

WEALDEN 3Rs

BCR 2.5 SUMMARY OF 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

PINS Reference: APP/P3800/W/18/3218965

JSL2921
Landscape and Visual
Summary of Rebuttal Proof of
Evidence
VF
October 2019

1 SUMMARY

- 1.1 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.
- 1.2 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.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 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.