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Mrs Lucy Harding  
County Planning  
West Sussex County Council  
County Hall  
Chichester, PO19 1RH.

8<sup>th</sup> January 2017

Dear Mrs Harding,

**WSSC/062/16/NH: Recycling, Recovery and Renewable Energy Facility and Ancillary Infrastructure. Former Wealden Brickworks, Langhurstwood Road, Horsham, West Sussex, RH12 4QD**

This is the formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above application. 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 **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 5.2.4 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 it is within the capacity of the Landscape Character Areas that the Application Site is situated in, to absorb this type of development."*

However, the EIA 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 summary Table 5.6 erroneously transposes these character areas and their respective effects). 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 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.

(Incidentally, Table 5.6 also describes the duration of the impacts of the operational phase of the development as “short-term”, which must be an error as the operational phase is elsewhere described as “permanent” (e.g. paragraph 5.3.4)).

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 5.2.3, that “*The Application Site is situated within the context of existing industrial development*”. However, we consider that the EIA here underplays the likely impact of the proposed buildings, which include the extremely large Boiler Hall building, up to 48.75m high, 67.3m long and 30m wide, and the bunker, 45m high, 16.1m long and 50.5m wide. These are both of very considerable bulk and, particularly, are of a height very 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 viewpoints 3, 4 and 11.

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.

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, the sheer scale of the proposed buildings unlike anything else in the view and would inevitably draw the eye.

As regards close range views, we note that the EIA Non-Technical Summary (NTS) concludes, in paragraph 5.2.3, that *“The Application Site is situated within the context of existing industrial development on adjacent land that is afforded a high level of enclosure by the mature vegetation and woodland that surrounds them”*. Paragraph 5.2.5 states *“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.”* However, the EIA does not include any close range view photomontages to confirm this.

We explain above our opinion that the scale and form of the proposed buildings would bear only limited relation to the existing buildings, such that the context would actually do little to reduce the visual impact of the proposed development. 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 view of the top of the building and the stack above existing vegetation would serve to demonstrate their sheer bulk and incongruous height.

Paragraph 5.2.5 also states that *“The colours selected for the building and stack mean that the visibility of the proposed development would be minimised. The grey stack would blend into the sky and the green building would be less obvious where it is seen amongst the high level of woodland vegetation in the area.”*

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 would also question the suggested use of green cladding for the lower elements as, odd though it may seem, green is rarely the best choice of colour for new buildings in the countryside except perhaps for a matt moss green or drab olive.

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

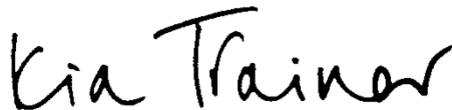
the National Planning Policy for Waste and the National Planning Policy Framework, that these two documents support these local plan policies and that therefore neither indicate that a decision should be made other than in accordance with the adopted local plans.

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 script is cursive and fluid, with the first letters of "Kia" and "Trainor" being capitalized and prominent.

**Kia Trainor, Director, CPRE Sussex**