

WEALDEN 3Rs

BCR 2.6 REBUTTAL PROOF OF EVIDENCE OF CORINNA DEMMAR

Landscape and Visual Resources

On behalf of Britaniacrest Recycling Limited

In relation to an appeal against the decision of West Sussex County Council to refuse planning permission for a proposed Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure at Wealden Brickworks, Horsham

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1 INTRODUCTION

- 1.1 My name is Corinna Demmar and I am a Senior Director with RPS Group PLC. I am acting as a witness for landscape and visual resources on behalf of Britaniacrest Recycling Limited.
- 1.2 This rebuttal proof of evidence is submitted in response to the proofs of evidence submitted for exchange.
- 1.3 I have read the various proofs of evidence submitted to the Inquiry and I respond to issues raised in respect of landscape and visual resources in the submitted evidence of:
- David Coomes (EDCO, for West Sussex County Council)
- 1.4 Insofar as I can usefully comment on it, I have. My silence on any particular point should not be taken as agreement to it.

2 LANDSCAPE AND VISUAL IMPACT ASSESSMENT METHODOLOGY

Approach to Landscape and Visual Impact Assessment

- 2.1 The preface to the Third Edition of GLVIA states that *“this edition concentrates on principles and process. It does not provide a detailed or formulaic ‘recipe’ that can be followed in every situation”* (page x, second paragraph).
- 2.2 However, the GLVIA explains at para 2.24 *“In all cases there is a need for judgements that are made to be reasonable and based on clear and transparent methods so that the reasoning applied at different stages can be traced and examined by others”*.
- 2.3 The GLVIA adds, Landscape professionals undertaking LVIA’s *“must be able to take a sufficiently detached and dispassionate view of the proposals in the final assessment of landscape and visual impact. In carrying out an LVIA the landscape professional must always take an independent stance, and fully and transparently address both the negative and the positive effects of a scheme in a way that is accessible and reliable for all parties concerned”* (GLVIA, paragraph 2.26).
- 2.4 The RPS methodology is derived from both the GLVIA and the Design Manual for Roads and Bridges (DMRB) (Interim Advice Note 135/10: Landscape and Visual Effects) (IAN) (Appendix 8 of my proof of evidence). Mr Coomes prefers to *“adopt an approach which is slightly less prescriptive in its descriptions [than the RPS methodology]”* (DC proof of evidence, paragraph 4.8) and instead *“takes a broader approach”* to defining criteria (DC proof of evidence, paragraph 4.12). Mr Coomes’ Table C (page 8 of his proof of evidence) for example, allows him to attribute landscape sensitivity with no reference to definitions.
- 2.5 Mr Coomes’ methodology confuses Landscape and Visual assessment, e.g. his description of the ‘exquisite views’ in his section on landscape baseline (his paragraph 6.22) such views are part of the visual resource, experienced by visual receptors, i.e. people. There is a lack of objectivity in his description of effects and, as not all his criteria are clearly defined, his assessment process is difficult to follow.

Another example is where Mr Coomes uses one Viewpoint (Viewpoint 4) to assess the effects on the character of the High Weald AONB (his paragraph 10.12).

2.6 The two separate, component parts of Landscape and Visual Impact Assessment are:

1. **“Assessment of landscape effects:** *assessing effects on the landscape as a resource in its own right;*
2. **Assessment of visual effects:** *assessing effects on specific views and on the general visual amenity experienced by people.”* (GLVIA, Paragraph 2.21, GLVIA emphases).

2.7 GLVIA paragraph 2.22 explains that *“the distinction between these two aspects is very important but often misunderstood, even by professionals. LVIA must deal with both and should be clear about the difference between them. If a professional assessment does not properly define them or distinguish between them, then other professionals and members of the public are likely to be confused.”*

2.8 The second edition of the GLVIA (2002) used the BP Wytch Farm Complex on Furzey Island, Dorset, as an example to illustrate the differences between the two aspects of LVIA. The BP complex has minimal visual impact, but, is part of the landscape character (page 39, of Appendix 1 to my rebuttal). Figure R3 to my rebuttal illustrates the land uses adjacent to the Appeal Site, which are screened or partly screened from view, but nevertheless form part of the character of the landscape, for example the Langhurstwood clay pit, to the north-east to the Appeal Site. The CLCA LW8 also ignores the industrial uses in the landscape, in the idealised sketch of the Horsham/rural boundary in the Land Management Guidelines (CD167).

2.9 For ease of comparison, the RPS criteria and definitions and the criteria and definitions used by Mr Coomes for his LVIA assessment are set out at Appendix 2 to my rebuttal proof.

3 LANDSCAPE ASSESSMENT METHODOLOGY

- 3.1 GLVIA paragraph 5.38 states that *“judging the significance of landscape effects requires methodological consideration of each effects identified and, for each one, assessment of the sensitivity of the landscape receptors and the magnitude of the effect on the landscape.”*

Sensitivity of Landscape Receptors

- 3.2 To analyse the sensitivity of the landscape receptor or resource is to make a judgement on susceptibility to the type of change proposed and on the value of the landscape receptor or resource.
- 3.3 The sensitivity of the Horsham LLCAs that form the Horsham DLCAs varies, it is not uniform, for example, Figure R1 illustrates the variance in sensitivity within the DLCAs adjacent to the Appeal Site to proposed large-scale employment development. The sensitivity of LLCA 15: Warnham Brickworks is judged to be Low to this type of development.
- 3.4 For reference, the RPS definitions of sensitivity are at CD029, Chapter 5, Table 5.1 (page 5-13). The DMRB definitions are at my Appendix 8, IAN Annex 1, page 31, Table 2).

Susceptibility to Change

- 3.5 Susceptibility to change is the *“ability of a landscape receptor (be it overall character, quality/condition, element, feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without excessive changes to the baseline situation and/or consequences for achievement of landscape planning policies and strategies”* (GLVIA paragraph 5.40).

Changes to the landscape baseline

- 3.6 The Appeal Site lies within LLCA 15: Warnham Brickworks (CD104) which has an industrial character. The susceptibility of the landscape character of LLCA 15 (including the component parts that make up that character) to the proposed change is Low. While there will be changes in the size of the building and stack, these will not result in excessive changes to landscape character.

The Effects on Landscape Planning Policies and Strategies

- 3.7 Land management guidelines are specific to the Landscape Character Area boundaries and do not relate to adjacent landscape Character Areas.
- 3.8 The 3Rs facility would lie partly (potentially wholly, see Appendix 1 to my proof of evidence) within DLCA K2: Warnham and Faygate Vale. The other part of the 3Rs facility would lie partly (potentially not at all) within DLCA P1: Upper Arun Valley. The planning and land management guidelines for these DLCAs are on pages 121 and 153 of CD108 (the Horsham District Landscape Character Assessment, 2003) respectively. Figure R7 of my rebuttal proof illustrates the boundaries of the DLCAs (as set out in CD108) across the Appeal Site. From this figure it can be seen that the building straddles both DLCA K2 and DLCA P1, with the stack being wholly within DLCA K2.
- 3.9 The only planning and land management guideline for DLCA K2 that could be relevant to the location of the 3Rs facility is the first bullet point which primarily refers to expansion of the urban areas of Horsham and Broadbridge Heath. With reference to this expansion, it states that buildings should blend in with the landscape in scale form colour and design.
- 3.10 Appendix 1: Statement on Design Approach, to Mr Lecointe's proof of evidence, considers the evolution of the design of the building. Section 5 of my proof of evidence considers how the building blends into its landscape context at paragraphs 5.6 to 5.11. The Appeal Site is located adjacent to the MBT plant, itself a large modern building. The 3Rs facility is a simple structure with coloured façades using the High Weald AONB colour palette. The curved roof is similar to the simple curved form of the Brookhurst Wood landfill. The building has been sunk, to bring the height of the building below the tree line, when viewed from most locations. The landscape design is simple, extending the existing regenerating woodland and screening the smaller elements of the development, such as the car-parking areas.
- 3.11 No planning and land management guidelines in DCLA P1 are of relevance to the Warnham Brickworks or the 3Rs development.
- 3.12 The land management guidelines for the County Landscape Character Areas (CLCAs) are set out in The West Sussex Landscape Character Assessment (2003)

(CD167). The one land management guideline that is applicable to the 3Rs facility is in relation to the urban edges of towns, where new development should be well-integrated with the wider landscape pattern and buildings should also blend in with the landscape in scale, form, colour and design. Details of how the 3Rs facility has responded to the landscape are set out in paragraph 3.10 of my rebuttal proof of evidence.

- 3.13 It is relevant that the West Sussex Waste Local Plan (2001-2016) Deposit Draft (Revised Deposit Draft, July 2004) (CD144) considered Warnham Brickworks to be suitable for an energy from waste plant/built waste management facility at, or just post, the completion of the Horsham District Landscape Character Assessment (CD108) and the West Sussex Landscape Character Assessment (CD167) (both published in 2003) and has been a preferred/allocated site for a built waste facility in every planning document since that date.

Landscape Value

- 3.14 The GLVIA sets out the method for establishing the value of a landscape receptor at paragraphs 5.44 to 5.47. Those landscapes of highest value are designated at national level, e.g. National Parks and Areas of Outstanding Natural Beauty. Other landscapes might be designated at a local level, e.g. Areas of Great Landscape Value, or Special Landscape Areas. The Appeal Site, the wider Warnham Brickworks and the surrounding landscape areas are not nationally or locally designated (paragraph 4.16 of my proof of evidence).
- 3.15 At paragraph 5.47 GLVIA notes, in reference to nationally designated landscapes, *“if a proposal is on the margin of or adjacent to such a designated area, thought might be given to the extent to which it demonstrates the characteristics and qualities that led to the designation of the area.”* The Appeal Site is not adjacent to or on the margin of a nationally designated area (paragraph 4.13 of my proof of evidence) it lies 3.3 km from the closest point of such an area. The land between the Appeal Site and the AONB is soon to become a mixed-use development (CD139) with consequent effects on the setting of the AONB.
- 3.16 Mr Coomes makes much of the scenic qualities of the landscape, describing the slope down to Horsham as being ‘hallowed land’ with an ‘essence of grandeur’. Yet

it is not so beautiful to be designated and not so sensitive to prevent the allocation of the Land North of Horsham. The essence of grandeur of the slopes to the north of Horsham will be permanently changed by the Land North of Horsham development.

- 3.17 The GLVIA advises that other landscapes might not be designated but be valued at a local level. An assessment of perceptual aspects of the landscape should be undertaken, these are set out in Table 5.1 (GLVIA, page 84). Paragraphs 4.18 to 4.20 of my proof of evidence set these out in relation to the Appeal Site and the wider Warnham Brickworks. Special or valued qualities are not identified in the adopted development plans and the landscape of which the Appeal Site forms part, does not qualify as a 'valued landscape' (paragraph 4.20 of my proof of evidence).
- 3.18 Mr Coomes asserts that this part of the NCA/CLCA/DLCA is particularly sensitive. The Horsham District Landscape Capacity Study (CD0104) shows that this is not the case (my Figure R1 to my rebuttal proof). He does not consider the urbanising effect of the Land North of Horsham development on landscape character of this part NCA/CLCA/DCLA. Figure R3, of my rebuttal, illustrates the area of land that the Land North of Horsham development would directly impact and the surrounding areas that would be indirectly affected.

Magnitude of Landscape Impacts

- 3.19 When assessing the magnitude of impact on landscape character the GLVIA (paragraph 5.48) explains that the impact should be assessed in terms of; size or scale; geographical extent; and, its duration and reversibility (as summarised on page 56, Diagram 1, of my proof of evidence). The GLVIA explains the processes to be undertaken with regards to all three matters in paragraphs 5.49 to 5.52.
- 3.20 For reference, the RPS definitions of impact magnitude are set out at CD029, Chapter 5, Table 5.2, page 5-14. The DMRB definitions are contained within IAN Annex 1, Table 1, page 30 of Appendix 8 of my proof of evidence.

Size or Scale

- 3.21 Changes due to size or scale should be described and categorised on a verbal scale that "*distinguishes the amount of change*" with the loss or addition of new

features being categorised. In order to do this the judgements should take account of:

- *“The extent of existing landscape elements that will be lost, the proportion of the total extent that this represents and the contribution of that element to the character of the landscape...;*
- *The degree to which the aesthetic or perceptual aspects of the landscape are altered either by the removal of existing components of the landscape or by the addition of new ones...; and*
- *Whether the effect changes the key characteristics of the landscape, which are critical to its distinctive character” (GLVIA, paragraph 5.49).*

Extent of Change

- 3.22 The development of the 3Rs facility will replace a much-repaired, built waste management facility with a new ‘fit for purpose’ built waste management facility, and associated landscape proposals. The building and stack will be larger than the current facility, but the character of Local Landscape Character Area (LLCA) 15: Warnham Brickworks (CD104) will not change, it is an industrial site, that has industrial and waste uses within it: the Weinerberger Brickworks; the Brookhurst Wood landfill; the current Britaniacrest waste management facility; and the recently built MBT plant. It will remain an industrial site. The Appeal Site forms 7.3% of LLCA 15.
- 3.23 The Appeal Site is partly located within District Landscape Character Area (DLCA) K2: Warnham and Faygate Vale (in which the Land North of Horsham development is also partly located) (CD108). The 3Rs facility will not remove any features or elements from DLCA K2 that contribute to the character of the DLCA, or, introduce any new elements into DLCA K2. The Appeal Site only forms 0.2% of DLCA K2. The 3Rs facility will not remove any of the features or elements of DLCA P1: Upper Arun Valley and will not introduce any new features or elements into DLCA P1. The Appeal Site forms only 0.5% of the total land area of DLCA P1. The Appeal Site does not lie within DLCA I2: Warnham and Rusper Wooded Ridge.
- 3.24 By comparison the Land North of Horsham development, will permanently remove features and elements that contribute to the landscape character of the DLCAs as

set out in the Horsham District Landscape Character Assessment (CD108) and will introduce substantial new elements over 17.7% of DLCA K2. The Land North of Horsham development area forms 0.6% of the land area of DLCA I2 and will remove features and elements that contribute to the DLCA's character, as well as introducing urban features and elements, permanently changing the character of DLCA I2.

- 3.25 The 3Rs facility will not remove any features or elements that contribute to the landscape character of County Landscape Character Area (CLCA) LW8: Northern Vales (CD167). It will not introduce any new landscape elements into CLCA LW8. The Appeal Site is 0.1% of CLCA LW8. The CLCA includes Gatwick Airport and will include the Land North of Horsham development. The Appeal Site does not lie within CLCA LW4: Low Weald Hills.
- 3.26 The 3Rs facility will not remove any of the features or elements that contribute to the landscape character of National Character Area (NCA) 121: Low Weald (CD110). It will not introduce any new landscape characteristics into NCA 121. The Appeal Site only forms 0.002% of the area of NCA 121. NCA 121 contains urban development, Gatwick Airport and will include the majority of the Land North of Horsham development, the remainder of that development lying within the adjacent NCA 122: High Weald.

Degree of Change to Aesthetic and Perceptual Qualities

- 3.27 The GLVIA sets out a range of factors that can help in the identification of valued landscapes in Box 5.1 (page 84). The list includes landscape quality (condition) and scenic quality as well as perceptual aspects, notably wildness and tranquillity. These and other factors are analysed in paragraph 4.18 of my proof of evidence.
- 3.28 The Warnham Brickworks already exists within wider landscape character areas, whether it is acknowledged in the published landscape character assessments or not. The increased stack height (over and above the existing stack) will alter the scenic quality of the landscape, but not to such an extent that it would significantly change the landscape character.
- 3.29 With regards to landscape quality or condition, the Warnham Brickworks, including the Appeal Site is an industrial area of an ordinary to poor condition. The scenic

quality of the Warnham Brickworks is also poor to ordinary. The new 3Rs facility will improve the landscape condition of the Appeal Site. The scenic quality of the Appeal Site will alter, there will be an improvement due to the old building being removed and replaced with a modern building 'fit for purpose'. The landscape around the building will also improve. However, there will be a limited impact on the scenic quality as the building and stack will be larger than the existing facility. This will have an adverse effect on this aspect of the LLCA and DCLAs as described within ES Chapter 5 (CD029) and summarised in Table 4 of my proof of evidence, none of which are significant.

- 3.30 Neither the Appeal Site, nor, the wider LLCA 15: Warnham Brickworks are wild areas and they are not tranquil. Neither the farmland, nor the mature woodland either side of LLCA 15 are affected by the proposed 3Rs facility.
- 3.31 The future baseline of landscape character to the north of Horsham, particularly to DLCA K2: Warnham and Faygate Vale and to a lesser extent DLCA I2: Warnham and Rusper Wooded Ridge, is one of a permanent change from a rural landscape, to an urban area, due to the Land North of Horsham development. This change in character will be significant both during the day and at night.

Changes to Key Characteristics Critical to Landscape Character

- 3.32 The proposed 3Rs facility will not change to the key characteristics at LLCA 15: Warnham Brickworks (CD104).
- 3.33 The Land North of Horsham development will permanently remove key characteristics from DLCA K2: Warnham and Faygate Vale and I2: Warnham and Rusper Wooded Ridge (CD108) and will introduce urban characteristics into the area to the north of the A264. This development will directly change the character of DLCA K2 and DLCA I2, as well as potentially indirectly affecting other DLCA that it will be viewed from. In contrast, the 3Rs facility will not remove any of the key characteristics critical to the DCLAs it lies in or adjacent to. The industrial characteristics of the Warnham Brickworks are already part of the landscape character.
- 3.34 The Land North of Horsham development will alter the key characteristics of CLCA LW8: Northern Vales and LW4: Low Weald Hills (CD167) albeit to a lesser extent

than it affects those of the DCLAs, as the proportion of the key characteristics it changes is less in these larger landscape character areas. The 3Rs facility will not directly or indirectly alter any of the key characteristics of CLCA LW8 of LW4.

- 3.35 The 3Rs facility will not alter the key characteristics of NCA 121: Low Weald (CD110, Page 6).

Geographical Extent

- 3.36 At paragraph 5.50 the GLVIA explains that *“the geographical extent over which the landscape effects will be felt must also be considered. This is distinct from the size or scale of effect – there may for example be moderate loss of landscape elements over a large geographical area, or a major addition affecting a very localised area.”*
- 3.37 The Wealden 3Rs facility will not remove any landscape elements. It will introduce a larger building and a higher stack than those currently on the Site. However, the effects will be localised, and would predominantly be from the stack, which would be a slim grey structure.

Duration and Reversibility

- 3.38 Duration and reversibility of the landscape effects are described in paragraphs 5.51 and 5.52 of the GLVIA. Duration can be categorised into numbers of years, with definitions of the categories set out clearly. Reversibility, to a degree, depends on the type of development being proposed. Housing is generally considered permanent, whereas wind farms (for example) are considered temporary. Other developments may be partly reversible.
- 3.39 The Land North of Horsham development is considered to be a permanent change to the landscape to the north of Horsham (my Figure R3).
- 3.40 In contrast, the 3Rs facility should not necessarily be considered to be a permanent development. Waste management technology will change in the future and the development at the Appeal Site would change with it. The 3Rs facility is considered to be long-term, but reversible.

Significance of Landscape Effects

- 3.41 The separate judgements on sensitivity of receptor and the magnitude of impact, which themselves draw together different factors, have been sequentially combined by RPS and are set out, with Mr Coomes' assessment in Table 1, below.
- 3.42 The Preface to the Third Edition of the GLVIA (page x, fourth paragraph) explains that it is especially important to note the need for proportionality and to focus on likely significant effects. The LVIA (CD029, Chapter 5) has followed this approach and which was agreed with the relevant Landscape Officers.
- 3.43 GLVIA sets out what might constitute more significant effects and those that might be less significant in paragraph 5.56 and Figure 5.10 (GLVIA, page 92). It notes that *“major loss or irreversible negative effects, over an extensive area, on elements and/or aesthetic and perceptual aspects that are key to the character of nationally valued landscapes are likely to be of the greatest significance.”* The 3Rs facility would not cause such a loss.
- 3.44 For reference, the RPS definitions of significance of landscape effects are at CD029, Chapter 5, paragraph 5.3.17 (summarised in paragraph 6.29 of my proof of evidence). The DMRB definitions are in Annex 1, Table 4, page 33 of Appendix 8 to my proof of evidence.
- 3.45 Mr Coomes criticises the chapter LVIA (CD29, Chapter 5) for not assessing the impact of the landscape character of CLCA LW4: Low Weald Hills and DLCA I2: Warnham and Rusper Wooded Ridge. These areas were not assessed as there are no likely significant effects. There are no direct effects and the potential for the perceptual aspects of the DLCA to be affected by the 3Rs facility is not significant.
- 3.46 Although the ZTV indicates that there are areas of land within which the building and stack are visible, Mr Coomes will be aware that the ZTV is based on topography (i.e. bare earth) with blocks of woodlands and close buildings or urban areas, shown on the OS 1:25,000 maps entered into the model, as stated on the LVIA ZTV figures (CD030, Chapter 5, Figures 5.7 and 5.8). Smaller vertical elements, such as small tree belts, hedgerow and hedgerow trees were not added to the computer model, and their screening potential not mapped, hence a ZTV is a tool only. Where publicly accessible areas in adjacent landscape character areas were covered by

the ZTV, these were investigated. Viewpoint 2 (CD030, Chapter 5, Figure 5.10) is taken from DCLA I2 where the ZTV indicates that the stack would be visible. The fieldwork indicated and the photograph confirmed that this was not the case.

Night Time Landscape Sensitivity

- 3.47 Night time views of Gatwick and Crawley illustrate that there is not homogenous sensitivity to lighting across NCA 121 or CLCA LW8 (Figure R4 of my rebuttal proof of evidence). The lights of the Land North of Horsham development will have similar impact at night to that of Crawley and this future night time baseline will reduce the sensitivity of the landscape to the four aviation warning lights proposed at the Appeal Site.

Setting of Heritage Assets

- 3.48 In his visual assessment Mr Coomes references the settings of two heritage assets; St. Margaret's Church, Warnham (his paragraph 12.19) the stack "*will occur within the visual domain of a Grade 1 Listed Building which will, in my opinion, add detriment to its setting*"; and, Graylands Copse Moated Site, Scheduled Monument (SM) east of Langhurstwood Road (his paragraph 12.64) "*it will, in my opinion, add detriment to its setting*". The settings of historic monuments are different to views, as visual receptors are always people.
- 3.49 The impact on heritage features should only be assessed by historic environment consultants "*be dealt with in the cultural heritage topic of an EIA and not as part of the landscape and visual topic*" (GLVIA, page 93, Summary advice on good practice, fifth bullet point).
- 3.50 Historic England (HE) custodian of Listed Buildings and SMs, does not consider the development to impact on the setting of St. Margaret's Church. HE assesses the effect, of the current design of the 3Rs facility, on the Graylands Copse Moated Site SM as Low. It does not comment on the effects of the proposed development on Warnham Court Registered Park and Garden. Historic England does not object to the proposed development.

Comparison of RPS and EDCO Significance of Landscape Effects

- 3.51 For convenience I have set out the RPS and EDCO assessments of significance of landscape effects, updating and summarising the main points.
- 3.52 Where Mr Coomes has not commented on landscape receptor sensitivity, magnitude of landscape impact or significance of landscape effect, I have presumed that he agrees with my professional judgement on these matters.

Table 1: Comparison of RPS and EDCO Significance of Landscape Effects at Operational Phase

Landscape Resource	Significance of Landscape Effects		
	Sensitivity to Proposed Change	Magnitude of Impact (all long-term reversible impacts)	Overall Significance
South Downs National Park	RPS: High	RPS: Indirect Negligible impact (distance)	RPS: Negligible adverse
High Weald AONB (EDCO references RPS Viewpoint 4 to assess impact) (CD030, Chapter 5, Figure 5.12)	RPS: High EDCO: High	RPS: Indirect Negligible impact (distance and context) EDCO: Medium (day) High (night)	RPS: Negligible adverse EDCO: Moderate/Major
Surrey Hills AONB	RPS: High	RPS: Indirect Negligible impact (distance)	RPS: Negligible adverse
Warnham Court Registered park and Garden (EDCO references RPS Viewpoint 6 to assess impact) (CD030, Chapter 5, Figure 5.14)	RPS: High EDCO: High	RPS: Indirect Low impact (distance and context) EDCO: Medium (day) High (night)	RPS: Minor adverse EDCO: Moderate/Major
National Landscape Character Area 121: Low Weald	RPS: Medium	RPS: Direct Negligible impact (proportion of land area)	RPS: Negligible adverse

Significance of Landscape Effects			
Landscape Resource	Sensitivity to Proposed Change	Magnitude of Impact (all long-term reversible impacts)	Overall Significance
	EDCO: High	EDCO: High (day and night)	EDCO: Major/Substantial
County Landscape Character Area LW4: Low Weald Hills	RPS: Medium	RPS: Indirect impact. Not assessed as no likely significant effects	RPS: Not assessed as no likely significant effects
	EDCO: High	EDCO: High	EDCO: Major/Substantial
County Landscape Character Area LW8: Northern Vales	RPS: Medium	RPS: Direct Low impact (proportion of land area)	RPS: Minor adverse
	EDCO: High	EDCO: High	EDCO: Major/Substantial
District Landscape Character Area I2: Warnham and Rusper Wooded Ridge	RPS: High	RPS: Indirect impact Not assessed as no likely significant effects	RPS: Not assessed as no likely significant effects
	EDCO: High	EDCO: High	EDCO: Major/Substantial
District Landscape Character Area K2: Warnham and Faygate Vale	RPS: Low	RPS: Direct impact Medium (location within and proportion of land area)	RPS: Minor adverse
	EDCO: High	EDCO: High	EDCO: Major/Substantial
District Landscape Character Area P1: Upper Arun Valley	RPS: Medium	RPS: Direct impact Medium (location within and proportion of land area)	RPS: Moderate adverse*
	EDCO: High	EDCO: High	

Significance of Landscape Effects			
Landscape Resource	Sensitivity to Proposed Change	Magnitude of Impact (all long-term reversible impacts)	Overall Significance
			EDCO: Major/Substantial
Local Landscape Character Area 15: Warnham Brickworks	RPS: Low EDCO: Low	RPS: Direct impact Medium EDCO: Medium	RPS: Minor adverse EDCO: Minor

*If direct impact

Landscape Assessment Conclusions

- 3.53 The proposed 3Rs facility does not change the character of the landscape, as one waste management facility is being replaced with another waste management facility, within the same land area.
- 3.54 The character of LLCA 15: Warnham Brickworks in which the 3Rs facility is located will not be changed by the proposed development. The character of DLCAs K2: Warnham and Faygate Vale or the character of DLCA P1: Upper Arun Valley, will, similarly, remain unchanged by the presence of the 3Rs facility. The character of the adjoining and wider LLCAs, DCLAs, CLCAs and NCAs will also remain the same.
- 3.55 The EDCO assessment is not clear on the difference between assessing landscape effects and the assessment of visual effects. It is, the visual change that Mr Coomes is primarily concerned with.
- 3.56 The EDCO assessment of significance is not decisive. Many of the judgements on significance are 'either/or', e.g. the overall significance of landscape effects on NCA 121: Low Weald is Major/Substantial.

4 VISUAL ASSESSMENT METHODOLOGY

- 4.1 As with landscape effects, the assessment of visual effects requires methodical consideration.
- 4.2 In describing visual effects a range of issues have to be considered, set out at GLVIA paragraph 6.27 these include: the nature of the receptor's view of the proposed development; the proportion of the development visible; the distance of the viewer from the development; focus of view or a small part of a wider view; stationary or transient; nature of change, e.g. changes to skyline, creation of a new visual focus, or alteration of visual scale.
- 4.3 The Horsham District Local Landscape Capacity Assessment (CD104) areas (LLCAs) have been overlaid on the Horsham District Landscape Character Assessment (CD108) areas (DCLAs) and coloured with visual sensitivity to large-scale employment (Figure R2). This is a generic visual sensitivity and the effects will change dependent on the receptor type and the development. However, it illustrates that there are different degrees of visual sensitivity throughout the DCLAs, dependent on amount of visual screening.

Viewpoint Locations

- 4.4 The locations of Representative Viewpoints 1 to 29 were agreed with WSCC's Planning and Landscape officers, as detailed in CD029, Chapter 5, Table 5.4. The Landscape Officers at both WSCC and HDC agreed with the methodology and the conclusions reached (CD071, paragraph 9.32). Although the agreed photographs were sufficient to undertake the assessment of visual effects, additional viewpoints were taken when access to the Andrew's Farm properties was gained and are included in the Appendices to my proof of evidence. Further photographs were taken and assessed at the request of, and on the behalf of, Ni4H (Table 6 of my proof of evidence. These were not considered to be necessary by WSCC, HDC or RPS. GLVIA notes that accessibility to the public is a factor in choosing viewpoints (GLVIA, paragraph 6.20) and no private locations were chosen by the relevant authorities as representative viewpoints.

Sensitivity of Visual Receptors

- 4.5 It is important to remember that visual receptors are always people (GLVIA, paragraph 6.31). As with landscape sensitivity the susceptibility of the receptor to the proposed change and the value attached to views has to be assessed.
- 4.6 For reference the RPS definitions of visual receptor sensitivity are in CD029, Chapter 5, Table 5.1, page 5-13. The DMRB definitions are at IAN Annex 2, Table 1, page 41, of Appendix 8 to my proof of evidence.

Susceptibility of Visual Receptors to Change

- 4.7 The susceptibility of different receptors is a function of the activity of the person experiencing the views and the extent which their attention or interest is focussed on views at particular locations (GLVIA, paragraph 6.32).
- 4.8 Those visual receptors most susceptible to change are set out in paragraph 6.33 of the GLVIA, these include residents and users of public rights of way. Paragraph 6.34 gives examples of receptors that are less likely to be susceptible to change, these include people engaged in outdoor sport that does not involve an appreciation of the views and people at their places of work, whose attention is focussed on their work. The DMRB includes users of main roads and passengers on public transport in this lower susceptibility (see paragraph 8.126 of my proof of evidence).
- 4.9 Mr Coomes has used various receptor sensitivities that are not consistent with either GLVIA or DMRB definitions, on which the RPS definitions are based.

Value Attached to Views

- 4.10 Judgements about value should take account of the recognition of particular views, e.g. at heritage assets or through planning designations. Indicators of value could be appearance of the view in guidebooks, indicated as a viewpoint on a map, or references in art or literature to a particular view. No views with such indicators or recognition lie close to the site. If there were such views, they would have been chosen as representative viewpoint locations, by WSCC/HDC/RPS, such as Viewpoint 11 (CD030, Figure 5.19) Leith Hill Tower within the Surrey Hills AONB.

Magnitude of Visual Impacts

- 4.11 As with landscape impacts, the visual effects need to be evaluated in terms of size or scale, geographical extent and duration and reversibility.
- 4.12 For reference, the RPS definitions of visual magnitude of impact are in CD029, Chapter 5, Table 5.2, page 5-14). The DMRB definitions are at IAN Annex 2,

Size or scale

Scale of Change

- 4.13 This includes the scale of change, i.e. loss or addition of features in a view, as well as the proportion of the view occupied by the proposed development (GLVIA paragraph 6.39, first bullet point). This analysis is particularly relevant in relation to views where the Land North of Horsham features, particularly in views from the High Weald AONB, of which Viewpoint 4 (CD030, Chapter 5, Figure 5.12) is an example. Mr Coomes acknowledges that the scale of change is small in some viewpoints, e.g. his paragraphs 12.5 (Viewpoint 3, Chapter 5, Figure 5.11) 12.10 (Viewpoint 4, Chapter 5, Figure 5.12) and 12.14 (Viewpoint 6, Figure 5.24) of his proof of evidence.

Contrast

- 4.14 The degree of contrast with existing landscape features in terms of form, scale and mass, line, height, colour and texture, should be noted. The 'fit' of the 3Rs facility into its landscape context is described in paragraphs 5.3 to 5.11 of my proof of evidence.

Nature of View

- 4.15 The relative time over which the view will be experienced, and whether the view will be full, partial or glimpses.

Geographical Extent

- 4.16 The geographical extent of a view should be noted. This will include: the angle of view; the distance of the viewer to the proposed development; and the extent of the area over which the changes will be visible (GLVIA, paragraph 6.40).

Duration and Reversibility

- 4.17 The impact of the 3Rs facility is considered to be long-term. However, this is dependent on the advances in technology. The 3Rs facility is considered to be reversible (GLVIA paragraph 6.41).

Significance of Visual Effects

- 4.18 The sensitivity of the visual receptors to the development, have been combined sequentially with the magnitude of the visual impact to give overall significance. The effect should then be assessed as to whether it is significant or not (GLVIA, paragraphs 6.42 and 6.43).
- 4.19 For reference RPS definitions of significance of visual effects are set out in CD029, Chapter 5, paragraph 5.3.18. The DMRB definitions of significance of visual effects are set out in IAN Annex 2, Table 4, page 46 (Appendix 8 to my proof of evidence).
- 4.20 Where Mr Coomes has not made a judgement on visual receptor sensitivity, magnitude of visual impact or significance of visual effect, I have presumed that he agrees with my professional judgement.

Table 6: Comparison of RPS and EDCO Significance of Visual Effects at Operational Phase

Visual Receptor	Significance of Visual Effects		
	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Residential Receptors			
Properties on the northern section of Langhurstwood Road, north-north-east of the site (EDCO Group 1)	RPS: High	RPS: Not assessed as given the amount and proximity of mature trees and the presence of the landfill the effects are unlikely to be significant	RPS: Not assessed as given the amount and proximity of mature trees and the presence of the landfill the effects are unlikely to be significant
Graylands Lodge and South Lodge, north-east of the site (EDCO Group 2)	RPS: High	RPS: Not assessed as given the amount and proximity of mature trees and the presence of the landfill the	RPS: Not assessed as given the amount and proximity of mature trees and the presence of the landfill

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
		effects are unlikely to be significant	the effects are unlikely to be significant
Properties to the south of the access road to the Wealden Brickworks site, east of the site (EDCO Group 3)	RPS: High EDCO: High	RPS: Low to Medium EDCO: RPS assessment may underestimate the impact of the stack	RPS: Minor to Moderate adverse
Properties in and around Holbrook, east and south-east of the site (EDCO Group 4)	RPS: High	RPS: Negligible	RPS: Minor adverse
Group of Properties at Graylands Farm, Langhurstwood Road, south-east of the site (EDCO Group 5)	RPS: High	RPS: Negligible	RPS: Minor adverse
Properties on the southern part of Langhurstwood Road, south-south-east of the site (EDCO Group 6)	RPS: High	RPS: Negligible	RPS: Minor adverse
Northern edge of Horsham, south-south-east of the site (EDCO Group 7)	RPS: High	RPS: Not assessed as given the amount of built development and mature trees the effects are unlikely to be significant	RPS: Not assessed as given the amount of built development and mature trees the effects are unlikely to be significant
Station Road Cottages and properties on Mercer Road, south of the site (EDCO Group 8)	RPS: High	RPS: Low (Station Road Cottages) to Medium (Mercer Road properties)	RPS: Minor adverse (Station Road Cottages) to Moderate adverse (Mercer Road properties)

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
(EDCO references RPS Viewpoint 16 to assess visual impact on properties on Mercer Road) (CD030, Chapter 5, Figure 5.24)	EDCO: High	EDCO: Properties on Mercer Road Medium or possibly Medium/High.	
Properties to the south-east of Great Daux roundabout, south of the site (EDCO Group 9)	RPS: High	RPS: Not assessed as given the amount mature trees within the golf course and either side of the A264 the impact would be insignificant	RPS: Not assessed as given the amount of mature trees the effects are unlikely to be significant
Warnham Court and properties at Goosegreen, south-west of the site (EDCO Group 10)	RPS: High	RPS: Negligible	RPS: Minor adverse
Group of properties at Westons Place and Westons Farm, south-west of the site (EDCO Group 11)	RPS: High	RPS: Negligible	RPS: Minor adverse
Group of properties at Andrews Farm, Station Road, west-south-west of the site (EDCO Group 12)	RPS: High EDCO: High	RPS: Medium EDCO: Full view of stack - may be High	RPS: Moderate adverse to Major adverse
(EDCO references RPS Viewpoint 14 to assess impact) (CD030, Chapter 5, Figure 5.22)			
Properties at Knob Hill Corner, Warnham, west-south-west of the site (EDCO Group 13)	RPS: High EDCO: High	RPS: Low to Medium	RPS: Minor adverse to Moderate adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
		EDCO: Stack clearly visible - may be Medium	
Properties to the west of the A24, north of Warnham, west of the site (EDCO Group 14)	RPS: High EDCO: High	RPS: Long-term reversible EDCO: Stack visible – could be Medium	RPS: Minor adverse
Properties on high land to the east of the A24, west-north-west of the site (EDCO Group 15)	RPS: High EDCO: High	RPS: Long-term reversible EDCO: Stack likely to be visible - Medium	RPS: Minor adverse
Properties on either side of Mayes Lane, north west of the site (EDCO Group 16)	RPS: High	RPS: Long-term reversible	RPS: Minor adverse
Properties on either side of the A24, north-north-west of the site (EDCO Group 17)	RPS: High	RPS: Long-term reversible	RPS: Minor adverse
Kingsfold, north of the site (EDCO Group 18)	RPS: High	RPS: Negligible	RPS: Minor adverse
Residents at Graylands	RPS: High EDCO: High	RPS: Not assessed as given the amount of built development and mature trees around the prospective units the effects are unlikely to be significant EDCO: Views of stack likely to be Moderate	RPS: Not assessed as given the amount of built development and mature trees around the prospective units the effects are unlikely to be significant
Residents on higher ground south of Horsham, e.g. Tower Hill	RPS: High	RPS: Not assessed as unlikely to be significant due to	RPS: Not assessed as unlikely to be significant due to

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
	EDCO: High	distance and intervening vegetation EDCO: Likely to have views of stack – not possible to assess impact	distance and intervening vegetation
Public Rights of Way			
Promoted Paths	RPS: High and Very High (South Downs National Trail)	RPS: Negligible	RPS: Minor adverse
Public footpaths 1574-1 and 1574-2 (EDCO references RPS Viewpoint 14 to assess impact) (CD030, Chapter 5, Figure 5.22)	RPS: High EDCO: High	RPS: Negligible and Medium EDCO: High (building and stack)	RPS: Moderate adverse to Major adverse (1574-1) and Minor adverse (1574-2)
Public bridleways 1570-1 and 1570-2	RPS: High	RPS: Negligible	RPS: Minor adverse
Public footpaths 1425-2, 1489-2 and 1489-3	RPS: High	RPS: Negligible	RPS: Minor adverse
Public footpath 1573-1 (EDCO references RPS Viewpoint 20 to assess impact) (CD030, Chapter 5, Figures 5.28)	RPS: High EDCO: High	RPS: Negligible EDCO: High (stack)	RPS: Minor adverse
Public footpath 1421-2	RPS: High EDCO: High	RPS: Low EDCO: High (stack)	RPS: Minor adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
(EDCO references RPS Viewpoints 23 to 26 to assess impact) (CD030, Chapter 5, Figures 5.31 to 5.34)			
Public footpath 1575-1	RPS: High	RPS: Negligible	RPS: Minor adverse
Public footpaths 1577-2 and 1578-1 (EDCO references RPS Viewpoint 6 to assess impact) (CD030, Chapter 5, Figure 5.14)	RPS: High EDCO: High	RPS: Low EDCO: 1577-2 Medium/High (stack)	RPS: Minor adverse
Public footpaths 1420-1 and 1426-1	RPS: High	RPS: Negligible	RPS: Minor adverse
Roads and Railways			
Arterial Roads: A24 and A264 (EDCO references RPS Viewpoint 29 to assess impact on south-bound A24) (CD030, Chapter 5, Figure 5.37) (EDCO references RPS Viewpoint 13 to assess impact on north-bound A24) (CD030, Chapter 5, Figure 5.21) Note: RPS Viewpoint 12 (CD030, Chapter 5, Figure 5.20) should also be used to assess	RPS: Low	RPS: Low to Medium EDCO: High (south-bound on the A24) (day and night). Medium (on the north-bound A24) (day) and medium/high (night)	RPS: Minor adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
impact on north-bound A24)			
Station Road and Mercer Road (EDCO references RPS Viewpoint 14 to assess impact on north-bound A24) (CD030, Chapter 5, Figure 5.22)	RPS: Low	RPS: Medium (Station Road) to Negligible (Mercer Road) EDCO: High (Station Road)	RPS: Minor adverse (Station Road) to Negligible adverse (Mercer Road)
Old Holbrook/Northlands Road and Rusper Road/Hurst Hill	RPS: Low	RPS: No Change to Negligible	RPS: No Effect to Negligible adverse
Knob Hill	RPS: Low	RPS: Low	RPS: Minor adverse
Mayes Lane and Threestiles Road	RPS: Low	RPS: Low	RPS: Minor adverse
Passengers using the Dorking to Horsham railway line	RPS: Medium	RPS: Medium	RPS: Moderate adverse
Industrial and Commercial Premises			
Weinerberger Brickworks and Biffa Waste Services	RPS: Low	RPS: Medium	RPS: Minor adverse
Graylands business units (employees and visitors)	RPS: Low and Medium	RPS: No Change to Negligible	RPS: No Effect to Negligible adverse
Fisher Clinical Services	RPS: Low	RPS: No Change	RPS: No Effect
Kam Trucking, Greens of Horsham and Panel2Paint employees and customers)	RPS: Low and Medium	RPS: Low	RPS: Negligible adverse to Minor adverse
Denhams Auction Site (employees and customers)	RPS: Low and Medium	RPS: Low	RPS: Negligible adverse to Minor adverse
Land North of Horsham			

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
<p>Residential areas, cemetery, allotments and public open space</p> <p>(EDCO references RPS Viewpoint 21 to assess impact on the cemetery) (CD030, Chapter 5, Figure 5.29)</p> <p>(EDCO references RPS Viewpoint 22 to assess impact on the allotment) (CD030, Chapter 5, Figure 5.30)</p> <p>(EDCO references RPS Viewpoint 24 to assess impact on the school) (CD030, Chapter 5, Figure 5.32)</p> <p>(EDCO references RPS Viewpoint 3 to assess impact on the Greenway/community uses) (CD030, Chapter 5, Figure 5.11)</p> <p>(EDCO references RPS Viewpoint 23 to assess impact on the link road) (CD030, Chapter 5, Figure 5.31)</p>	RPS: High (residential areas, cemetery, allotments and public open space)	<p>RPS: Negligible and Low</p> <p>EDCO: High (cemetery, allotments, school). Medium (day) (community users and Green way) High (night). High (vehicles on link road) (stack)</p>	RPS: Minor adverse
Representative Viewpoints			
Viewpoint 1 – Public Footpath north of Friday	RPS: High	RPS: Negligible	RPS: Minor adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Farm, 2.8 km to the north of site		EDCO: Lights at night would be visible	
Viewpoint 2 – Public Footpath south of Old Park Farm, 2.6 km to the north-east of site	RPS: High	RPS: No Change	RPS: No Effect
Viewpoint 3 – Public Footpath at Moathouse Farm, 1.6 km east of site	RPS: High EDCO: High	RPS: Negligible EDCO: Medium (day) and High (night) (stack)	RPS: Minor adverse EDCO: Moderate/Major (day) and Major/Substantial (night)
Viewpoint 4 – Public Footpath at Roffey Park, 3.9 km to the east of site	RPS: High EDCO: High	RPS: Low EDCO: Medium (day) and High (night) (stack)	RPS: Minor adverse EDCO: Moderate/Major (day) and Major/substantial (night)
Viewpoint 5 – Public Footpath at Ashlands Farm, 4.9 km to the south-west of site	RPS: High	RPS: No Change	RPS: No Effect
Viewpoint 6 – Public Footpath at Warnham Court RPaG, 1.1 km to the south-east of site	RPS: High EDCO: High	RPS: Low EDCO: Medium /High (day) and High (night)	RPS: Minor adverse
Viewpoint 7 – Churchyard of St. Margaret’s Church, Church Street, Warnham, 1.3 km to the south-west of the site	RPS: High EDCO: High	RPS: Negligible EDCO: Medium/High (day) and High (night) (stack)	RPS: Minor adverse EDCO: Moderate/Major (day) and Major/substantial (night)
Viewpoint 8 – Warnham Conservation Area at the Cricket Ground, 1.6 km south-west of the site	RPS: High	RPS: No Change	RPS: No Effect
Viewpoint 9 – Public Footpath at Mayes Park	RPS: High	RPS: Negligible	RPS: Minor adverse

Visual Receptor	Significance of Visual Effects		
	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Farm, 1.5 km to the west of site		EDCO: Lights at night would be visible	
Viewpoint 10 – Horsham Road, 4.7 km to the west of site	RPS: Low	RPS: Negligible	RPS: Negligible adverse
Viewpoint 11 – Leith Hill Tower, Surrey Hills AONB, 9.2 km to the north of site	RPS: Very High	RPS: Negligible	RPS: Minor adverse
Viewpoint 12 – Great Daux Roundabout, 1 km to the south-west of site	RPS: Low	RPS: Negligible EDCO: Lights at night would be visible	RPS: Negligible adverse
Viewpoint 13 – Layby on the A24, 1.3 km to the south-south-west of the site	RPS: Low EDCO: Low	RPS: Medium EDCO: Medium (day) Medium/High (night) (buildings and stack)	RPS: Minor adverse EDCO: Minor/Moderate
Viewpoint 14 – Station Road/footpath 1574-1, 650 m to the south west of the site	RPS: High (pedestrians) and Low (vehicles) EDCO: High (pedestrians, cyclists, horse riders and people in vehicles)	RPS: Medium EDCO: High (pedestrians, cyclists, horse riders and people in vehicles) (building and stack)	RPS: Moderate adverse to Major adverse (pedestrians) and Minor adverse (vehicles) EDCO: Major/Substantial (pedestrians) and moderate/Major (people in vehicles)
Viewpoint 15 – Rear of Station Road Cottages, 270 m to the south of the site	RPS: High (residents) and Low (employees)	RPS: Low	RPS: Minor adverse (residents) to Negligible adverse (employees)
Viewpoint 16 – Entrance to Warnham Station/footpath 1574-2,	RPS: High (pedestrians and residents)	RPS: Low	RPS: Minor adverse (pedestrians) and Negligible adverse

Visual Receptor	Significance of Visual Effects		
	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Mercer Road, 330 m to the south of the site	and Low (people in vehicles and employees)		(people in vehicles and employees)
	EDCO: High (pedestrians and residents) and Low (people in vehicles and employees)	EDCO: Medium (day) and High (night) (residents and pedestrians. Low (day) and Medium (night) (people in vehicles and employees) (stack)	EDCO: Moderate/Major (day) and Major/substantial (night) (pedestrians). Negligible Minor (people in vehicles and employees)
Viewpoint 17 – Mercer Road/footpath 1574-2, 330 m to the south-south-east of the site	RPS: High (pedestrians) and Low (people in vehicles)	RPS: Low	RPS: Minor adverse to Moderate adverse (pedestrians) and Negligible adverse (people in vehicles and employees)
	EDCO: High (pedestrians) and Medium (people in vehicles)	EDCO: Low (day) and Medium (night) (pedestrians). Low (day) and Medium (night) (people in vehicles) (stack)	EDCO: Minor/Moderate (day) and Moderate/Major (night) (pedestrians). Minor (day) and Moderate (night) (people in cars and employees)
Viewpoint 18 – Moated site to the east of Langhurstwood Road (POS within LNoH) 270 m to the east of the site	RPS: High	RPS: Negligible	RPS: Minor adverse
Viewpoint 19 – Southern entrance drive to Graylands, 480 m to the north-east of the site (single carriage way,	RPS: Low	RPS: Low	RPS: Minor adverse
	EDCO: High (pedestrians and cyclists)	EDCO: High (pedestrians and cyclists) and Low	EDCO: Major/Substantial (pedestrians and

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
one-way, easterly direction, no pavements)	and Medium (people in vehicles)	(people in vehicles) (day and night) (stack)	cyclists). Negligible (people in vehicles)
Viewpoint 20 – Northern exit drive from Graylands, 560 m to the north-east of the site (single carriage way, one-way, westerly direction, public footpath 1573-1)	RPS: High (pedestrians) and Low (vehicles) EDCO: High (pedestrians and cyclists) and Medium (people in vehicles)	RPS: Negligible EDCO: High (pedestrians and people in vehicles) (day and night) (stack)	RPS: Minor adverse (pedestrians) and Negligible adverse (vehicles) EDCO: Medium (pedestrians). Moderate (people in vehicles):
Viewpoint 21 – Field south of Graylands (cemetery within LNoH) 610 m north-east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 22 – Field east of moated site (close to land proposed as allotments within LNoH) 600 m east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 23 – Footpath 1421-2 (edge of residential/landscape buffer within LNoH) 800 m to the south-east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 24 – Footpath 1421-2 (a green way, adjacent to a school site within LNoH) 740 m to the east-south-east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial

Visual Receptor	Significance of Visual Effects		
	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Viewpoint 25 – Footpath 1421-2 west of Morris' Farm, 840 m to the east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 26 – Footpath 1421-2 north west of Morris' Farm, 900 m to the east-north-east of the site	RPS: High EDCO: High	RPS: Low EDCO: High (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 27 – Rusper Road/Hurst Hill, 2 km to the east of the site	RPS: Low	RPS: No Change	RPS: No Effect
Viewpoint 28 – Footpath 1489-2, east of Kingsfold, 2.1 km north of the site	RPS: High EDCO: High	RPS: Negligible EDCO: High (day and night) (building and stack)	RPS: Minor adverse EDCO: Major/Substantial
Viewpoint 29 – View from A24, immediately to the south of Kingsfold, 2 km from the site	RPS: Low EDCO: High (cyclists) and Medium (people in vehicles)	RPS: Low EDCO: High (for cyclists and people in vehicles) (day and night) (stack)	RPS: Minor adverse EDCO: Major/Substantial (cyclists). Moderate/Major (people in vehicles)
Viewpoint 30 – Private view from group of properties at Andrew's Farm, 530 m to 570 m to the west of the Appeal Site	RPS: High	RPS: Negligible to Medium	RPS: Minor to Moderate adverse (revised significance after gaining access to these properties)
Viewpoint 31 – View from track to the waste water treatment works and Station Road, 428 m to the south-west of the Appeal Site	RPS: Low	RPS: Low	RPS: Minor adverse
Viewpoint 32 – View from within a field on	RPS: Low	RPS: Low	RPS: Minor adverse

Visual Receptor	Significance of Visual Effects		
	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
Knob Hill Road, 913 m to the west-south-west of the Appeal Site			
Viewpoint 33 – View from Warnham Common (north) 1.19 km to the west-south-west of the Appeal Site	RPS: High	RPS: No Change	RPS: No Effect
Viewpoint 34 – View from Warnham Common (central) 1.22 km to the west-south-west of the Appeal Site	RPS: High	RPS: Negligible	RPS: Minor
Viewpoint 35 – View from junction of Cider Mill Farm entrance and Threestiles Road, 1.47 km from the Appeal Site	RPS: Low	RPS: Negligible	RPS: Negligible
Viewpoint 36 – View from Tillets Lane south of the junction with Threestiles Road, 1.58 km from the Appeal Site	RPS: Low	RPS: Negligible	RPS: Negligible
Viewpoint 37 – View from Pound Corner, 1.63 km to the west of the Appeal Site	RPS: Low	RPS: No Change	RPS: No Effect
Viewpoint 38 – View from junction of drive to Mayes Park House and Mayes Lane, 1.56 km to the west-north-west of the Appeal Site	RPS: Low	RPS: No Change	RPS: No Effect
Ni4H Viewpoints			
Ni4H Viewpoint 1 –, Field gate on the A24, south of Kingsfold, 1.8	RPS: Low	RPS: Negligible	RPS: Negligible adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
km north-north-west of the Appeal Site			
Ni4H Viewpoint 2 – Private view from the eastern boundary of the garden at Old Manor, Warnham adjacent to solar panels) 1.1 km west of the Appeal Site	RPS: High	RPS: Low	RPS: Moderate adverse
Ni4H Viewpoint 3 – View from junction of drive to Old Manor and Threestiles Road, 1.2 km west of the Appeal Site	RPS: Low	RPS: Low	RPS: Minor adverse
Ni4H Viewpoint 4 – View from the north-bound platform at Warnham Station, 173 m to the south of the Appeal Site	RPS: Low (employees) Medium (passengers)	RPS: Low	RPS: Minor adverse
Ni4H Viewpoint 5 – View from 7 th fairway of Rookwood golf course, 1 km to the south of the Appeal Site	RPS: Medium	RPS: Low	RPS: Minor adverse
Ni4H Viewpoint 6 – View from junction of Pondtail Drive and Chaffinch Close, 900 m to south-east of the Appeal Site	RPS: Medium (pedestrians using the pavement)	RPS: Low	RPS: Minor adverse
Ni4H Viewpoint 7 – View from field gate west of junction of Parthings Lane and Tower Hill, 4.6 km to the south-south-west of the Appeal Site	RPS: Low	RPS: No Change	RPS: No Effect
Ni4H Viewpoint 8 – View from field gate east of	RPS: Medium (pedestrians)	RPS: Negligible	RPS: Minor adverse

Significance of Visual Effects			
Visual Receptor	Visual Receptor Sensitivity	Magnitude of Visual Impact (all Long-term Reversible)	Significance of Visual Effect
junction of Parthings Lane and Tower Hill, 4.6 km to the south-south-west of the Appeal Site	using a small section of pavement)		
Ni4H Viewpoint 9 – View from public right of way 1663 at Denne Hill, 4.5 km to the south-south-west of the Appeal Site	RPS: High	RPS: Negligible	RPS: Minor adverse
Night Time Views			
All receptors	RPS: Various	RPS: Negligible to Low	RPS: Negligible adverse to Minor adverse

Table Note

Overestimation of Sensitivity and Impact Magnitude

- 4.21 Mr Coomes over-estimates the sensitivity and the impact magnitude of several receptor types, and example of this is people travelling in vehicles, e.g. at Viewpoint 13, this should be contrasted with the DMRB (see paragraph 8.126 of my proof of evidence) and the letter from Horsham District Council of the 1st May 2018 (CD043, page 4, second paragraph) “*Some medium to long distance views are available into the site, due to the rise in the topography and large size of the building, however these are not considered significant for the Environmental Statement purposes. Additional viewpoints have been provided to illustrate views from the A24 (viewpoint 13). The users of the A24 will travel at a fast pace and their primary attention is on the road not the landscape, therefore this is likely to be not significant for the purposes of the Environment Statement*”.
- 4.22 Another example is where Mr Coomes assesses the sensitivity of vehicle users travelling along Station Road as High and the magnitude of impact as High, despite the receptors being in a car and only catching a fleeting glimpse through a gateway.

Indecisive Assessments of Magnitude of Impact and Significance of Effect

- 4.23 The EDCO assessment of significance is not decisive. Many of the judgements on significance are 'either/or', e.g. the overall significance of visual effects experienced by visual receptors at Viewpoint 24 is Major/Substantial.

Land North of Horsham

- 4.24 In relation to RPS Viewpoint 23 (CD030, Chapter 5, Figure 5.31) and others located in the land to the East of Langhurstwood Road, Mr Coomes correctly identifies that the location will be part of the Land North of Horsham Development, within a residential area/on the link road between two residential areas (it will not be a rural, public right of way). However, the development will both change the context of the view and reduce the available views (see paragraphs 8.76 to 8.93 of my proof of evidence).

Views of the Plume

- 4.25 The plume is included in five of the visualisations, as explained at paragraphs 8.52 and 8.53 of my proof of evidence. The description of the plume is summarised at paragraph 5.8.10 of CD029, Chapter 5. The effects of the plume are set out at paragraph 5.8.82 of Chapter 5.

Spread Effects of Gatwick Airport

- 4.26 Mr Coomes states that the red aviation warning lights on the stack which will *"fuel potential anxieties in the receptors' minds about the spread effect of Gatwick Airport which is a concern expressed in the LCAs"* in his response to several Viewpoints in his proof of evidence, e.g. paragraph 12.72. The concerns of people's minds about the spread of Gatwick Airport resulting from visual impacts are not mentioned in any of the Landscape Character Area descriptions. This statement is incorrect and if true is not a landscape and visual matter, but a health matter.

Aerial Perspective

- 4.27 In his proof of evidence, Mr Coomes refers to a layering up of horizons (e.g. his paragraphs 6.26 and 8.26) multiple horizons (e.g. his paragraphs 6.28 and 8.63). There is only one horizon. He also refers to a 'blue' horizon (paragraph 12.100).

4.28 Mr Coomes appears to be referring to aerial perspective where, due to dust particles and moisture in the atmosphere, receding layers of landform appear more uniform and more blue. This is a temporary effect as the dust is cleared between showers and visibility good at intervals of high pressure (page 50 and figure 1 on page 51, of Appendix 3 to my rebuttal proof of evidence). The frequent changes in the British weather change the light and depth of view as illustrated on pages 51 to 53 of Appendix 3 to my rebuttal proof of evidence). Mr Coomes has assessed the visual effects of the stack in one weather type only.

Zone of Theoretical Visibility

4.29 A Zone of Theoretical Visibility (ZTV) only shows land from which the proposal may **theoretically** be visible (GLVIA, Summary of good practice, page 117, third bullet point). As Mr Coomes will be aware, a ZTV only indicates, theoretically, that part of the building and/or stack is visible, however small, not that all of the building or stack is all visible. Fieldwork must be undertaken to enable an accurate assessment of impact magnitude to be made (GLVIA, Summary of good practice, page 117, fourth bullet point) (see paragraph 3.46 of my rebuttal proof of evidence).

4.30 I note that Mr Coomes has not generated a ZTV and has not visited all of the viewpoints or in the LVIA (CD029, Chapter 5, and illustrated in Figures 5.7 to 5.37 of CD030). He offers an, often inconclusive, opinion of visual impact for the RPS representative viewpoints, that he has not visited and that he has commented on.

Development in the Centre of Views

4.31 Mr Coomes comments that the stack is in the middle of the view, for example at his paragraph 12.13 (Viewpoint 6, RPS Figure 5.14) and his paragraph 12.16 (Viewpoint 7, RPS Figure 5.15). The proposed development should always be the focus of photographs and visualisations. There are always other views available, that do not include the proposed development. Often the view of a proposed development is through a field gate/a gap in woodland, or, is not in the main direction of travel, e.g. Viewpoint 6, which is at right angles to the north-west to south-east direction of the footpath. Representative viewpoints illustrate the 'worst-case', not general views.

4.32 Another example that Mr Coombes gives of the stack being in the centre of the view is Viewpoint 26, this is a view west from a north-south orientated public right of way. The photograph is at 90° to the public footpath to ensure the proposal is in the centre of the view, however, the long views are directly south, following the alignment of the footpath and the stack does not feature in these views. Viewpoint C25, Figure R5 (directly south from Graylands) of my rebuttal proof of evidence more accurately portrays the views that walkers would enjoy travelling down the slope the stack would not feature in this view). The development of the 3Rs facility will not cause the loss of landscape elements or features or characteristics will be lost in this view.

De-scale Views

4.33 Mr Coomes uses the expression to de-scale views in regard to the proposed stack, e.g. at paragraph 12.10 of his proof of evidence, in describing effects of RPS Viewpoint 4 (CD030, Chapter 5, Figure 5.12). The stack is a tall, slim feature and will be coloured grey. However, it will be seen in different weather conditions and at different times of the day, where the grey colour will appear pale in some views and dark in others. In some views the effect is exaggerated by the aerial perspective simplifying the background views (paragraph 4.27 and 4.28 of my rebuttal proof).

4.34 Adding to the observations in paragraph 4.32, above, many long views in the locality area available, where the stack would not be visible, an example of this is landscape character Viewpoint C25 (Figure R5 of my rebuttal proof of evidence) the view south from Graylands.

4.35 Paragraphs 5.7 to 5.10 of my proof of evidence describe the 'fit' of the proposed building and stack in its landscape context.

Proportion of View

4.36 While Mr Coomes considers that the stack is only a small proportion of a view, e.g. his paragraph 12.10. Mr Coomes refers to the building as having an affect on a 'very large' proportion of some views, e.g. Viewpoint 14 (Mr Coomes' paragraph 12.25). In fact, the proportion of the 75° field of view is approximately 8% or 6°.

Integration in the Landscape

- 4.37 Mr. Coomes claims that the stack is “*completely unintegrated with the landscape*” in several places within his proof, for example at his paragraph 12.67 in relation to RPS Viewpoint 23 (CD030, Chapter 5, Figure 5.31). This is not an accurate statement, as the whole stack would be visible if it were the case.

Verified Views – RPS methodology

- 4.38 As well as calling into question the methodology for the ZTV (although not presenting his own) Mr Coomes remarks that the photomontages are not verifiable. I present a simplified version of the process undertaken to generate the photomontages used in the LVIA (CD030, Figures 5.9 to 5.39 and my proof of evidence, Figure P3) at Figures R8 to R12 of this rebuttal proof.

EDCO Photography and Visualisations

Photography

- 4.39 Mr Coomes has presented little evidence of having followed the methodology at his Appendix 14. I make the following observations with regards to his photography and visualisations.
- Assuming that photographs A to O in his Appendix 9 and the night time photography in his Appendix 13 are single frame photographs, the photographs produced show a wider field of view per frame than a fixed/prime 50 mm lens. This does not follow Landscape Institute guidelines.
 - Figure 3, on page 4 of DC Appendix 14 is a photograph with data provided by CD Surveys, who were contracted to undertake the survey of each viewpoint (Appendix 14, page 5, paragraph 1). Note that the data on the photograph states that this photograph only has a 65.5° field of view and a focal length of 28 mm (following industry guidelines, images should show a 75° field of view and be taken using a 50 mm fixed lens).
 - Appendix 14, page 3, paragraph 3.1, states that digital images may vary slightly in size. However, if the image is taken on a camera with a fixed focal length lens the image size should be identical.
 - There is no photographic record of surveying equipment or tripod, barring Figure 1, page 2 of Appendix 14.

- Not all of the viewpoints on the map at Mr. Coomes Appendix 10 are located correctly, which points to surveying errors. Most are located on private land.
- I presume the night time visualisations were produced by Paul Drew Architects (paragraph 5.1, page 7, DC Appendix 14).

Presentation of Photography Viewpoints

- 4.40 The GLVIA sets out the information required on Figure 6.7 (page 110). The photographs in Mr Coomes Appendix 9, lack a title, direction of the view, distance from the Appeal Site; state what size they should be printed out at and what distance they should be viewed from. This is not necessarily required for character photographs, but, is required for photographs used to comment on views.

Visualisations

- 4.41 Mr Coomes has not undertaken any daytime visualisations. He has undertaken three night time visualisations. He states that these are verified, but does not provide evidence, or of the specification of the aviation warning lights used in his Appendix 13.
- 4.42 The agreement with Gatwick Safeguarding (referred to in my proof of evidence at paragraph 8.64) states that only the uppermost lights are required on the stack (letter from Gatwick Airport of the 13th January 2017, Appendix 2 to my Rebuttal Proof). Therefore, the visualisations in Mr Coomes Appendix 13 are not an accurate representation of night time effects.

5 PRINCIPLE OF DEVELOPMENT

- 5.1 Mr Coomes does not appear to accept the allocation of the Appeal Site as a location for a built waste management facility.
- 5.2 Mr Coomes very briefly mentions the 3Rs facility building, the exceptions being his paragraphs 14.19 to 14.20 and 14.28). He considers that the main adverse effects are caused by the stack.
- 5.3 At his paragraph 6.124, Mr Coomes states that *“any vertical object introduced into such a key, mid-escarpment location steps on hallowed ground, or in terms of GLVIA has no integration with the landscape that is there.”* It is evident that it is not just the height of the stack Mr Coomes objects to, it is any stack.

6 SUMMARY AND CONCLUSIONS

- 6.1 As highlighted in section 1 of this rebuttal proof of evidence, my silence on any particular point in the submitted proofs evidence should not be taken as agreement with it.
- 6.2 My evidence assesses the existing landscape and visual resources and receptors, using a transparent and thorough process. By contrast Mr Coomes has chosen to ignore the assessment procedures outlined in the Third Edition of the Guidelines for Landscape and Visual Impact Assessment (Landscape Institute and Institute of Environmental Management and Assessment, 2013) as well as other published guidance on landscape and visual impact assessment.
- 6.3 Mr Coomes has followed his own methodology, which confuses the effects on landscape character with visual effects. His assessment methodology has diverged from the usual definitions of sensitivity, magnitude and significance. In so doing Mr Coomes' assessment of the effects on landscape and visual resources and receptors is not thorough, transparent or accurate. His assessments of both landscape and visual effects, where he gives them, are exaggerated.
- 6.4 The proposed 3Rs facility does not change the character of the landscape. One waste management facility is being replaced with another waste management facility, within the same land area.
- 6.5 It is, in fact, the visual change Mr Coomes is concerned with, and of that visual change it is the stack that he is most concerned with.
- 6.6 Mr Coomes is resistant to any change in the landscape rather than acknowledging that landscape change is an acceptable and ongoing process. Despite the Appeal Site being an allocated site, in the Development Plan, for a built waste management facility with a stack. Mr Coomes appears to be opposed to the principle of any stack in this location, as he makes no judgement as to what might be visually acceptable.
- 6.7 With regard to unbiased professional judgement the GLVIA explains that it *"is a very important part of LVIA especially for complex projects, more than one person should be involved in the assessment to provide checks and balances, especially in identifying the significant effects likely to influence decisions"* (GLVIA, page 22,

Summary advice on good practice, fifth bullet point). The methodology was agreed with the Landscape Officer from WSCC. The judgements made on significance of landscape and visual effects in the LVIA were agreed to be accurate by the Landscape Officers at both WSCC and HDC, both qualified and suitably experienced landscape architects. The GLVIA acknowledges that *“even with qualified and experienced professionals there can be differences in the judgements made”* (GLVIA, paragraph 2.25). However, three such landscape architects (WSCC, HDC and RPS) have come to the same conclusion, that although there will be adverse landscape and visual effects, the development is acceptable in terms of its impact on landscape and visual amenity.

6.8 I respectfully request the Inspector to allow the Appeal.

Signed:

Dated:

