

**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**

**WSCC/015/18/NH**

**REBUTTAL ON BEHALF OF THE LOCAL PLANNING AUTHORITY**

**WEST SUSSEX COUNTY COUNCIL**

**BY DAVID COOMES**

**IN RESPONSE TO:**

**PROOF OF EVIDENCE BY CORINNA DEMMAR, SEPTEMBER 2019, ON BEHALF OF BRITANIACREST RECYCLING LIMITED**

Date: 17.10.19

**EDCO Design**

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## **Introduction**

1. I have now had the opportunity to view the Proof of Corinna Demmar. Before addressing the new viewpoints that have been submitted by RPS (labelled viewpoints 30 to 38) there are two matters I address first.
2. First, I note that Ms Demmar has referred to a number of background documents and policy documents relating to the allocation of the appeal site in the Waste Local Plan. As stated in my Proof of Evidence, policies and policy documents will be dealt with by Mr Neave. However, I do say that none of these documents contain any detailed landscape and visual assessment of an EfW development such as this at the appeal site (with a 95-metre stack), as clearly that must be dealt with at application (and indeed where necessary appeal) stage.
3. Second, I attach a corrected version of Appendix 8 of my Proof of Evidence, which is the table relating to impact on visual receptors. On reviewing my Proof, I noticed I had incorrectly entered the findings in the “significance EDCO” column for VPs 6, 7, 14, 16, 17, 19 and 20. This is corrected now.
4. In relation to the new viewpoints, it is important to say that other than one viewpoint (namely, viewpoint 30), none of the other viewpoints have a verified view showing the development in place. This is very unhelpful and makes it very difficult to judge impact.
5. I also note that these new viewpoints to the west of the appeal site are in close proximity to a number of the locations A to K within Appendix 9 to my Proof of Evidence (photo location plan at Appendix 10), which are taken from within District-level Character Areas I2 and P1. In particular, from these locations A to K the Inspector will be able to imagine how the views and landscape from these locations will be negatively impacted by the proposal.
6. Below are my non-exhaustive comments on specific viewpoints.

## **Viewpoint 30**

7. There is a ‘before and after’ photomontage from this location. This is from the driveway to one of the properties at Andrews Farm, off Station Road. I do not agree with Ms Demmar’s analysis or conclusions.
  - The proposed buildings are clearly visible, and not just the tops of them, at least when the trees are not in leaf as shown in this photograph.
  - The proposed stack is also very highly visible.
  - The height of the stack is very intrusive, significantly breaking the skyline. It is completely out of scale and at odds with all other elements in this view and adds very significantly to a sense of industrialisation. I disagree with the conclusion that it will “not dominate the views”.
  - I disagree with the description of the stack as a “slender element of the building rising out of a simple wooded landscape”, almost as though it is an element of beauty. In my opinion, it is very far from that.
  - It is also clearly apparent from the photomontage that the proposed development would change the character of the view from one which is essentially rural at present to one which will have a very industrial feel to it.
  - For these reasons, the adverse visual impact of the proposed development would be high in my opinion, by both day and night.
  - The receptors are local residents whose sensitivity is high

- The significance of the impact is major adverse.

#### **Viewpoint 31**

8. There is no “before and after” photomontage of this view which means that analysis of the impact is to an extent merely conjecture. Having said that, I doubt that the view of the stack would be constrained by the woodland, and I suspect that the visual impact of the proposed development, particularly the stack, would be medium or high.

#### **Viewpoint 32**

9. There is no “before and after” photomontage of this view. However, by reference to the photomontage of Viewpoint 30, one can see that firstly the proposed building would be seen above the skyline from this location, and secondly much more than just the upper part of the stack would be seen above it. In fact, I would judge that the majority of the height of the stack would be visible. For these reasons, although it may only be a glimpsed view, I would suspect that the visual impact would be medium or high.

#### **Viewpoint 33**

10. I agree that from this particular viewpoint, the proposed facility would be likely to be screened by the grouping of trees concentrated in the foreground. However, it is likely that moving across the Common (which is within a Conservation Area and is designated as a Village Green) towards the right in the photograph, views of the proposed development would emerge where there is no tree screening.

#### **Viewpoint 34**

11. I agree it would appear that there would be some screening of the proposed facility from this particular view. However, in other locations on the Common (again in a Conservation Area and designated Village Green) from where there are views through the gaps between the trees, the proposed development may be visible. Where it is visible, the visual impact would be likely to be high.

#### **Viewpoint 35**

12. Without a photomontage, it is not possible to assess the impact of the proposed development in this view. I would, however, query why this particular location has been selected when there is no photograph offered of the view from the nearby residential properties, for example at Old Manor Farm (which is Grade II listed and in a Conservation Area), which as residential receptors would likely be negatively affected by the proposal.

#### **Viewpoints 36 and 37**

13. Without a photomontage, it is not possible to assess the impact of the proposed development in these views.

#### **Viewpoint 38**

14. Without a photomontage, it is not possible to assess the impact of the proposed development in this view. I would, however, comment that while the trees in the mid ground may provide some

screening from the exact viewpoint location chosen, they may not provide screening if the location was slightly changed.

### **Conclusion**

15. As already set out in my Proof of Evidence, my professional opinion is that the proposed development will have an extremely negative effect on landscape and visual receptors. These new viewpoints produced by the Appellant do not change my opinion, indeed they further illustrate the extremely negative effect on landscape and visual amenity that would result if this appeal were allowed.

**David Coomes**