerting a negative visual impact on the LCAs around it. At a district level, it is proposed within P1 which is the source of the River Arun. This is a unique and unspoilt valley and it is heavily wooded with Boldings Brook at its base. Current uses on the site are effectively screened from the P1 valley. However, the screening which is there is at a maximum and fits the height of what is there and so

screens it. It is likely that the introduction of a 95m high stack would not affect views from wooded areas within P1 but moving south, P1 becomes more open and high significant visual damage will occur. This point in terms of significance of negative effect must account for the fact that due to the expansion of Horsham housing in this area, there will be an increasing pressure of use on the landscape local to this site i.e. I2, P1, K2, LW4 and LW8.

- 14.11. P1 heading south and out of the woods rises up onto open fields where the damage of the proposal visually would be very high due in no small measure to the fact that it would read in the foreground of what are breath taking and entirely rural unspoilt views looking south from P1. In addition, from viewpoints 21 to 26, the site is part of a beautiful subtly sweeping slope as LW4 gives way to LW8 revealing distant views to the wider landscape beyond.
- 14.12. At viewpoint 29, the threshold nature of the site's location as an important part of a bigger sequence becomes apparent. The north south routes from which this view is taken are aligned at 90 degrees to both LW8 and LW4. The large scarp slope which together they create is a sensitive sequence. The fact that the site will be visible within this sequence at places means that it will bring negative visual impact within this landscape sequence and the magnitude of the impact overall will at least to some extent be increased overall.
- 14.13. Furthermore, the siting of this proposal as a very negative element in the landscape is made worse by its occurrence on the LCAs as they combine to create a most beautiful highly valuable and highly sensitive to vertical intrusions sweeping slope down to Horsham and beyond. Viewpoints 21 to 26 illustrate how brutally incongruous within the local context this proposal actually is in visual terms.
- 14.14. Further, these are views from public rights of way and from land which is sensitively, indeed creatively, future designated as a cemetery as part of the expansion of Horsham. Therefore, within this context and within the mindset of future receptors, the proposal will be very harmful.
- 14.15. As well as its significant local negative visual effect, the proposal would also have at least an enhanced sensitivity therefore as it is a key curtain raising event in the topography sequence and a much larger landscape than covered by its local context in plan. Within this complex and delicate baseline character. the 95m tall stack will occur visually as a totally alien and dominant event on what are historic indeed ancient routes which humanity has always taken in the journey from London south to the sea.
- 14.16. The proposed stack will damage the landscape further by having a negative impact on not only local but also longer-range views from key locations including the AONB of the High Weald, and from the elevated suburban edge of South Horsham. This adds considerably to the significance of the negative impact.
- 14.17. The proposal will also have a negative visual impact on Warnham Park which because of its status is unacceptable in terms of impact.
- 14.18. It is odd to say the least that RPS have concluded essentially that the visual impact of this proposal is not significant. It is true that the site itself is remarkably well screened from view and that it accommodates its current uses including the land fill well. It is also true to say that the local landscape surrounding the site contains many trees, hedgerows and woodlands. However, it is most definitely wrong to say that these elements can work together to mitigate the visual impact of this proposal down to an acceptable level because they cannot as the stack is too high. The proposed chimney stack will extend up into the sky well above the tops of the existing mature trees. There will be clear views available within the landscape to this stack. It is by no means true to say that baseline aspects of the landscape currently support this proposal by making it visually acceptable.

- 14.19. The proposal is for the stack and other associated buildings. The latter have been “lumped together” to create what reads as a single, large monochrome building which is in itself out of keeping with existing buildings on the development site.
- 14.20. The proposed building is visible in Viewpoints 13, 14 and 28. It is very prominent locally in viewpoint 14 where it is in sharp contrast with its setting which currently still feels to be part of the rural scene. It is too high and blocks views to the treed horizon. In addition, the lighting of the proposed building increases its visual impact, introducing large structural lighting in an area where there is otherwise none. The proposed building is also visible in viewpoint 28 and is unintegrated within the view. It blocks the long-range view and is large and clumsy, contrasting sharply with the detailed nature of the landscape.
- 14.21. Because of its brutalism visually, it generates further feelings of industrialisation in an otherwise largely unaffected area where the current impact of industry on the landscape is significantly smaller than what is proposed.
- 14.20 According to RPS, the plume tends to be up to 2 - 3 times the diameter of the stack, which means 5 – 7m high, and up to a few tens of metres in length although this varies with the weather. It is acknowledged by RPS that: *“the visible plume could increase the visual effects of the proposed development by giving the local area a more industrial appearance to visual receptors who witness it”*. RPS further state that: *“The proposed development would appear as a more noticeable element in wider views from more elevated locations and the visible plume would cause views to be drawn to the development by appearing from the top of the stack due to the plume emphasising the location of the 3Rs facility. Where the proposed development is not visible, the visible plume would, on occasion, alert visual receptors of its presence despite being entirely screened from view”*.
- 14.21 This description confirms that the plume will, when it is seen, increase the visual impact of this proposal, not only in local but also in more distant views. The plume will be visible from a number of landscape character areas. It will like an ephemeral flag help to proclaim this visual intrusion on and in the landscape.
- 14.22. The proposal will be visible from many locations and RPS have even demonstrated that in the ZTV which according to the notes on their drawing is accurate and has been adjusted for the visual shadowing effect of both trees and buildings.
- 14.23. From the visual impact point of view, to make matters worse, this proposal contains a significant lighting component. This means that there will be red aviation warning lights up in the sky at 93.5m and at 52m high, and lights on the building too. There is currently no lighting in the landscape other than street lighting on main roads and lights in buildings in Horsham. The sky at night is dark and these lights will be totally incongruous and will of course draw the eye. This factor affects all the views where there is negative impact by day, and it increases the magnitude of the significance of the negative visual impact. It does this because it highlights the height of the stack and this will confuse the eye of the beholder as it will be the only light in the sky. It is mentioned in LW8 a perceived threat which is part of the signature of the LCA which is the extension of the influence of Gatwick Airport. This of course relates to the noise of aeroplanes, but it highlights the sensitivity that exists in the minds of receptors within the LCA. It is therefore logical to assume that there is a heightened sensitivity in this respect, i.e. the issue of Gatwick Airport and that this proposal adds to that sensitivity and crosses over it.

Signed:

David Coomes