



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
Tel 01825 890975
e-mail info@cpresussex.org.uk
www.cpresussex.org.uk

Mr Sam Dumbrell
County Planning
West Sussex County Council
County Hall
Chichester
PO19 1RH
By email: planning.applications@westsussex.gov.uk

13th April 2018

Dear Mr Dumbrell,

WSSC/015/18/NH: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure. Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD

This is the second formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above application and should be considered alongside our representation of 4th April by Dr Roger Smith, CPRE Sussex Trustee. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

In summary, CPRE Sussex acknowledges the changes in the design and form of the proposed complex from that the subject of the previous application (WSSC/062/16/NH), but still **objects** to this application on the grounds of being **at odds with the prevailing landscape character of the locality of the site, visual impact and loss of tranquillity**, with consequent failure to comply with Policies W11, W12 and W19, and therefore Policy W10, of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework, and there being no material considerations that indicate a decision other than in accordance with the development plan.

Section 38(6) of the Town and Country Planning Act requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. The “development plan” for the purposes of this application comprises the policies of the West Sussex Waste Local Plan and the Horsham District Planning Framework. We consider that the principal material considerations are the National Planning Policy for Waste and the National Planning Policy Framework.

We note that Policy W10 of the West Sussex Waste Plan; Strategic Waste Allocations, allocates the site for, in principle, the development of waste management facilities for the transfer, recycling, and/or recovery of waste to meet identified shortfalls in transfer, recycling and recovery capacity, subject to accordance with the policies of the Plan and satisfactorily addressing the ‘development principles’ for that site identified in the supporting text to the policy.

We consider that Policies W11, W12 and W19 are particularly relevant to this application. Policy W11 requires proposals for waste development not to have an unacceptable impact on the character, distinctiveness, and sense of place of the different areas of the County and to reflect and, where possible, reinforce the character of the main natural character areas.

Policy 25 of the Horsham District Planning Framework also seeks to protect the landscape character of the District against inappropriate development, and only supports development proposals that, inter alia, protects, conserves and enhances landscape character. Policy 26 of the Framework protects the rural character of the countryside and, although it allows for development for the disposal of waste, it establishes that development in the countryside will only be acceptable where it protects and/or conserves and/or enhances the key features and characteristics of the landscape character area in which it is located, including tranquillity.

We note the first sentence of paragraph 5.1.6 of the EIA NTS; *“the scale of existing development such as the Brookhurst Wood Landfill Site and other industrial scale operations in the immediate vicinity of the site means that the landscape character area within which the site sits and adjacent character areas would be able to absorb the 3Rs Facility without compromising its key characteristics.”*

However, notwithstanding the redesign of the complex, the EIA still concludes that the development would have a “moderate adverse” effect on the Horsham Character Area P1: Upper Arun Valley and “minor adverse” effect on K2: Faygate and Warnham Vale. The EIA also concludes that the proposed development would have a minor adverse impact on the larger-scale West Sussex Character Area LW8: Northern Vales (Table 5.6).

The EIA concludes that neither effect is “significant”, which we consider odd for a “moderate adverse” effect, as does the fact that the EIA considers the sensitivity of Horsham Character Area K2: Faygate and Warnham Vale to be low whereas the sensitivity of the other character areas is considered to be medium, even at the larger scales of the West Sussex LCA and

National Character Areas. (We note that the reason given for this is the declining quality of the landscape character, but surely an area where landscape character is declining is more vulnerable to further detrimental change?)

Any argument that an individual development only has a minor effect on landscape character and is therefore acceptable can be repeated too often, leading to the insidious cumulative degradation of landscape character. In fact, the Brookhurst Wood activities are completely out of character with the landscape character of the wider surrounding area, which is pastoral and densely wooded typical of the Low Weald Hills (LW4) as defined by the WSCC Land Management Guidelines. The proposed development would also be completely out of character with the wider prevailing landscape character.

By consolidating the industrial nature of the site and introducing significantly larger buildings (even at the reduced height now proposed) we consider that the proposed development would be harmful to the character of the landscape in which the proposal is located and that the proposed development is therefore contrary to Policy W11.

Policy W12 requires proposals for waste development to be of high quality with the scale, form and design taking into account the need to integrate with adjoining land uses and have regard to the local context, including the varied traditions and character of the different parts of West Sussex, the topography, landscape, townscape, streetscape and skyline of the surrounding area and views into and out of the site. Policy 32 of the Horsham District Planning Framework expects development to, inter alia, complement locally distinctive characters of the district and create a sense of place both in the buildings...and in the way they integrate with their surroundings.

We note that the EIA Non-Technical Summary (NTS) concludes, in paragraph 5.1.4, that *“The site is situated within the context of the existing Brookhurst Wood landfill site and existing industrial development to the north, south and east”*. However, we consider that the EIA here underplays the likely impact of the proposed buildings, which include the very large Boiler Hall building, up to 35.92m high, 59.43m long and 29.58m wide, and the bunker, 32.43m high, 24.15m long and 59.3m wide. These are both of very considerable bulk and, particularly, are of a height significantly higher than any of the existing buildings on the site. They would therefore bear only limited relation to the existing buildings. In addition, the development would include a 95m high flue stack, which would be wholly dissimilar to the existing buildings.

We therefore consider that the existing development on the site would actually provide little in the way of a comparable context for the proposed development. The scale and form of the proposed development would not integrate with the immediately adjoining land uses to the north, south, east or west. As we explain above, we also consider that the proposed development would be against the characteristics of the surrounding area. We therefore consider that the proposed development would not satisfy criterion (a) of Policy W12 of the

West Sussex Waste Local Plan and fail to accord with Policy 32 of the Horsham District Planning Framework.

As regards views into and out of the site, we note that the EIA includes assessments from a number of mid- and long-range viewpoints, including rights of way and other public viewpoints in the vicinity. We note that the EIA concludes that, at worst, the operational phase of the proposed development would have a “minor adverse” impact. However, we do not agree with this assessment from viewpoint 3.

In viewpoint 3 the stack is shown in the photomontage as a prominent feature almost directly in the sightline walking down the footpath. Perhaps the visual impact methodology does come up with “minor adverse” but we think that the methodology does not really fully take into account human perception: the stack is clearly prominent and incongruous in this view and would therefore draw the eye, particularly with a plume.

We do accept that the revised design would reduce the visual impact of the proposed complex as a whole. However, in viewpoint 4, the proposed buildings would be clearly visible in a section of the view framed by existing vegetation, which would focus the eye on the complex. In viewpoint 11, even at the reduced height now proposed, the sheer scale of the proposed buildings would still be unlike anything else in the view and would inevitably draw the eye.

As regards close range views, we noted that the EIA for the previous application did not include any close range view photomontages to confirm the conclusion, in paragraph 5.2.5, of the Non-Technical Summary (NTS) that *“Although the building and stack of the proposed development are large, the majority of them would be heavily screened from view for close range visual receptors. The high level of existing vegetation in the local area means that visibility of the proposed development would be severely limited and where it does appear in local views, only the very top of the building and the stack would be visible.”*

We are pleased to see that the EIA accompanying this revised application does include close range view photomontages. The view from viewpoint 14 Station Road/footpath 1574-1, is particularly telling as it would be of the great majority of the western elevation and part of the southern elevation of the complex. Paragraph 5.8.68 of the EIA concludes that for pedestrians the impact on views would be “moderate to major adverse”. This confirms that our previous concerns about close-range views; that the context would actually do little to reduce the visual impact of the proposed development and that the view of the top of the building and the stack above existing vegetation would serve to demonstrate their sheer bulk and incongruous height, were correct. We also note that, whilst there is some screening of the site along Langhurstwood Lane, this screening is deciduous, and therefore considerably less effective during the winter months.

The photomontages from viewpoints 19 – 26 demonstrate just how tall the proposed stack would be and what a substantial impact it would have. We find it hard to agree with the conclusion of the EIA that the impact on views from these viewpoints would only be “minor adverse”. Only in views from viewpoints 28 and 29 could we possibly agree that the impact on views would be “minor adverse”. Even then, the impact is still adverse i.e. harmful.

Paragraph 3.85 of the Planning Statement submitted with the application states that “*The external colours would also aid the visual reduction in height by having the higher elements in lighter greys with a darker grey plinth at a lower level.*” This appears to be contradictory to paragraph 5.6.12 of the EIA which states that “*the building would be clad in muted brown, green and grey colours*”.

We agree that light grey would generally be preferential for those elements of the development that are visible above the skyline and are therefore seen against the sky. However, some of the viewpoints of the proposed development are at a higher elevation such that the buildings would be seen against a backdrop of land rather than sky (e.g. viewpoints 4 and 11). From here, dark colours would mitigate the impact of the buildings.

We therefore consider that the proposed development would not satisfy criterion (b) of Policy W12.

Policy W19 seeks to ensure that lighting, noise, dust, odours and other emissions will not have an unacceptable impact on public health and amenity. A significant change from the existing operation on the site is the fact that the proposed recovery unit would operate 24 hours a day. This could give rise to activity and noise during the night.

The proposed 24 hour operation would also give rise to a need for external lighting on the site. We note that the EIA indicates that this would be emergency and escape route lighting, lighting of the walkways and stairways around the process equipment which would only be switched on when operators need access to a specific level (but no indication of how often or for how long this may be), and red obstacle lights on the stack and corners of the boiler building. We consider that this lighting would draw attention to the facility – indeed, the red obstacle lights are specifically intended to warn of the presence of the flue and building. We therefore consider the proposed development to be contrary to Policy W19 of the West Sussex Waste Local Plan and Policy 26 of the Horsham District Planning Framework.

Given, in our opinion, that the proposed development fails to accord with Policies W11, W12 and W19 of the West Sussex Waste Local Plan, we also consider that it fails to comply with Policy W10.

As regards material considerations, we note that the National Planning Policy for Waste specifies landscape and visual impacts and noise and light as factors to be considered by waste

planning authorities in the preparation of local plans and in determining planning applications. The National Planning Policy Framework identifies recognising the intrinsic character and beauty of the countryside and contributing to conserving and enhancing the natural environment as core planning principles.

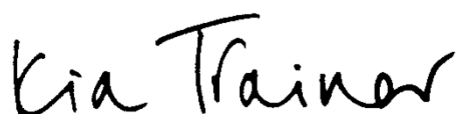
We therefore consider that Policies W10, W11, W12 and W19 of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework are compliant with the National Planning Policy for Waste and the National Planning Policy Framework, that these two documents support these local plan policies and that therefore neither indicate that a decision should be made other than in accordance with the adopted local plans.

In conclusion, therefore, CPRE Sussex **objects** to this application on the grounds of being **at odds with the prevailing landscape character of the locality of the site, visual impact and loss of tranquillity**, with consequent failure to comply with Policies W11, W12 and W19, and therefore Policy W10, of the West Sussex Waste Local Plan and Policies 25, 26 and 32 of the Horsham District Planning Framework and there being no material considerations that indicate a decision other than in accordance with the development plan.

However, if the Council is nevertheless minded to approve the application, we will expect the permission to be subject to conditions and/or a legal agreement controlling the materials and finishes of the proposed buildings (with the careful use of shade and tone to break up the bulk of the buildings), hours of operation, external lighting, noise and other emissions (unless subject to Environment Agency control).

We trust these points will be taken into account in determining this application.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The signature is written in a cursive, flowing style.

Kia Trainor

**Director,
CPRE Sussex**